GUARDRISK
TAILORED RISK SOLUTIONS
GUARDRISK
PAIA MANUAL
for
GUARDRISK
INTERNATIONAL LIMITED
PCC
Issued in terms of Section 51 of
the Promotion of Access to
Information Act 2 of 2000
July 2026
momentum
METROPOLITAN
GUARDRISK

Table of Contents

1. Introduction 4

2. List of Acronyms, Abbeviations and Definitions 4

3. Purpose of PAIA Manual 5

4. Key Contact Details for access to Information For Guardrisk 6

4.1 Guardrisk's Appointed Information Officer 6

4.2 Guardrisk's Appointed Deputy Information Officer 6

4.3 Guardrisk Head Office 7

5. The Information Regulator of South Africa 7

5.1 Applicability to Guardrisk 8

5.2 Availability of the Manual 8

6. General Subjects and categories on which records are held at Guardrisk 8

7. The accessibility of the documents listed below may be subject to the grounds of refusal: 10

7.1 Employee Records: 10

7.2 Client Related Records 10

7.3 Guardrisk Company Records 11

7.4 Client Care Records 11

7.5 Alternate Records 11

7.6 Other Records 11

7.7 Categories of data subjects on which Guardrisk hold records 12

7.8 Description of records available in accordance with other legislation 12

8. Categories of data subjects, the information relation to data subjects, and purposes that Guardrisk processes Personal Information 13

8.1 Client Data 13

8.2 Employee Data 13

8.3 Guardrisk Company Data 14

8.4 Third Party and External Records 14

8.5 Receipts to whom personal information may be supplied to 15

8.6 Transborder flows of Personal Information 15

9. Personal Information Security 16

10. Accessing records held by Guardrisk 16

11. Request Procedure for accessing records 17

12. Decision on Providing information 18

12.1 Grounds for refusal of access to records 19

13. Remedies available when Guardrisk Refuses a requestor 20

14. Fees 21

15. Updating of the manual 21

16. ANNEXURE 1 – Guardrisk Group Companies 22

17. ANNEXURE 2 - Legislations 23

18. ANNEXURE 3 - Fees 25

19. ANNEXURE 4 - Prescribed Form to be Completed by a Requester 27

1. INTRODUCTION

Section 32 of the Constitution of the Republic of South Africa, No. 108 of 1996 ("the Constitution") provides that everyone has the right of access to any information held by the state and any information that is held by another person and that is required for the exercise or protection of any rights. National legislation must be enacted to give effect to this right and may provide for reasonable measures to alleviate the administrative and financial burden on the state.

The Promotion of Access to Information Act, 2 of 2000 ("the Act") as amended, was enacted on 3 February 2002 to give effect to Section 32 of the Constitution, that is giving effect to the constitutional right of access to any information held by the State and any information that is held by another person and that is required for the exercise or protection of any rights. Where a request is made in terms of this Act, the private or public body to whom the request is made is obliged to release the information, except where the Act expressly provides that the information must not be released. The Act sets out the requisite procedural issues attached to such request.

The Act came into effect on 9 March 2001 with the exception of sections 10, 14, 16 and 51 which sections were brought into operation on 15 February 2002.

2. LIST OF ACRONYMS, ABBEVIATIONS AND DEFINITIONS

The following definitions apply in relation to the reading of this document:

Name	Definition
CEO	Chief Executive Officer
Data Subject	A data subject is a person to whom Personal Information relates.
DIO	Deputy Information Officer
Guardrisk	Refers to Guardrisk International Limited PCC, with registration number 19965/3817.
Information Officer (IO):	means the person who is responsible for discharging the duties and responsibilities assigned to the “head” of the private institution, such as the managing director or any person duly appointed by the managing director.
IR	Information Regulator
Minister	Minister of Justice and Correctional Services
Other Requester	means any person making a request for access to a record.
PAIA	Promotion of Access to Information Act No. 2 of 2000 (as Amended)
Personal Information	According to the POPI Act ‘‘Personal Information’’ means information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person. The

Name	Definition
	POPI Act, which has more specific examples, can be found at the following link: POPIA
Personal Requester	means any person making a request for access to a record containing personal information about the requester.
POPIA	Protection of Personal Information Act No.4 of 2013
Requester:	means any person making a request for access to a record.
Third Party	means any natural or juristic person other than the requester, a party acting on behalf of the requester, or Guardrisk itself.

3. PURPOSE OF PAIA MANUAL

The purpose of this manual is to provide assurance to the regulator and the public on the processes at Guardrisk Ltd and its subsidiaries to avail information to requesters, and that Guardrisk complies with the requirements of both PAIA and POPIA.

This PAIA Manual is useful for the public to:

3.1 check the categories of records held by a body which are available without a person having to submit a formal PAIA request;

3.2 have a sufficient understanding of how to make a request for access to a record of the body, by providing a description of the subjects on which the body holds records and the categories of records held on each subject;

3.3 know the description of the records of the body which are available in accordance with any other legislation;

3.4 access all the relevant contact details of the Information Officer and Deputy Information Officer who will assist the public with the records they intend to access;

3.5 know the description of the guide on how to use PAIA, as updated by the Regulator and how to obtain access to it;

3.6 know if the body will process personal information, the purpose of processing of personal information and the description of the categories of data subjects and of the information or categories of information relating thereto;

3.7 know the description of the categories of data subjects and of the information or categories of information relating thereto;

3.8 know the recipients or categories of recipients to whom the personal information may be supplied;

3.9 know if the body has planned to transfer or process personal information outside the Republic of South Africa and the recipients or categories of recipients to whom the personal information may be supplied; and

3.10 know whether the body has appropriate security measures to ensure the confidentiality, integrity and availability of the personal information which is to be processed.

4. KEY CONTACT DETAILS FOR ACCESS TO INFORMATION FOR GUARDRISK

4.1 GUARDRISK'S APPOINTED INFORMATION OFFICER

The Chief Executive Officer of Guardrisk Group has authorised the Momentum Group Chief Privacy Officer as the Information Officer for Guardrisk.

Name:	Ms. Jeanine Norden
Designation:	Momentum Group Chief Privacy Officer
Postal Address:	PO Box 7400, Centurion, 0046
Physical Address:	Guardrisk The Marc, Tower 2 129 Rivonia Road Sandton, 2196
Contact Number:	+27 11 669 1000
E-mail:	dataprivacy@mmltd.co.za
Website	https://www.momentumgroupltd.co.za

4.2 GUARDRISK'S APPOINTED DEPUTY INFORMATION OFFICER

The Information Officer of Guardrisk Group has designated the Head of Risk as the Deputy Information Officer for Guardrisk.

Name:	Ms. Nalisha Sivanarain
Designation:	Head of Risk
Postal Address:	PO Box 786015 Sandton, 2146

Physical Address:	Guardrisk The Marc, Tower 2 129 Rivonia Street, Sandton, 2196
Contact Number:	+ 27 11 669 1000
E-mail:	dataprivacy@mmltd.co.za
Website	https://guardrisk.co.za/

4.3 GUARDRISK HEAD OFFICE

Johannesburg Office:

Physical Address:	The Marc, Tower 2 129 Rivonia Street, Sandton, 2196
Contact Number:	+ 27 11 669 1000
Website:	http://www.guardrisk.co.za

5. THE INFORMATION REGULATOR OF SOUTH AFRICA

The Information Regulator is required in terms of the Act to compile a guide in every official language, in an easily comprehensible form and manner, as may be required by a person who wishes to exercise any right contemplated in the Act.

Any enquiries regarding this guide should be directed to:

Address:	The Information Regulator (South Africa) Woodmead North Office Park 54 Maxwell Drive Woodmead Johannesburg 2191

Telephone Number:	+27 10 023 5200 or 0800 017 160 (toll-free line)
General enquiries:	enquiries@inforegulator.org.za
Complaints:	paiacomplaints@inforegulator.org.za
Web Address:	https://inforegulator.org.za/

5.1 APPLICABILITY TO GUARDRISK

Guardrisk International Limited PCC is a registered company in terms of the Companies Act, Act 71 of 2008, as amended.

The Guardrisk Group of companies falls within the definition of a private body; therefore, the sections in the Act, pertaining to private bodies will be applicable.

This manual applies to the Guardrisk International Limited PCC, part of Guardrisk Group (Pty) Ltd and all its South African-based registered companies, insofar as such companies are its subsidiaries and are legal entities. Access to the records of any subsidiary company of Guardrisk may be requested from the Information Officer.

This manual is available for inspection, free of charge, at the physical address of the Guardrisk office.

5.2 AVAILABILITY OF THE MANUAL

This manual is available in English at:

- On the Guardrisk website - https://guardrisk.co.za/paia-manuals/
- at the head office of Guardrisk for public inspection during normal business hours;
- to any person upon request; and
- from the Information Regulator upon request.

6. GENERAL SUBJECTS AND CATEGORIES ON WHICH RECORDS ARE HELD AT GUARDRISK

NOTE: Guardrisk does not provide information on categories of records which are available without a person having to request access and/or are automatically available.

Products and Services
Health Care Products Long-Term Insurance Products Medical Aid Administration

Non-Life Medical Insurance Cover
Short-Term Insurance Products

Company Records
Actuarial
All records kept in terms of law related to managing legal entities
Client Care
Distribution
Finance and supporting documentation.
Human Resources
Information Technology
Marketing
Product Management

Subjects on which records are held
Shareholders
Board Members
Business partners
Contractors
Directors
Employees*
Officials
Consultants
Investors
Service Providers
Suppliers and Vendors
Subsidiary Companies
Advisors
Independent Brokers
Clients
Third Parties
Banking Institutions
External Companies/Contractors
Policyholders

The following records are held in respect of the above-mentioned subjects
CCTV Footage
Commercial
Confidential
Contract Details
Financial

Group/Company Records
Group/Company Financial
Group/Company Incorporation
Group/Company Structure
Operational
Personal
Policy Documents
Products And Services
Scientific Research
Strategy.
Subsidiary Companies

7. THE ACCESSIBILITY OF THE DOCUMENTS LISTED BELOW MAY BE SUBJECT TO THE GROUNDS OF REFUSAL:

7.1 EMPLOYEE RECORDS:

"Employee" refers to any person who works for or provides services to or on behalf of Guardrisk and receives or is entitled to receive remuneration and any other person who assists in carrying out or conducting the business of Guardrisk and includes, without limitation, directors (executive and non-executive), all permanent, temporary and part-time staff, as well as contract workers. Employee Records may include the following:

- Personal records provided by employees.
- Records provided by a third party relating to employees.
- Conditions of employment and other employee related contractual and quasi-legal records.
- Correspondence relating to employees; and
- Training schedule/s and material.

7.2 CLIENT RELATED RECORDS

A "client" refers to any natural or juristic entity that receives services from Guardrisk. Client Records may include the following:

- Records provided by a client to an intermediary.
- Records provided by a third party.
- Records generated by or within Guardrisk relating to clients, including transactional records.

7.3 GUARDRISK COMPANY RECORDS

These records include but are not limited to the records that Guardrisk holds of their own affairs.

Company records may include the following:

- Financial Records
- Internal Correspondence
- Information Technology
- Operational Records
- Product Records
- Statutory Records
- Communications
- Internal Policies and Procedures
- Human Resources Records
- Administration Records
- Service Level Agreements, Contracts, and Other Agreements

7.4 CLIENT CARE RECORDS

- Policy/Contract Documents
- Applications
- Amendments
- Financial Transactions
- Alterations
- General Information

7.5 ALTERNATE RECORDS

- Company Secretarial Records
- Databases
- Records Held by an Official of Guardrisk

These records include but are not limited to the records which pertain to Guardrisk's own affairs.

7.6 OTHER RECORDS

Further records are held pertaining to:

- Shareholders
- Directors

- Employees
- Officials
- Intermediaries
- Service Providers

7.7 CATEGORIES OF DATA SUBJECTS ON WHICH GUARDRISK HOLD RECORDS

Category of data subject	Categories of information and records*
Employees of Guardrisk	Name, ID number, physical address, health information, disability information, employee benefit information, bank details, tax number, letter of appointment, vehicle registration information, performance records, payslips, training records, CV, records of qualifications, psychometric assessment results, credit check results, criminal record check results, CCTV footage, next of kin information, beneficiary information, sexual health, sexual orientation, trade union membership, religious or philosophical beliefs, biometric information (photos)
Clients of Guardrisk	Name, ID or registration number, address, financial information, credit check results, health information, application form, policy documents, VAT number, tax number, tax certificates, CCTV footage, biometric information (photos), call recordings, vehicle, and driver registration information, payment records, geo-location, policy information, contact person information if the client is a juristic person.
Business partners that Guardrisk partner with for delivering certain products	Name, registration number, contact details, cashbacks, CCTV footage
Third parties with whom Guardrisk conduct business services with	Name, registration number, financial information, contract details, CCTV footage
Contractors at Guardrisk	Name, surname, physical address, registration number, financial information, contract, contractor name, ID number of contractors, CCTV footage, vehicle and driver registration information, biometric information (photos)
Suppliers and Vendors of Guardrisk	Name, registration number, financial information, contract, tender documents, CCTV footage

7.8 DESCRIPTION OF RECORDS AVAILABLE IN ACCORDANCE WITH OTHER LEGISLATION

A requester may also request information that is available in terms of other legislation. Please refer to **Annexure 2** for such legislation and records.

8. CATEGORIES OF DATA SUBJECTS, THE INFORMATION RELATION TO DATA SUBJECTS, AND PURPOSES THAT GUARDRISK PROCESSES PERSONAL INFORMATION

In terms of POPIA, personal information may only be processed for a specific purpose. Guardrisk offers various products and services, and the reason for processing personal information may differ depending on the nature of the information collected, the data subject involved, and the specific product and/or service applicable. The purpose for processing is disclosed either explicitly or implicitly at the time the information is collected. The Guardrisk Privacy Notice provides further detail on how personal information is collected and processed by Guardrisk.

Below follows the categories of Data Subjects, the information held relating to Data Subjects, and purposes that Guardrisk processes Personal Information.

8.1 CLIENT DATA

Client data is collected at various collection points as part of engagements with clients and provides Guardrisk the ability to provide products and services to our clients. By means of example, the data may be collected as part of an application process, during a claims process in assessing a client's financial needs, in administering a client's health plan, assessing a client's risk profile or investment needs or for research purposes. Guardrisk may also acquire data about our clients from third parties and process the data provided from credit bureaus or other industry bodies, a client's employer, health care providers or other providers to*:

- conduct underwriting
- perform a risk assessment on a client
- consider claims
- provide financial advice
- process medical expenses/claim on behalf of a medical scheme
- process a product/service application
- conduct research

***Note: the list above may not be an exhaustive list.**

8.2 EMPLOYEE DATA

Guardrisk processes employee data for business administration purposes, such as payroll purposes. Employee data is also processed to the extent required by legislation. For example, the disclosure of employee's financial information to the Commissioner for the South African Revenue Services

(SARS) in terms of the Income Tax Act 58 of 1962 and employees' special personal information in terms of the Employment Equity Act 55 of 1998.

8.3 GUARDRISK COMPANY DATA

These records include, but are not limited to, the records that pertain to Guardrisk's own affairs. These include the following:

- Financial records and reports
- Operational Records
- Communication
- Product and services records
- Administrative records (E.g., Legal Agreements, contracts, service-level agreements)
- Information Technology
- Statutory records and reports
- Internal policies, procedures, and standards
- Human Resources data and records
- Company Intellectual Property

8.4 THIRD PARTY AND EXTERNAL RECORDS

These records include data acquired either in the public domain or from third party providers directly and include but may not be an exhaustive list, to be able to process payments or perform functions on Guardrisk's behalf, because of an outsourced service or as part that is provided by the third party.

In performing these tasks Guardrisk may process, collect, store, collate or disclose personal or special personal information. This may include the following information:

- Employee, client (being juristic or non-juristic entities) or private body records that are held by external third parties, other than subsidiaries of the Guardrisk.
- Financial records, correspondence, contractual records, payment records, records provided by other parties or records that third parties provided to Guardrisk or its subsidiaries that are held within the Guardrisk that may pertain to other parties.
- Guardrisk may keep records pertaining to other parties, including contractors, suppliers' subsidiaries, holdings, joint-venture entities, service providers or entities that Guardrisk may have a shareholding in.

8.5 RECEIPTS TO WHOM PERSONAL INFORMATION MAY BE SUPPLIED TO

In relation to a personal requester, Guardrisk will provide the requested information, or give access to any record regarding the requester's personal information without the requester having to pay an access fee, but the prescribed fees for reproduction of the information requested will be charged.

In relation to any other requester, they are entitled to request access to information relating to a third party or parties. However, Guardrisk is not obliged to voluntarily grant access. Such requester must fulfil the prerequisite requirements for access in terms of the Act, including payment of the relevant fees. Subject to the nature of the data requested, Guardrisk may supply the personal information to the following recipients:

- Statutory oversight bodies, regulators or judicial commissions of enquiry making a request for data (such as the National Credit Regulator in terms of the National Credit Act 34 of 2005) – please reference list above for more examples.
- Any court, administrative or judicial forum, arbitration, statutory commission or ombud making a request for data held by Guardrisk in terms of the applicable rules (such as the Competition Commission of the Competition Act 89 of 1998)
- The South African Revenue Service, or another similar authority.
- The Department of Labour, or other similar authority.
- A contracted third party who requires the information to provide healthcare services to a member or their dependents on their health plan.
- Anyone making a successful application for access in terms of PAIA
- Auditing and accounting bodies (both internal and external)
- Research or academic institutions (where applicable)
- Information regarding a data subject's creditworthiness with any credit bureau or credit provider, industry association or other association where Guardrisk operates in, provided it is in line with the provisions in POPIA, the relevant POPIA codes of conduct and the National Credit Act 34 of 2005.

8.6 TRANSBORDER FLOWS OF PERSONAL INFORMATION

Guardrisk may transfer personal information to a third party in a foreign country to administer certain services. Guardrisk may only do so subject to the provisions of POPIA and Guardrisk's Data Privacy policies. Guardrisk shall ensure that the third party to whom the personal information is transmitted has an adequate level of data protection.

9. PERSONAL INFORMATION SECURITY

We are legally obliged to provide adequate protection for the Personal Information we hold and to prevent unauthorised destruction, access, use, loss of or damage to personal information. We will, on an ongoing basis, continue to review our security controls and related processes to ensure that your Personal Information is secure.

Our security policies and procedures cover:

- Identifying all reasonable internal and external risks to personal information
- Acceptable usage of personal information;
- Access to personal information;
- Data encryption
- Data backups
- Agreements concluded with operators to implement security controls
- Defensive measures
- Anti-virus and anti-malware solutions
- Computer and network security;
- Governance and regulatory issues;
- Investigating and reacting to security incidents.
- Monitoring access and usage of personal information;
- Physical security;
- Retention and disposal of information;
- Secure communications;
- Security in contracting out activities or functions;

When we contract with third parties, we impose appropriate security, privacy and confidentiality obligations on them to ensure that Personal Information that we remain responsible for, is kept secure.

We will ensure that anyone to whom we pass Personal Information agrees to treat the information with the same level of protection as we are obliged to provide.

10. ACCESSING RECORDS HELD BY GUARDRISK

Records held by Guardrisk will be accessed only once the prerequisite requirements for access have been met by a requester. A requester is any person making a request for access to a record of or held by Guardrisk. There are two types of requesters:

1. Personal requester

A personal requester is a requester who is seeking access to a record containing personal information about the requester.

Guardrisk will voluntarily provide the requested information or give access to any record regarding the requester's personal information. The prescribed fee for reproduction of the information requested could be charged.

2. Other requester

This requester (other than a personal requester) is entitled to request access to information on third parties. However, Guardrisk is not obliged to voluntarily grant access. The requester must fulfil the prerequisite requirements for access in terms of the Act, including the payment of a request and access fee.

11. REQUEST PROCEDURE FOR ACCESSING RECORDS

- The requester must comply with all the procedural requirements contained in the Act relating to the request for access to a record.
- The requester must complete the prescribed form enclosed herewith in "Annexure 4" and submit same as well as payment of a request fee and a deposit, if applicable to the Information Officer at the postal or physical address, fax number or electronic mail address as stated in Part I above.

[Requesters please note that all of the information listed above should be provided, failing which the process will be delayed while the private body requests such additional information. The prescribed time periods will not commence until all pertinent information has been furnished to Guardrisk].

- The prescribed form must be filled in with enough particularity to at least enable the Information Officer to identify:
- The record or records requested;
- The identity of the requester (or person acting on behalf of the requester where applicable);
- The telephone number, postal address or fax number of the requester; and
- What form of access is required if the request is granted.

- The requester must state that he requires the information in order to exercise or protect a right and clearly state what the nature of the right is so to be exercised or protected. In addition, the requester must clearly specify why the record is necessary to exercise or protect such a right.
- The manner in which the requester wishes to be informed of the decision on the request, if in a manner in addition to written notification.
- The institution will process the request within thirty days, unless the request contains considerations that are of such a nature that an extension of the thirty-day time limit is necessitated.
- The requester shall be informed whether access is granted or denied. If, in addition, the requester requires the reasons for the decision in any other manner, the requester must state the manner and the particulars so required.
- The requester shall be informed whether access granted or denied. If, in addition, the requester requires the reasons for the decision in any other manner, he must state the manner and the particulars so required.
- If a request is made on behalf of another person, then the requester must submit proof of the capacity in which the requester is making the request to the reasonable satisfaction of the Information Officer.
- If an individual is unable to complete the prescribed form because of illiteracy or disability, such a person may make the request orally.
- The requester must pay the prescribed fee before any further processing can take place.

12. DECISION ON PROVIDING INFORMATION

- Guardrisk will, within 30 days of receipt of the request, decide whether to grant or decline the request and give notice with reasons (if required) to that effect. The Information Officer will take all reasonable steps to find a record that has been requested. If the record cannot be found or does not exist, the Information Officer must notify the requester by way of affidavit or affirmation that it is not possible to give access to the record. This is deemed to be a refusal of the request. If, however, the record is later found, the requester must be given access if the request would otherwise have been granted.
- The 30-day period within which Guardrisk has to decide whether to grant or refuse the request may be extended for a further period of not more than 30 days if the request is for a large amount of information, or the request requires a search for information held

at another office of Guardrisk and the information cannot reasonably be obtained within the original 30-day period. Should an extension be required, Guardrisk will notify the requester in writing and will also provide the procedure involved should the requester wish to apply to either the Information Regulator or a court against the extension.

If the request is:

- Granted: the notification must state the applicable access fee required to be paid, together with the procedure to be followed should the requester wish to apply to court against such fee, and the form in which access will be given.
- Declined: the notification must include adequate reasons for the decision, together with the relevant provisions of the Act relied upon and provide the procedure to be followed should the requester wish to apply to court against the decision.

The Information Officer's failure to respond to the requester within the thirty-day period constitutes a deemed refusal of the request.

Section 59 provides that the Information Officer may sever a record and grant access only to that portion which the law does not prohibit access to.

If access is granted, access must be given in the form that is reasonably required by the requester, or if the requester has not identified a preference, in a form reasonably determined by the Information Officer.

12.1 GROUNDS FOR REFUSAL OF ACCESS TO RECORDS

Guardrisk may refuse a request for information based on the following:

- Mandatory protection of the privacy of a third party who is a natural person, that would involve the unreasonable disclosure of personal information of that natural person.
- Mandatory protection of the commercial information of a third party, if the record contains:
  - Trade secrets of that third party.
  - Financial, commercial, scientific, or technical information which disclosure could likely cause harm to the financial or commercial interests of that third party; and
  - Information disclosed in confidence by a third party to Guardrisk, if the disclosure could put that third party at a disadvantage in negotiations or commercial competition.

- Mandatory protection of confidential information of third parties if it is protected in terms of any agreement or legislation.
- Mandatory protection of the safety of individuals and the protection of property.
- Mandatory protection of records which would be regarded as privileged in legal proceedings.
- The commercial activities of Guardrisk, which may include:
  - Trade secrets of Guardrisk.
  - Financial, commercial, scientific, or technical information which disclosure could likely cause harm to the financial or commercial interests of Guardrisk.
  - Information which, if disclosed, could put Guardrisk at a disadvantage in negotiations or commercial competition.
  - A computer program which is owned by Guardrisk, and which is protected by copyright.
- The research information of Guardrisk or a third party, if its disclosure would disclose the identity of the institution, the researcher or the subject matter of the research and would place the research at a serious disadvantage.
- Requests for information that is clearly frivolous or vexatious, or which involve an unreasonable diversion of resources shall be refused.

Notwithstanding the above, disclosure is mandatory where it would reveal a contravention of, or failure to comply with, the law, or an imminent and serious public safety or environmental risk.

13. REMEDIES AVAILABLE WHEN GUARDRISK REFUSES A REQUESTOR

- Internal Remedies

  Guardrisk does not have internal appeal procedures. Therefore, the decision made by the Information Officer is final. Requesters who are dissatisfied with a decision of the Information Officer will have to exercise external remedies at their disposal.
- External Remedies

  A requester or a third party, who is dissatisfied with an Information Officer's refusal to disclose information, or the disclosed information may within 30 days of notification of the decision, apply to the Constitutional Court, the High Court or another court of similar status for relief.

14. FEES

- The Act provides for two types of fees, namely:
  - A request fee, which will be a standard fee; and
  - An access fee will be calculated considering reproduction costs, search and preparation time and cost, as well as postal costs.
- When the request is received by the Information Officer, the officer will by notice require the requester, other than a personal requester, to pay the regulated prescribed request fee (if any) before further processing of the request.
- The Information Officer can withhold a record until the requester has paid the fees as indicated.
- A requester whose request for access to a record has been granted, must pay an access fee for reproduction, for search, preparation and for any time reasonably required more than the prescribed hours to search for and prepare the record(s) for disclosure including arrangements to make it available in the requested format. See Annexure 3.

NOTE: Not requesting a fee will be at the discretion of the Information officer.

15. UPDATING OF THE MANUAL

This manual is prepared by the Information Officer, Jeanine Norden, and will be updated as any changes to relevant legislation, processes, or persons responsible occur.

The current manual has been updated and published in July 2026.

16. ANNEXURE 1 – GUARDRISK GROUP COMPANIES

A comprehensive list of all Guardrisk Group companies is available from the Guardrisk company secretariat. The annexure below lists all active companies that are 100% owned.

Active companies owned by Guardrisk Group
Euroguard Insurance Company PCC Limited
Euroguard Insurance Managers Limited
Guardrisk Alternative Partner Solutions Proprietary Limited
Guardrisk Group Proprietary Limited
Guardrisk Insurance Company Limited
Guardrisk Insurance Company Mauritius Limited PCC
Guardrisk Insurance Management Limited
Guardrisk International Limited PCC
Guardrisk Life International Limited
Guardrisk Life Limited
Guardrisk Microinsurance Limited
Guardrisk Premium Finance Proprietary Limited
Momentum Financial Solutions Proprietary Limited
Momentum Insurance Limited
Momentum Short Term Insurance Limited (incorporated in Namibia)
Partner Risk Solutions Proprietary Limited
Zest Life Investments Proprietary Limited

17. ANNEXURE 2 - LEGISLATIONS

Description of the records which are available in accordance with any other legislation.

***Note: The below is not an exhaustive list of legislation and records related to legislation that is available.**

*Legislation	*Available records held at Guardrisk
Basic Conditions of Employment Act 75 of 1997	Employee and contractor contracts, Leave policy, etc.
Collective Investment Schemes Act 45 of 2002	Application forms, withdrawal forms etc. Fund fact sheets
Companies Act 71 of 2008, as Amended	Audited Financial statements
Compensation of Occupational Injuries and Diseases Act 130 of 1993	Workman's compensation application forms Rules
Competition Act 89 of 1998	Momentum Group Dawn Raid Policy, Momentum Group Code of Conduct, Momentum Group Conflict of Interest Policy
Consumer Protection Act 68 of 2008	Guardrisk Application forms, contracts etc advises the public among others, of Guardrisk promoting fair business practices and protecting consumers from unconscionable, unfair, unreasonable, unjust, or improper trade practices and deceptive, misleading, unfair or fraudulent conduct.
Copyright Act 98 of 1978	Reference to trademarks and intellectual property rights as indicated on Guardrisk designs, documents, services et.
Electronic Communications and Transactions Act 25 of 2002	Details of application of electronic transactions, signatures related to Application forms, withdrawal forms etc
Employment Equity Act 55 of 1998	BBEE Certificates, legally required submissions, standards, and applications
Financial Intelligence Centre Act 38 of 2001as Amended	Guardrisk Risk Management and Compliance programmes
Financial Markets Act 19 of 2012	Personal account trading policy: Prohibit insider trading, and other market abuses.
Income Tax Act 58 of 1862 and Value Added Tax Act 89 of 1991	Value Added Tax Registration IRP2/3/5's to employees and investors VAT invoicing
Labour Relations Act 66 of 1995	Guardrisk Code of Conduct, Guardrisk Grievance and Disciplinary Policy, etc

Long-Term Insurance Act 52 of 1998	Financial Service Provider certificates, Product descriptions, product rules and advice records etc.
Medical Schemes Act 131 of 1998	Applications forms, claim forms, administration rules etc.
National Credit Act 34 of 2005, as Amended	Guardrisk guidance note on application of NCA. Reports to NCA.
Occupational Health and Safety Act 85 of 1993	Training notes and guidance notes to employees to provide for the health and safety of employees at work and for the health and safety of persons.
Pension Funds Act 24 of 1956	Policyholder Protection Rules Pension Fund Regulations
Protection of Personal Information Act 4 of 2013	Guardrisk Privacy Policy, details of Information officers, Deputy Information officers, Appointment certificates, POPIA and PAIA manuals
Short-term Insurance Act 53 of 1998, as Amended	Financial Service Provider certificates, Product descriptions, product rules and advice records etc.
Skills Development Levies Act 9 of 1999	Legally required submissions, standards, and applications
Trademarks Act 194 of 1993	Reference to trademarks and intellectual property rights as indicated on Guardrisk Group designs, documents, services and information on registered trademarks held by Guardrisk Group.
Unemployment Insurance Act 63 of 2001	Information on salary deductions, contributions, and applications to Fund

18. ANNEXURE 3 - FEES

18.1. Reproduction Fees (i.e. in Terms of Section 52(3) of the Act)

Where a private body has voluntarily provided the Minister with a list of categories of records that will automatically be made available to any person requesting access thereto, the only charge that may be levied for obtaining such records, will be a fee for reproduction of the record in question. Such fees are reflected below:

DESCRIPTION	AMOUNT (ZAR)
• For every photocopy of an A4-size page or part thereof • For every printed copy of an A4-size page or part thereof held on a computer, electronic or machine-readable format	1.10 0.75
• For a copy in a computer-readable form on Memory Disc • For a copy in a computer-readable form on Compact Disc • A transcription of visual images, for an A4-size page or part thereof • For a copy of visual images • A transcription of an audio record, for an A4-size page or part thereof • To search for a record that must be disclosed – rate payable per hour or part thereof	7.50 70.00 40.00 60.00 20.00 30.00

Where a copy of a record needs to be posted, the actual postal fees will also be payable.

18.2. Request Fees

Where a request is made for access to information on a person other than that requester, a request fee in the amount of R50,00 is payable upfront before Guardrisk will further process the request received.

18.3. Access Fees (i.e. in terms of Section 54(7) of the Act, Unless Exempted in Terms of Section 54(8))

An access fee is payable in instances where access is granted to a requester (other than in instances where the information has been provided automatically on a voluntary basis), unless payment of an access fee is specifically excluded in terms of the Act or an exclusion is determined by the Minister in terms of Section 54(8).

DESCRIPTION	AMOUNT (ZAR)
• For every photocopy of an A4-size page or part thereof • For every printed copy of an A4-size page or part thereof held on a computer, electronic or machine-readable format	1.10 0.75
• For a copy in a computer-readable form on Stiffy Disc • For a copy in a computer-readable form on Compact Disc • A transcription of visual images, for an A4-size page or part thereof • For a copy of visual images • A transcription of an audio record, for an A4-size page or part thereof • To search for a record that must be disclosed – rate payable per hour or part thereof	7.50 70.00 40.00 60.00 20.00 30.00

In accordance with Section 54(2) of the Act, upon receipt of a request for access to a record in respect of which the request for access does not apply to a personal requester, the Information Officer may request that an upfront deposit be paid before proceeding with the request. Such deposit will be calculated as an amount that will not exceed one third of the access fee and would be dependent on whether the Information Officer is of the opinion that the preparation of the required records will take more than six hours to complete.

Note: In terms of Regulation 8, Value Added Tax (VAT) Registered entities may add VAT to the prescribed fees.

19. ANNEXURE 4 - PRESCRIBED FORM TO BE COMPLETED BY A REQUESTER

FORM 2

REQUEST FOR ACCESS TO RECORD

[Regulation 7]

NOTE:
1. Proof of identity must be attached by the requester.
2. If requests made on behalf of another person, proof of such authorisation, must be attached to this form.

TO: The Information Officer

Tel: +27 (0)11 669 1000

Email: dataprivacy@mmltd.co.za
NOTE: The email address above is the only official email address that will consider submissions.

*Mark with an **"X"***

☐ Request is made in my own name ☐ Request is made on behalf of another person.

PERSONAL INFORMATION

Full Names:				
Identity Number:				
Capacity in which request is made (when made on behalf of another person)				
Postal Address:				
Physical Address:				
Email Address:				
Contact Numbers:	Tel. (B):		Facsimile:	
	Cellular:			

Full names of person on whose behalf request is made (if applicable):				
Identity Number				
Postal Address				
Physical Address:				
Email Address:				
Contact Numbers:	Tel. (B):		Facsimile:	
	Cellular:			

PARTICULARS OF RECORD REQUESTED

Provide full particulars of the record to which access is requested, including the reference number if that is known to you, to enable the record to be located.
(*If the provided space is inadequate, please continue on a separate page and attach it to this form. All additional pages must be signed.)*

Description of record or relevant part of the record:
Reference number, if available:
Any further particulars of record:

TYPE OF RECORD (mark the applicable box with an X)

1. Record is in written or printed form. ☐
2. Record comprises virtual images (including photographs, slides, video recordings and computer-generated images, sketches, etc.). ☐
3. Record consists of recorded words or information which can be reproduced in sound. ☐
4. Records are held on a computer or in an electronic format. ☐

FORM OF ACCESS (mark the applicable box with an X)

1. Printed copies of the information (including copies of virtual images, transcriptions and information held in electronic form). ☐
2. Written or printed transcription of virtual images (including photographs, slides, video recordings, computer generated images and sketches). ☐
3. Transcription of a soundtrack (written or printed document). ☐
4. Copies of information on a flash drive (including virtual images and soundtracks). ☐
5. Copies of information on a compact disk (CD) (including virtual images and soundtracks). ☐
6. Copy of record stored on a cloud storage server. ☐

MANNER OF ACCESS (mark the applicable box with an X)

1. Personal inspection of information at the registered address of Guardrisk (including listening to recorded words, information which can be reproduced in sound or information held on a computer or in electronic format). ☐
2. Postal service to postal address. ☐
3. Courier service to street address. ☐
4. Email of information (*including soundtracks if possible*). ☐
5. Cloud share / file transfer. ☐

** If you requested a copy or transcription of a record, do you wish the copy or transcription to be couriered to you?*

Yes ☐ No ☐

PARTICULARS OF RIGHT TO BE EXERCISED OR PROTECTED

If the provided space is inadequate, please continue on a separate folio and attach it to this Form. The requester must sign all the additional folios.

Indicate which right is to be exercised or protected:
Explain why the record requested is required for the exercise or protection of the said right:

FEES

- A request for access to a record, other than a record containing personal information about you, will be processed only after a request fee has been paid.
- You will be notified of the amount to be paid as a request fee.
- The fee payable for access to a record depends on the form in which access is required, and the time reasonably required to search for and prepare a record.
- If you qualify for exemption of the payment of any fee, please state the reason for exemption.

Reason for exemption from payment of fees:

NOTICE OF DECISION REGARDING REQUEST FOR ACCESS

You will be notified in writing whether your request has been approved/denied. If you wish to be advised in another manner, please specify the manner and provide the necessary particulars to enable compliance with your request.

How would you prefer to be informed of the decision regarding your request for access to the record?

Signed at _____ this_____ day of _____

_____

Signature of requester / person on whose behalf request is made

FOR OFFICIAL USE

Reference number:	
Request received by: *(State Rank, Name and Surname of Information Officer)*	
Date received:	
Access fees:	
Deposit (if any):	

_____

Signature of Information Officer