

FPM GROUP HOLDINGS (PTY) LTD INCLUDING ALL SUBSIDIARIES AND ASSOCIATED BUSINESSES

PAIA MANUAL

**Prepared in terms of section 51 of the
Promotion of Access to Information Act 2 of 2000
(as amended)**

**REVIEW DATE: MAY 2026
NEXT REVIEW DATE: MAY 2027**



1. LIST OF ACRONYMS AND ABBREVIATIONS

- | | | |
|-----|--------------------|--|
| 1.1 | “DIO” | Deputy Information Officer; |
| 1.2 | “IO“ | Information Officer; |
| 1.3 | “Minister” | Minister of Justice and Correctional Services; |
| 1.4 | “PAIA” | Promotion of Access to Information Act No. 2 of 2000 (as Amended); |
| 1.5 | “POPIA” | Protection of Personal Information Act No.4 of 2013; |
| 1.6 | “Regulator” | Information Regulator; and |
| 1.7 | “Republic” | Republic of South Africa |

2. PURPOSE OF PAIA MANUAL

This PAIA Manual is useful for the public to-

- 2.1 check the categories of records held by a body which are available without a person having to submit a formal PAIA request;
- 2.2 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;
- 2.3 know the description of the records of the body which are available in accordance with any other legislation;
- 2.4 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;
- 2.5 know the description of the guide on how to use PAIA, as updated by the Regulator and how to obtain access to it;
- 2.6 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;



- 2.7 know the description of the categories of data subjects and of the information or categories of information relating thereto;
- 2.8 know the recipients or categories of recipients to whom the personal information may be supplied;
- 2.9 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
- 2.10 know whether the body has appropriate security measures to ensure the confidentiality, integrity and availability of the personal information which is to be processed.

3. KEY CONTACT DETAILS FOR ACCESS TO INFORMATION OF FPM GROUP HOLDINGS (PTY) LTD AND ITS SUBSIDIARIES.

3.1. Information Officer

Name: Wayne Visser
Tel: 011 778 9300
Email: wayne@fpm.co.za
Fax number: 011 880 8360

3.2. Deputy Information Officers in terms of section 17 (1) of PAIA.

Name: Sally van der Merwe
Tel: 011 778 9300
Email: sally@fpm.co.za
Fax Number: 011 880 8360

Name: Corrina Stanton
Tel: 011 778 9300
Email: corrina@fpm.co.za
Fax Number: 011 880 8360

Name: Blake Wilmore
Tel: 011 778 9300
Email: blake@fpm.co.za
Fax Number: 011 880 8360



3.3 Access to information general contacts

Email: info@fpm.co.za

3.4 FPM GROUP HOLDINGS (PTY) LTD

Postal Address: Please use E-mail address
info@fpm.co.za

Physical Address: Jameson House
2 Jameson Avenue
MELROSE ESTATE
2196

Telephone: 011 778 9300

Email: info@fpm.co.za

Website: www.fpm.co.za

4. GUIDE ON HOW TO USE PAIA AND HOW TO OBTAIN ACCESS TO THE GUIDE

4.1. The Regulator has, in terms of section 10(1) of PAIA, as amended, updated and made available the revised Guide on how to use PAIA ("Guide"), in an easily comprehensible form and manner, as may reasonably be required by a person who wishes to exercise any right contemplated in PAIA and POPIA.

4.2. The aforesaid Guide contains the description of-

4.2.1. the objects of PAIA and POPIA;

4.2.2. the postal and street address, phone and fax number and, if available, electronic mail address of-

4.2.2.1. the Information Officer of every public body, and



- 4.2.2.2. every Deputy Information Officer of every public and private body designated in terms of section 17(1) of PAIA¹ and section 56 of POPIA²;
- 4.2.3. the manner and form of a request for-
 - 4.2.3.1. access to a record of a public body contemplated in section 11³; and
 - 4.2.3.2. access to a record of a private body contemplated in section 50⁴;
- 4.2.4. the assistance available from the IO of a public body in terms of PAIA and POPIA;
- 4.2.5. the assistance available from the Regulator in terms of PAIA and POPIA.
- 4.2.6. all remedies in law available regarding an act or failure to act in respect of a right or duty conferred or imposed by PAIA and POPIA, including the manner of lodging-
 - 4.2.6.1. an internal appeal;
 - 4.2.6.2. a complaint to the Regulator; and
 - 4.2.6.3. an application with a court against a decision by the information officer of a public body, a decision on internal appeal or a decision by the Regulator or a decision of the head of a private body;

¹ Section 17(1) of PAIA- *For the purposes of PAIA, each public body must, subject to legislation governing the employment of personnel of the public body concerned, designate such number of persons as deputy information officers as are necessary to render the public body as accessible as reasonably possible for requesters of its records.*

² Section 56(a) of POPIA- *Each public and private body must make provision, in the manner prescribed in section 17 of the Promotion of Access to Information Act, with the necessary changes, for the designation of such a number of persons, if any, as deputy information officers as is necessary to perform the duties and responsibilities as set out in section 55(1) of POPIA.*

³ Section 11(1) of PAIA- *A requester must be given access to a record of a public body if that requester complies with all the procedural requirements in PAIA relating to a request for access to that record; and access to that record is not refused in terms of any ground for refusal contemplated in Chapter 4 of this Part.*

⁴ Section 50(1) of PAIA- *A requester must be given access to any record of a private body if-*

- a) *that record is required for the exercise or protection of any rights;*
- b) *that person complies with the procedural requirements in PAIA relating to a request for access to that record; and*
- c) *access to that record is not refused in terms of any ground for refusal contemplated in Chapter 4 of this Part.*



- 4.2.7. the provisions of sections 14⁵ and 51⁶ requiring a public body and private body, respectively, to compile a manual, and how to obtain access to a manual;
 - 4.2.8. the provisions of sections 15⁷ and 52⁸ providing for the voluntary disclosure of categories of records by a public body and private body, respectively.
 - 4.2.9. the notices issued in terms of sections 22⁹ and 54¹⁰ regarding fees to be paid in relation to requests for access; and
 - 4.2.10. the regulations made in terms of section 92¹¹.
- 4.3. Members of the public can inspect or make copies of the Guide from the offices of FPM Group Holdings (Pty) Ltd, including the office of the Regulator, during normal working hours.
- 4.4. The Guide can also be obtained-
- 4.4.1. upon request to the Information or Deputy Information Officers;
 - 4.4.2. from the website of the Regulator (<https://www.justice.gov.za/inforeg/>).

⁵ Section 14(1) of PAIA- The information officer of a public body must, in at least three official languages, make available a manual containing information listed in paragraph 4 above. FPM Group Holdings will supply the English Manual as per the business language, but will supply translated versions of such documents upon request of the data subject involved.

⁶ Section 51(1) of PAIA- The head of a private body must make available a manual containing the description of the information listed in paragraph 4 above.

⁷ Section 15(1) of PAIA- The information officer of a public body, must make available in the prescribed manner a description of the categories of records of the public body that are automatically available without a person having to request access

⁸ Section 52(1) of PAIA- The head of a private body may, on a voluntary basis, make available in the prescribed manner a description of the categories of records of the private body that are automatically available without a person having to request access

⁹ Section 22(1) of PAIA- The information officer of a public body to whom a request for access is made, must by notice require the requester to pay the prescribed request fee (if any), before further processing the request.

¹⁰ Section 54(1) of PAIA- The head of a private body to whom a request for access is made must by notice require the requester to pay the prescribed request fee (if any), before further processing the request.

¹¹ Section 92(1) of PAIA provides that –“The Minister may, by notice in the Gazette, make regulations regarding-

- (a) any matter which is required or permitted by this Act to be prescribed;
- (b) any matter relating to the fees contemplated in sections 22 and 54;
- (c) any notice required by this Act;
- (d) uniform criteria to be applied by the information officer of a public body when deciding which categories of records are to be made available in terms of section 15; and
- (e) any administrative or procedural matter necessary to give effect to the provisions of this Act.”



5. TYPES OF RECORDS HELD BY FPM GROUP HOLDINGS (PTY) LTD

Requests for access to documents held by FPM Group Holdings (Pty) Ltd will be in accordance with the Act. The following records are available to the requester from the FPM Group Holdings (Pty) Ltd office:

5.1. Human Resources Records:

These include but are not limited to the following:

Any personal records provided to FPM Group Holdings (Pty) Ltd by their personnel; any records a third party has provided to FPM Group Holdings (Pty) Ltd about any of their personnel; conditions of employment and other personnel-related contractual and quasi-legal records; internal evaluation records; and other internal records and correspondence.

5.2. Customer-related records:

A customer includes any natural or juristic entity who receives services from FPM Group Holdings (Pty) Ltd.

Customer-related information includes but is not limited to the following:

Any records a customer has provided to a third party acting for or on behalf of FPM Group Holdings (Pty) Ltd; any records a third party has provided to FPM Group Holdings (Pty) Ltd; and records generated by or within FPM Group Holdings (Pty) Ltd pertaining to the customer, including transactional records.

5.3. Financial, IT and Operational records:

This includes but is not limited to the following:

Financial records; operational records; databases; information technology; marketing records; internal correspondence; product records; statutory records; internal policies and procedures; treasury-related records; securities and equities; and records held by officials of FPM Group Holdings (Pty) Ltd.

5.4. Other Parties

FPM Group Holdings (Pty) Ltd may possess records pertaining to other parties,



including without limitation, contractors, suppliers, subsidiary/holding companies, joint venture companies, service providers.

Alternatively, such other parties may possess records which can be said to belong to FPM Group Holdings (Pty) Ltd. The following records fall under this category:

Personnel, customer or FPM Group Holdings (Pty) Ltd records which are held by another party as opposed to being held by FPM Group Holdings (Pty) Ltd; and records held by FPM Group Holdings (Pty) Ltd pertaining to other parties, including without limitation financial records, correspondence, contractual records, records provided by the other party, and records third parties have provided about the contractors / suppliers.

5.5. Records available in terms of other legislation:

The requester may also request information which is available in terms of legislation, such as the following:

Basic Conditions of Employment Act, Companies Act, Compensation for Occupational Injuries & Diseases Act, Employment Equity Act, National Credit Act, Pension Funds Act, Financial Services Board Act, Income Tax Act, Labour Relations Act, Unemployment Insurance Act, Long Term Insurance Act, Occupational Health and Safety Act, Promotion of Equality and Prevention of Unfair Discrimination Act, Electronic Communications and Transactions Act, Short Term Insurance Act, Skills Development Act, Skills Development Levies Act, South African Qualifications Authority Act, VAT Act, Financial Intelligence Centre Act, Financial Advisory and Intermediary Services Act, Protection of Constitutional Democracy Against Terrorist and related Activities Act.

6. THE REQUEST PROCEDURE

- The requester must use the prescribed form (Annexure A) to make the request for access to a record to the above FPM Group Holdings (Pty) Ltd address, fax number or email address for the attention of the Information officer;
- The Information officer will notify the requester of the prescribed fee (if any) payable before further processing the request;
- A requester seeking access to a record containing their own personal information will not be charged a request fee if the information can be supplied in digital format;



- However:
 - If a hard copy (actual paper) is being requested, the client will be charged at R1.00 (one rand) per copied page – See annexure B
 - Postage / Courier fees are for the requester's own cost.
- The requester may lodge an application to court against the tender or payment of the fee;
- If the request is granted the requester will be accordingly notified and a further fee must be paid. This would be for the search, reproduction, preparation and time that exceed the prescribed hours to search and prepare the disclosure.

7. PROCESSING OF PERSONAL INFORMATION

7.1 Purpose of Processing Personal Information

FPM uses personal information in registering clients on policies.

7.2 Description of the categories of Data Subjects and of the information or categories of information relating thereto:

Categories of Data Subjects	Personal Information that may be processed
Customers / Clients	name, address, registration numbers or identity numbers, employment status and bank details
Service Providers	names, registration number, vat numbers, address, trade secrets and bank details
Employees	address, qualifications, gender and race

7.3 The recipients or categories of recipients to whom the personal information may be supplied:

Category of personal information	Recipients or Categories of Recipients to whom the personal information may be supplied.
Identity number and names, for criminal checks	South African Police Services
Qualifications, for qualification verifications	South African Qualifications Authority
Credit and payment history, for credit information	Credit Bureaus



- 7.4 General description of Information Security Measures to be implemented by the responsible party to ensure the confidentiality, integrity and availability of the information.

FPM has a firewall (Sophos) in place as well as an antivirus (F-Secure). Our passwords have at least 8 characters, upper and lower case letters with numbers and a special character. The FPM VPN allows for a secure connection to the office server and our emails are protected by Mimecast, as well as Sendmarc.

8. AVAILABILITY OF THE MANUAL

- 8.1 A copy of the Manual is available-
- 8.1.1 on FPM's Intranet and website;
 - 8.1.2 the office of FPM Group Holdings (Pty) Ltd for public inspection during normal business hours;
 - 8.1.3 to any person upon request and upon the payment of a reasonable prescribed fee (if any); and
 - 8.1.4 to the Information Regulator upon request.

9. UPDATING OF THE MANUAL

The Operations Manager and Compliance Administrator of FPM Group Holdings (Pty) Ltd will update this manual, annually.



Annexure A (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 (*Address*)

E-mail address: _____

Fax Number: _____

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			
Street Address			
E-mail Address			
Contact Numbers	Tel. (B):		Facsimile: _____
	Cellular:		
Full names of person on whose behalf request is made (if applicable):			
Identity Number			
Postal Address			



Street Address			
E-mail Address			
Contact Numbers	Tel. (B)		Facsimile
	Cellular		
PARTICULARS OF RECORD REQUESTED <i>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.)</i>			
Description of record or relevant part of the record:			
Reference number, if available			
Any further particulars of record			
TYPE OF RECORD <i>(Mark the applicable box with an "X")</i>			
Record is in written or printed form			
Record comprises virtual images <i>(this includes photographs, slides, video recordings, computer-generated images, sketches, etc)</i>			



Record consists of recorded words or information which can be reproduced in sound	
Record is held on a computer or in an electronic, or machine-readable form	
FORM OF ACCESS <i>(Mark the applicable box with an "X")</i>	
Printed copy of record <i>(including copies of any virtual images, transcriptions and information held on computer or in an electronic or machine-readable form)</i>	
Written or printed transcription of virtual images <i>(this includes photographs, slides, video recordings, computer-generated images, sketches, etc)</i>	
Transcription of soundtrack <i>(written or printed document)</i>	
Copy of record on flash drive <i>(including virtual images and soundtracks)</i>	
Copy of record on compact disc drive <i>(including virtual images and soundtracks)</i>	
Copy of record saved on cloud storage server	
MANNER OF ACCESS <i>(Mark the applicable box with an "X")</i>	
Personal inspection of record at registered address of public/private body <i>(including listening to recorded words, information which can be reproduced in sound, or information held on computer or in an electronic or machine-readable form)</i>	
Postal services to postal address	
Postal services to street address	
Courier service to street address	
Facsimile of information in written or printed format <i>(including transcriptions)</i>	
E-mail of information <i>(including soundtracks if possible)</i>	
Cloud share/file transfer	
Preferred language <i>(Note that if the record is not available in the language you prefer, access may be granted in the language in which the record is available)</i>	



PARTICULARS OF RIGHT TO BE EXERCISED OR PROTECTED

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

Indicate which right is to be exercised or protected	
Explain why the record requested is required for the exercise or protection of the aforementioned right:	
FEES	
a) <i>A request fee must be paid before the request will be considered.</i>	
b) <i>You will be notified of the amount of the access fee to be paid.</i>	
c) <i>The fee payable for access to a record depends on the form in which access is required and the reasonable time required to search for and prepare a record.</i>	
d) <i>If you qualify for exemption of the payment of any fee, please state the reason for exemption</i>	
Reason	

You will be notified in writing whether your request has been approved or denied and if approved the costs relating to your request, if any. Please indicate your preferred manner of correspondence:

Postal address	Facsimile	Electronic communication (Please specify)

Signed at _____ on this _____ day of _____ 20__

Signature of Requester / person on whose behalf request is made



FOR OFFICIAL USE

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

Signature of Information Officer



**ANNEXURE B [FORM 3]
OUTCOME OF REQUEST AND FEES PAYABLE
[REGULATION 8]**

Note:

1. If your request is granted the—
 - (a) amount of the deposit, (if any), is payable before your request is processed; and
 - (b) requested record/portion of the record will only be released once proof of full payment is received.
2. Please use the reference number hereunder in all future correspondence

Reference number: _____

TO: _____

Your request dated _____, refers.

1. You requested:

Personal inspection of information at registered address of public/private body (<i>including listening to recorded words, information which can be reproduced in sound, or information held on computer or in an electronic or machine-readable form</i>) is free of charge. You are required to make an appointment for the inspection of the information and to bring this Form with you. If you then require any form of reproduction of the information, you will be liable for the fees prescribed in Annexure B.	
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OR

2. You requested:

Printed copies of the information (<i>including copies of any virtual images, transcriptions and information held on computer or in an electronic or machine-readable form</i>) at R1.00 (one rand) per page	
Written or printed transcription of virtual images (<i>this includes photographs, slides, video recordings, computer-generated images, sketches, etc</i>)) at R1.00 (one rand) per page	
Transcription of soundtrack (<i>written or printed document</i>)) at R1.00 (one rand) per page	
Copy of information on flash drive (<i>including virtual images and soundtracks</i>) – Free if own flash drive provided	
Copy of information on compact disc drive(<i>including virtual images and soundtracks</i>) – Free if own CD is provided	
Copy of record saved on cloud storage server	

3. To be submitted:

Postal services to postal address	
Postal services to street address	
Courier service to street address	
Facsimile of information in written or printed format (<i>including transcriptions</i>)	
E-mail of information (<i>including soundtracks if possible</i>)	
Cloud share/file transfer	



Preferred language:

(Note that if the record is not available in the language you prefer, access may be granted in the language in which the record is available)

Kindly note that your request has been:

☐ Approved

☐ Denied, for the following reasons:

4. Fees payable with regards to your request:

Item	Cost per A4-size page or part thereof/item	Number of pages/items	Total
Photocopy			
Printed copy			
For a copy in a computer-readable form on:			
(i) Flash drive			
• To be provided by requestor	R40.00		
(ii) Compact disc			
• If provided by requestor	R40.00		
• If provided to the requestor	R60.00		
For a transcription of visual images per A4-size page	Service to be outsourced. Will depend on the quotation of the service provider		
Copy of visual images			
Transcription of an audio record, per A4-size	R24.00		
Copy of an audio record			
(i) Flash drive			
• To be provided by requestor	R40.00		
(ii) Compact disc			
• If provided by requestor	R40.00		
• If provided to the requestor	R60.00		
Postage, e-mail or any other electronic transfer:	Actual costs		
TOTAL:			

5. Deposit payable (if search exceeds six hours):

☐ Yes

☐ No



Hours of search		Amount of deposit (calculated on one third of total amount per request)	
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The amount must be paid into the following Bank account:

Name of Bank: _____

Name of account holder: _____

Type of account: _____

Account number: _____

Branch Code: _____

Reference Nr: _____

Submit proof of payment to: _____

Signed at _____ on this _____ day of _____ 20____

Information officer