Promotion of Access to Information (PAIA) Manual

1. Definitions and Interpretation

Aon means Aon South Africa (Pty) Ltd;

Associate means in relation to a juristic person which is a company, any subsidiary or holding company of that company, and any other subsidiary of that holding company;

Conditions for Lawful Processing means the conditions for the lawful processing of Personal Information as fully set out in POPIA and this Manual;

CEO means Chief Executive Officer;

Data Subject has the meaning ascribed thereto in section 1 of POPIA and includes both natural persons and juristic persons:

DIO means Deputy Information Officer;

Information Officer (IO) means the person that has been registered as the information officer with the Information Regulator in accordance with POPIA, being the Chief Executive Officer of the company or such other person designated as information officer by the Chief Executive Officer.

Manual means this manual prepared in accordance with section 51 of PAIA;

PAIA means the Promotion of Access to Information Act 2 of 2000, as amended or replaced from time to time;

Personal Information means information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person, including, but not limited to-

- a) information relating to the race, gender, sex, pregnancy, marital status, national, ethnic or social origin, colour, sexual orientation, age, physical or mental health, well-being, disability, religion, conscience, belief, culture, language and birth of the person;
- b) information relating to the education or the medical, financial, criminal or employment history of the person;
- c) any identifying number, symbol, e-mail address, physical address, telephone number, location information, online identifier or other particular assignment to the person;
- d) the biometric information of the person;
- e) the personal opinions, views or preferences of the person;
- f) correspondence sent by the person that is implicitly or explicitly of a private or confidential nature or further correspondence that would reveal the contents of the original correspondence;
- g) the views or opinions of another individual about the person; and
- h) the name of the person if it appears with other personal information relating to the person or if the disclosure of the name itself would reveal information about the person;

POPIA means the Protection of Personal Information Act 4 of 2013, as amended or replaced from time to time;

POPIA Regulations means the regulations promulgated in terms of section 112(2) of POPIA;

Private Body means:

- i) a natural person who carries or has carried on any trade, business or profession, but only in such capacity;
- j) a partnership which carries or has carried on any trade, business or profession; or
- k) any former or existing juristic person, but excludes a public body;

Processing means any operation or activity or any set of operations, whether or not by automatic means, concerning Personal Information, including-

- the collection, receipt, recording, organisation, collation, storage, updating or modification, retrieval, alteration, consultation or use;
- m) dissemination by means of transmission, distribution or making available in any other form; or
- n) merging, linking, as well as restriction, degradation, erasure or destruction of information;

Record of, or in relation to, a Private Body, means any recorded information-

- o) regardless of form or medium;
- p) in the possession or under the control of that Private Body; and
- q) whether or not it was created by that Private Body;

Requester, in relation to a Private Body, means any person, including, but not limited to, a public body or an official thereof, making a request for access to a record of that Private Body; or any person acting on behalf of such person:

Regulator means the Information Regulator;

Request for Access, in relation to a Private Body, means a request for access to a record of a Private Body in terms of section 50 of PAIA;

Responsible Party means a public body or Private Body or any other person which, alone or in conjunction with others, determines the purpose of and means for Processing Personal Information; and

Special Personal Information means Personal Information concerning religious or philosophical beliefs, race or ethnic origin, trade union membership, political persuasion, health or sex life, biometric information and criminal behaviour.

Capitalised terms used in this Manual have the meanings ascribed thereto in section 1 of POPIA and PAIA as the context specifically requires, unless otherwise defined herein.

2. Preamble

The Promotion of Access to Information Act, 2000 ("PAIA") came into operation on 23 November 2001 and the Protection of Personal Information Act, 2013 ("POPIA") came into effect on 1 July 2020, subject to a 12-month grace period.

Section 51 of PAIA requires Private Bodies to complete a manual which shall facilitate requests for information. Aon is such a Private Body which has compiled a manual, the terms of which are stated below.

The Manual is not exhaustive of, nor does it comprehensively deal with, every procedure provided for in PAIA and POPIA. Requesters are advised to familiarise themselves with the provisions of PAIA and POPIA before making any request to Aon in terms of PAIA and POPIA.

3. Purpose of the PAIA Manual

The purpose of this Manual is to enable the public to check the categories of records held by Aon and which records are available without a person having to submit a formal PAIA request. Have an understanding of how to make a request for access to a record as well as access the relevant contact details of the Information Officer and Deputy Information Officer who will assist the public with the records they intend to access.

A copy of the Manual is available at <u>Policies (aon.co.za)</u>, at head office (as per physical address provided below) for inspection (during normal business hours), to any person upon request and upon the payment of a reasonable prescribed fee and to the Information Regulator upon request.

4. Introduction

- 4.1 Aon has compiled this Manual to comply with the provisions of PAIA and POPIA and to ensure that members of the public have effective access to information in Aon's possession which will assist them in exercising and protecting their rights. Where information requested is not immediately available Aon will endeavour to make it available in a timely manner insofar as that is reasonably practicable in the circumstances.
- 4.2 This Manual sets out the procedure to be followed to facilitate a request to access to information as well as the following information:
 - 4.2.1 Purpose of the processing of Personal Information.
 - 4.2.2 Description of the categories of Data Subjects and of the information or categories of information relating thereto.
 - 4.2.3 The recipients or categories of recipients to whom Personal Information may be supplied.
 - 4.2.4 Planned transborder flows of Personal Information.
 - 4.2.5 A general description of the security measures implemented by Aon to ensure the confidentiality, integrity and availability of the information which is to be processed.

Contact Details Postal address:

PO Box 78367 Sandton 2146

Physical address:

The Place, 1 Sandton Drive Sandhurst, Sandton, Johannesburg 2196

Telephone numbers:

Telephone number: 0860 100 404 Website address: www.aon.co.za

Contact details of the Chief Executive Officer (CEO), Information Officer and Deputy Information Officer of Aon South Africa (Pty) Ltd

The Chief Executive Officer (CEO): Nolwandle Mgoqi

Telephone number: 0860 100 404 Email address: comments@aon.co.za

The Information Officer, as authorised by the CEO: Tanya Prozzi

Telephone number: 0860 100 404 Email address: comments@aon.co.za

In terms of s56 of POPIA and s17(1) of PAIA the Information Officer has further designated Deputy Information Officers as follows:

Deputy Information Officer: Simon Chambers

Telephone number: 0860 100 404 Email address: comments@aon.co.za

Deputy Information Officer: Carmen Foster

Telephone number: 0860 100 404 Email address: comments@aon.co.za

6. Information Regulator Guide

As of 30 June 2021, the Information Regulator has taken over the regulatory mandate functions relating to the Promotion of Access to Information Act (PAIA) 2000. This follows a proclamation, by the President, of sections 110 and 114(4) of POPIA which provided for the amendment of PAIA and the effective transfer of certain functions performed by the South African Human Rights Commission (SAHRC) to the Information Regulator.

The PAIA Guide was developed in fulfilment of the Information Regulator's obligation under section 10 of the PAIA, which requires the Regulator to update and make available the existing Guide that had been compiled by the SAHRC.

The Guide contains information reasonably required to assist any person who wishes to exercise any right as contemplated in PAIA and has been designed as a guiding, user-friendly and accessible tool. The Guide is available in each official language for inspection at the office of the Information Regulator, during normal office hours or is accessible on the website at https://inforegulator.org.za/paia-guidelines/.

Contact details are as follows:

Post: JD House, 27 Stiemens Street,

Braamfontein, Johannesburg,

2001.

P.O Box 31533, Braamfontein, Johannesburg,

2017

Telephone: 010 023 5200

Website: https://inforegulator.org.za/

E-mail: enquiries@inforegulator.org.za

A copy of the Guide is available in English and isiZulu for free public inspection, during normal office hours, at Aon's head office. Alternatively, a written request for a free copy of the Guide may be submitted to Aon's Information Officer, whose contact details appear in section 5 above, using the Form located at **Annexure H** to this Manual.

7. Records available under other Legislation

7.1 The following information is available in terms of the following pieces of legislation. Please note this list is not exhaustive.

Legislation	Record
Basic Conditions of Employment Act 75 of 1997, Labour Relations Act 66 of 1995,	Employment records.
Code of Good Practice on Harassment, Skills Development Levies Act 9 of 1999,	
Unemployment Insurance Act 63 of 2001, Skills Development Act 9 of 1998 and the	
Promotion of Equality and Prevention of Unfair Discrimination Act 4 of 2000	
Broad Based Black Economic Empowerment Act 75 of 1997	BBBEE certificate.
Companies Act 61 of 1973	CIPC records
Compensation for Occupational Injuries and Disease Act 130 of 1993	Certificate
Financial Advisory and Intermediary Services Act 37 of 2002, Short-Term Insurance	FSCA Licence, Statutory disclosure and
Act 53 of 1998, Long term insurance Act 52 of 1998 and Insurance Act 2017,	related financial services information.
Policyholder Protection Rules	
Financial Intelligence Centre Act amendment 38 of 2001, Prevention of Organised	Registration records.
Crime Act, PRECCA and POCDATARA	

Income Tax Act 58 of 1962, SARS Practice/General Notes and Value Added Tax	SARS registration and records.
Act 89 of 1991.	
Medical Schemes Act 31 of 1998 and Medical Scheme Amendment Act 55 of 2001.	Registration records.
Occupational Health and Safety Act 85 of 1999	Regulatory appointments.
Promotion of Access to Information Act 2 of 2000	PAIA Manual
Protection of Personal Information Act 4 of 2013	Registration records, Privacy Notices
	and Privacy Statements.

8. Information automatically available

- 8.1 The following categories of Records are automatically available for inspection, purchase or photocopying.
- 8.2 Request forms for these categories of information are available on the website as well as from Aon's Information Officer, whose contact details appear in section 5 of this Manual:

Category of records Types of the Record		Available on Website	Available on request
General information pertaining to Aon	Company information, BBBEE level.	X	X
Services and product information;	Brochures, marketing material, newsletters, articles and/or media statements.	X	X
Operational documents/information	PAIA Manual and Forms, Scope of Work Template.	X	X
Human Resources	Job advertisements	X	X

A requestor may request a copy of a record described above and which will be provided subject to the payment of the fee for reproduction.

9. Subjects and categories of information held by Aon

Aon holds the categories of information set out below which are available for inspection in terms of PAIA. The procedure in terms of which such Records may be requested from Aon is set out in Section 10 of this Manual. The Records listed below will not in all instances be provided to a Requester who requests them in terms of PAIA as the Requester is required to identify the right the Requester is seeking to exercise or protect and to provide an explanation of why the requested Record is required for the exercise or protection of that right. Furthermore, the request may be denied on the basis of the grounds of refusal under PAIA.

Category	Subject
----------	---------

Financial Tax and Regulatory Records

Monthly statements, annual statements, monthly management accounts, trial balances, general ledgers, income tax returns, provisional tax returns, annual budget agendas and minutes of finance meetings, invoices, cash books, cheque requests, journals, bank statements, reconciliations, debit/credit notes, ledger trial balances, foreign exchange documentation, VAT returns, asset register licenses, trademarks, service manuals, safety manuals, record of incidents, PAYE, VAT, Regional Services Levies, Skills Development Levies, IRP2 and IRP5 documentation.

Company's Act and Contract documents

Memorandum and articles of association, share register, agendas, and minutes of board meetings, agendas and minutes of audit committee meetings, agendas and minutes of remuneration committee meetings, agendas and minutes of executive committee meetings, annual reports, lease agreements, rental agreements, service agreements and other agreements, dividend payments.

Operational Documents and Information

Client financial and operational documents, client business plans, client surveys, financial record slips (underwriting information), note/minutes of meetings, minutes of Trustee meetings, quotations from underwriters, recantation to clients presentations to insurers, presentation to potential clients, client documentation, contract broking/agency/intermediary documentation, policy wordings and endorsements cover records, general marketing and promotional information, debit/credit notes, statements, general correspondence, computer data records, client claims, files (including claims report forms and correspondences), assessors' reports, specialists' reports, medical reports, minutes of client meetings, invoices, notes, claims, authorization of payments, presentations to clients, brochures, performance records, product sales records, marketing plans and strategies.

Category

Human Resources

Offers of employment, applications for employment, contracts of employment, consultancy agreements, employee particulars, pension/provident fund application forms and death benefit beneficiary nominations, Workmen's compensation documentation, personnel policies, performance evaluations, job specifications, code of business ethics, employment equity plan, employee medical aid scheme documentation, employee pension fund documentation, disciplinary procedures and records, employee performance appraisals, loan and bursary agreements, payroll reports, training material, leave forms, Medical Schemes Act documentation, employee accreditation documentation, FAIS employee accreditation documentation, long service awards.

Information Technology

Software program and licensee, software application, contracts with computer suppliers and vendors, project documentation specifications, budgets, system documentation, escrow software documentation and manuals, reports and report definitions, invoices from suppliers and vendors, disaster recovery plans and procedures, all electronic documents, database systems with client information, internet connectivity, inter-company emails, Lotus Notes.

10. Procedure for requesting information not automatically available

Subject

- 10.1 A request must be made in the prescribed form as detailed in section 53 of PAIA. The procedural requirements are set out in this section. A copy of the form is attached marked **Annexure A**.
- 10.2 These forms are also electronically available from:
 - 10.2.1 Aon's Information Officer (whose contact details are in section 5 of this Manual); and
 - 10.2.2 the Information Regulator website https://inforegulator.org.za/wp-content/uploads/2020/07/InfoRegSA-PAIA-Form02-Reg7.pdf
- 10.3 The prescribed form should be submitted to the Information Officer at the nominated address or email address, the Information Officer shall deal with the request him/herself or hand it to a designated person to deal with the request.
- 10.4 In certain instances there is a prescribed fee (payable in advance where applicable) for requesting and accessing information in terms of PAIA. A Requester may also be called upon to pay the additional fees prescribed by regulations for searching for and compiling the information that is requested, including the costs of making copies of the information.
- 10.5 The Information Officer, as soon as reasonably possible and within thirty (30) days after the request has been received, shall decide whether or not to grant the request.
- 10.6 The Requester shall be informed of the decision by the Information Officer, including fees payable, in the manner indicated by the Requester in the prescribed Form 3, as per Regulation 8. Noting that a request for a copy of the Guide may not be refused. Please refer to **Annexure I** for a copy of the prescribed Form.
- 10.7 Notwithstanding the aforegoing, Aon will advise the Requester in the manner stipulated by the Requestor in the prescribed form of:
 - 10.7.1 the access fee to be paid;
 - 10.7.2 the format in which access will be given.
- 10.8 After access is granted, actual access to the Record requested will be given as soon as reasonably possible.
- 10.9 If the Request for Access to a Record is denied, the Requester is entitled to apply to a court for relief within 180 days of notification of the decision. Such relief may include any order compelling the Record or Records requested to be made available to the Requester or for another appropriate order. The court will determine whether the Records should be made available or not. The Requester may also lodge a complaint with the Information Regulator against the refusal of the request.
- 10.10 The Requester may also approach the Information Regulator and lodge a complaint in accordance with section 74 of POPIA in the prescribed form against the access fee to be paid or the form of access granted. The details of the Information Regulator are as follows:

JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001.

P.O Box 31533, Braamfontein, Johannesburg, 2017

Email: PAIAComplaints@inforegulator.org.za

- 10.11 Aon does not have any internal appeal procedures. As such, the decision made by the Information Officer is final and Requesters will have to exercise the external remedies at their disposal in the event that a Request for Access is refused.
- 10.12 In the event that the request is refused the Information Officer shall advise the Requester in writing, in a notice of refusal and the notice of refusal shall state the following:
 - 10.12.1 adequate reasons for the refusal;
 - 10.12.2 that the Requestor may lodge an appeal with a court of competent jurisdiction against the refusal of the request (including the period) for lodging such appeal or lodge a complaint with the Information Regulator.
- 10.13 Upon the refusal by the Information Officer, the deposit paid by the Requester will be refunded.
- 10.14 If the Information Officer fails to respond within thirty (30) days after a request has been received it is deemed in terms of section 58 read other with section 56 (1) of PAIA, that the Information Officer has refused the request.
- 10.15 The Information Officer may decide to extend the initial period of thirty (30) days for another period of not more than thirty (30) days if:
 - 10.15.1 The request is for a large number of Records; or
 - 10.15.2 The search for the Records it to be conducted at premises not situated in the same town of city as the head office of Aon; or
 - 10.15.3 Consultation among branches, divisions, or departments, as the case may be, is required; or
 - 10.15.4 The Requester consents to such an extension in writing; or
 - 10.15.5 The parties agree in any other manner to such an extension.
- 10.16 Should Aon require an extension of time; the Requester shall be informed in the manner stipulated in the prescribed form of the reasons for the extension. In the case of an extension of the time limit, the Requester has the right to lodge a complaint with the Information Regulator by following the process and completing the form prescribed by POPIA. The Requester may also make an application with a court against the extension.
- 10.17 It is important to note that access to information is not guaranteed the Requester must identify the right she/he/it is seeking to protect and explain why the Record requested is required for the exercise or protection of that right. The Request for Access form must be completed with enough particularity to at least enable the Information Officer to identify the following:
 - 10.17.1 The Record/s requested;
 - 10.17.2 The identity of the Requester;
 - 10.17.3 The form of access that is required, if the request is granted;
 - 10.17.4 The postal address or fax number of the Requester; and
 - 10.17.5 The right that the Requester is seeking to protect and an explanation as to why the Record is necessary to exercise or protect such a right.
- 10.18 If, in addition to a written reply from the Information Officer, the Requester wishes to be informed of the decision on the Request for Access in any other manner, the Requestor must state the manner and the particulars so required.
- 10.19 If a Request for Access is made on behalf of another person, the Requester must submit proof of the capacity in which the Requester is making the request to the reasonable satisfaction of the Information Officer.
- 10.20 If an individual is unable to complete the prescribed form because of illiteracy or disability, such a person may make the request orally.
- 10.21 The prescribed fee for reproduction of the Record requested by a Personal Requestor will be charged in accordance with section 54(6) of PAIA.
- 10.22 If the search for a Record of Aon in respect of which a Request for Access by a Requester has been made; and the preparation of that Record for disclosure would, in the opinion of the Information Officer, require more than

- the 6 hours prescribed for this purpose, the Information Officer must by notice require the Requester to pay as a deposit the prescribed portion (being not more than one third) of the access fee which would be payable should the request be granted.
- 10.23 The Requester may lodge a complaint with the Information Regulator or make an application to court against the tender of the request fee or the tender or payment of a deposit, as the case may be.
- 10.24 If the Requester's interest affects a third party then Aon will first need to inform the third party within 21 days of receiving the request and the third party will have 21 days to make representations and/or submissions regarding the granting of access to the Record. If the Information Officer does decide to grant access to the Record after considering these submissions, the third party that has been affected has 30 days in which to appeal the decision in the High Court or to lodge a complaint with the Information Regulator in accordance with section 74 of POPIA in the prescribed form. If no appeal or complaint is lodged within 30 days, the Requester must be granted access to the Record.

11. Information of records not found

- 11.1 If a requested Record cannot be found or if the Records do not exist, the Information Officer shall, by way of an affidavit or an affirmation, notify the Requester that it is not possible to give access to the requested Record.
- 11.2 The affidavit or affirmation shall provide an account of all reasonable steps taken to find the Record or to determine its existence.
- 11.3 This notice will be regarded as a decision to refuse a Request for Access to the Record concerned for the purpose of PAIA.
- 11.4 If the Record should later be found the Requester shall be given access to Record in the manner stipulated by the Requester in the prescribed from unless access in refused by the Information Officer.
- 11.5 The attention of the Requester is drawn to the provisions of Chapter 4 of PAIA in terms of which Aon may refuse, on certain specified grounds, to provide information to a Requester. The grounds for refusal are set out in clause 11 below.

12. Grounds for Refusal

- 12.1 There are various grounds upon which Aon may or must refuse a Request for Access to a Record in accordance with Chapter 4 of PAIA. They are:
 - 12.1.1 the protection of Personal Information of a third person (who is a natural person, including a deceased person) from unreasonable disclosure (section 63 of PAIA);
 - 12.1.2 the protection of commercial information of a third party if the Records contain trade secrets, financial, commercial, scientific or technical information that may harm the commercial or financial interests of a third party (section 64 of PAIA):
 - 12.1.3 refusing access to a Record if disclosure would result in the breach of a duty of confidence owed to a third party (section 65 of PAIA);
 - 12.1.4 refusing access to a Record if it would jeopardise the safety of an individual or prejudice or impair certain property rights of a third person (section 66 of PAIA);
 - 12.1.5 refusing access to a Record that was produced during legal proceedings, unless that legal privilege has been waived (section 67 of PAIA);
 - 12.1.6 refusing access to a Record containing trade secrets, financial or sensitive information or any information that would put the Private Body at a disadvantage in negotiations or prejudice it in commercial competition (section 68 of PAIA);
 - 12.1.7 refusing access to a Record containing information about research being carried out or about to be carried out on behalf of a third party (section 69 of PAIA).
- 12.2 Section 70 of PAIA contains an overriding provision. Disclosure of a Record that has been requested is compulsory if it would reveal a substantial contravention of, or failure to comply with the law, or imminent and serious public safety or environmental risk and the public interest in the disclosure of the Record clearly outweighs the harm contemplated by its disclosure.

13. Protection of Personal Information that is processed by Aon

13.1 Conditions for Lawful Processing

Chapter 3 of POPIA sets out the Conditions for Lawful Processing of Personal Information which must be

complied with when a Responsible Party Processes Personal Information. Below is a description of the eight Conditions for Lawful Processing as contained in POPIA:

a) Accountability

POPIA provides that the Responsible Party is obliged to ensure that the Conditions for Lawful Processing and all other measures required in terms of POPIA are complied with.

b) Processing limitation

The Processing must be done lawfully and in a manner that does not infringe the right to privacy of a Data Subject. Personal Information may only be Processed if, given the purpose for which it is Processed, it is adequate, relevant and not excessive. There must furthermore be a justification for Processing Personal Information. Consent is one of the justifications but Personal Information may be Processed in the absence of consent if it is necessary for pursuing the legitimate interests of the Responsible Party or the third party to whom it is disclosed or for the protection of the legitimate interests of the Data Subject. It may also be Processed if it complies with an obligation imposed by law or where it is necessary for the performance of a contract. The Processing of Special Personal Information or Personal Information of children generally requires consent, subject to certain limited exceptions.

c) Purpose specification

POPIA provides that Personal Information must be collected for a specific, explicitly defined and lawful purpose related to a function or activity of the Responsible Party. Subject to certain exceptions, Records of Personal Information must not be retained for longer than is necessary to achieve the purpose for which it was collected or subsequently Processed and must be destroyed or deleted once the Responsible Party is no longer authorised to retain the Record. Such exceptions include where (i) the retention is required or authorised by law, (ii) the Data Subject has consented to the retention, or (iii) the Personal Information is being retained for historical, statistical or research purposes.

d) Further Processing Limitation

POPIA provides that the further Processing of Personal Information must be in accordance with or compatible with the purpose for which the Personal Information was collected.

e) Information quality

A Responsible Party must take reasonably practicable steps to ensure that Personal Information is complete, accurate, not misleading and updated where necessary.

f) Openness

A Responsible Party is required to maintain the documentation of all Processing operations under its responsibility as required in terms of PAIA and must take reasonably practicable steps to ensure that the Data Subject is made aware of the Personal Information being collected, together with other stipulated information, subject to certain exceptions.

g) Security safeguards

POPIA provides that a Responsible Party must secure the integrity and confidentiality of Personal Information in its possession or under its control by implementing appropriate, reasonable technical and organisational measures to prevent the loss of damage to or unauthorised destruction of Personal Information, or unlawful access to or Processing of Personal Information. In addition, the Responsible Party should take all reasonable measures to identify all reasonably foreseeable internal and external risks, establish and maintain appropriate safeguards against risks identified, verify that the safeguards are effectively implemented and ensure that the safeguards are updated in response to new risks.

h) Data subject participation

A Data subject is entitled to request a Responsible Party to confirm whether or not it holds Personal Information about the Data Subject, and to request the Record itself or a description of the Record, subject to the requirements in PAIA. A Data Subject may also request a Responsible Party to correct or delete Personal Information that is inaccurate, irrelevant, excessive, out of date, incomplete, misleading, obtained unlawfully, or to destroy or delete personal information that a Responsible Party is no longer authorised to retain.

13.2 Purpose of the Processing of Personal Information by Aon

The purposes for which Aon Processes or will Process Personal Information is set out in Annexure B.

13.3 Categories of Data Subjects and Personal Information/Special Personal Information relating thereto

As per section 1 of POPIA, a Data Subject may either be a natural or a juristic person. The categories of Data Subjects in relation to which Aon Processes Personal Information are set out in **Annexure C**.

13.4 Recipients or categories of recipients of Personal Information

The following are the recipients to whom Aon may provide a Data Subject's Personal Information:

Category of personal Information	Recipients or categories of Recipients to whom the personal information may be supplied
Operational Documents and Information, Contact details, address, names, registration and/or Banking details, Contract documents.	Various vendors or suppliers.
Contact details, address, names, registration number, Operational Documents and Information, License details, Banking details, Contract documents.	Service providers.
Company's Act and Contract documents, Operational Documents and Information, Human Resources, Information Technology.	Companies within Aon's group of companies.
Operational Documents and Information, Contact details, Information Technology, License details, banking details.	Insurance companies.
Financial Tax and Regulatory Records Information Technology, Human Resources, Operational Documents and Information, Returns and /or Regulatory submissions.	Regulator or Government institution (if requested).

13.5 Cross-border flows of Personal Information

- 13.5.1 Section 72 of POPIA provides that Personal Information may only be transferred by a Responsible Party to a third party in a foreign country outside of the Republic of South Africa in the following circumstances:
 - a) If the third party who is the recipient of the Personal Information is subject to a law, binding corporate rules or a binding agreement which provide an adequate level of protection that effectively upholds principles similar to the Conditions for Lawful Processing under POPIA, including provisions relating to the further transfer of Personal Information from the recipient to third parties who are in a foreign country; or
 - b) If the Data Subject consents to the transfer of their Personal Information; or
 - c) If the transfer is necessary for the performance of a contractual obligation between the Data Subject and the Responsible Party; or
 - d) If the transfer is necessary for the conclusion or performance of a contract between the Responsible Party and a third party, concluded in the interests of the Data Subject; or
 - e) If the transfer is for the benefit of the Data Subject, and it is not reasonably practicable to obtain the consent of the Data Subject, and if it were, the Data Subject, would in all likelihood provide such consent.
- 13.5.2 **Annexure D** contains a list of the planned cross-border transfers of Personal Information and the iustification for such transfers.
- 13.5.3 Aon has entered into an agreement with all its offices and its affiliates to ensure that Personal Information shared with other entities within its group is adequately protected.

13.6 Description of information security measures to the implemented by Aon

The types of security measures implemented by Aon in order to secure the integrity and confidentiality of the Personal Information and ensure that Personal Information is protected from loss, damage, unauthorized destruction or unlawful access are listed in **Annexure E** hereto.

13.7 Objection to the Processing of Personal Information by a Data Subject

Section 11(3) of POPIA and Regulation 2 of the POPIA Regulations provides that a Data Subject may object to

Processing in the prescribed form attached as **Annexure F** to this Manual where the Processing is based on one of the following grounds, unless legislation provides for such Processing:

- 13.7.1 Processing protects a legitimate interest of the Data Subject;
- 13.7.2 Processing is necessary for pursuing the legitimate interests of the Responsible Party or of a third party to whom it is supplied;
- 13.7.3 Processing is for purposes of direct marketing other than direct marketing by means of unsolicited electronic communications as referred to in section 69 of POPIA.

13.8 Request for correction or deletion of Personal Information

Section 24 of POPIA and Regulation 3 of the POPIA Regulations provides that a Data Subject may request for their Personal Information to be corrected/deleted in the prescribed form attached as **Annexure G** to this Manual.

14. Access to Health or other records

- 14.1 If the Information Officer who grants a Request for Access to a Record provided by a health practitioner in his capacity as such about the physical or mental health, or well-being:
 - 13.1.1 of the Requester; or
 - 13.1.2 if the request has been made on behalf of the person whom the Record relates, of that person.
- 14.2 If such health practitioner is of the opinion that the disclosure of the Record to the Requester would be likely to cause serious harm to such person's physical or mental health or well-being, the Information Officer may only give access to the Record if the Requester provides that adequate provision has been made for such counselling as may be necessary in the circumstances.
- 14.3 Before access to the Record is so given to the Requester, the person responsible for such counselling must be given access to the Record.

15. Updating of Manual

Aon will update this manual annually or at such intervals as may be necessary.

Policy Sponsor	Title
Exco Member	Chief Legal and Compliance Counsel, South Africa, and Sub Sahara Africa
Legal & Compliance	Compliance Manager

TO:	Tanya Prozzi The Information Offic	cer Aon				
	The Place 1 Sandton Drive Sandhurst, Sandton,	, 2196 Johannesk	ourg			
	PO Box 78367 Sandton, 2146					
	Telephone: 08	60 100 404				
	Email: comments@	aon.co.za				
	roof of identity must be			such authoris	sation, must b	e attached to this form.
Mark v	vith an "X"					
	Request is made i	n my own name		Reques	st is made on	behalf of another person.
		PE	RSONAL INF	ORMATION		
Full Na	ames					
Identity	y Number					
made of anot	ity in which request is (when made on behalf ther person)					
Postal	Address					
Street	Address					
E-mail	Address					
		Tel. (B):			Facsimile:	
Contac	ct Numbers	Cellular:				
whose	ames of person on behalf request is (if applicable):					
Identity	y Number					
Postal	Address					
Street	Address					

Annexure A:

[Regulation 7]

REQUEST FOR ACCESS TO RECORD

E-mail Address					
Contact Numbers	Tel. (B)		Facsimile		
	Cellular	'			
	he record to to be locate	RTICULARS OF RECORD REQUESTED which access is requested, included. (If the provided space is inaded pages must be signed.)	ling the refere		
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	ו "X ")		
Record is in written or prin	ted form				
Record comprises virtual generated images, sketche		his includes photographs, slides	s, video reco	rdings, computer-	
Record consists of recorde	ed words or	information which can be reprodu	ced in sound		
Record is held on a computer or in an electronic, or machine-readable form					

FORM OF ACCESS	
(Mark the applicable box with an " X ")	
Printed copy of record (including copies of any virtual images, transcriptions and information held on computer or in an electronic or machine-readable form)	
Written or printed transcription of virtual images (this includes photographs, slides, video recordings, computer-generated images, sketches, etc)	
Transcription of soundtrack (written or printed document)	
Copy of record on flash drive (including virtual images and soundtracks)	
Copy of record on compact disc drive(including virtual images and soundtracks)	
Copy of record saved on cloud storage server	
MANNER OF ACCESS (Mark the applicable box with an "X")	
Personal inspection of record at registered address of public/private body (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)	
Postal services to postal address	
Postal services to street address	
Courier service to street address	
Facsimile of information in written or printed format (including transcriptions)	
E-mail of information (including soundtracks if possible)	
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)	
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

PARTICULARS OF RIGHT TO BE EXERCISED OR PROTECTED		
If the provided space is inac	dequate, 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:				
Ü				
	FE	EES		
a) A request fee must be paid before the request will be considered.				
	of the amount of the access	fee to be paid. s on the form in which access is required and the		
reasonable time red	quired to search for and prep	are a record.		
	emption of the payment of ar	ny fee, please state the reason for exemption		
Reason				
ou will be notified in writing wequest, if any. Please indicat		en approved or denied and if approved the costs relating to y		
	•	onespondence.		
Postal address	Facsimile	Electronic communication (Please		
		specify)		
Oi-mar al at	Al-i-			
Signed at	this da	y of20		
Signature of Requester / po	erson on whose behalf req	uest is made		
	, 			
	FOR C	OFFICIAL USE		
Reference number:				
D				
Request received by: (State Rank, Name	And			
Surname of Information Office				
Date received:				
Access fees:				
Deposit (if any):				
Signature of Information O	fficer			

Annexure B: DESCRIPTION OF PURPOSES OF PROCESSING PERSONAL INFORMATION

Affinity Personal Lines

- to provide a quotation for personal insurance to the clients.
- to issue a personal insurance policy to clients.
- to maintain and service the policy.
- to collect premiums in respect of the policy.
- to process claims in respect of the policy.
- · for reporting purposes.
- to perform in accordance with the deliverables in the client services agreement (TOBA).
- to comply with certain disclosure requirements.
- to identify children (dependants) of the existing/potential policy holder who shall be named the beneficiaries for polices.

Commercial (Inland and Coastal)

- to facilitate the sale of insurance policies.
- for the management of claims and the policy from inception.
- to comply with certain disclosure requirements.
- to identify children (dependants) of the existing/potential policy holder who shall be named the beneficiaries for polices.
- · for underwriting requirements.
- for purposes of communication with the Data Subject.

Corporate

- to assess underwriting risks.
- · to process claims.
- for risk consulting.
- for risk analysis insurance care / protection.
- for renewal management of clients polices.
- to comply with the disclosure requirements.

Employee Benefits (Healthcare and Retirement Fund and Group Risk consulting)

- for record purposes enabling Aon to identify and complete a CRM process and to allow for further communication with clients when required.
- to comply with a legal obligation on Aon to record client's nature of request, Aon's actions, and closures of requests.
- for assistance for the underwriting of medical schemes and to ensure that the member is placed on the correct option.
- to comply with other disclosure requirements.
- to identify children (dependents) of the existing/potential policy holder who shall be named the beneficiaries for polices.
- to capture and create online record for TBS statements/access.

Operations

- to facilitate the sale of insurance policies.
- for the management of claims and the policy from inception.
- to comply with certain disclosure requirements.
- for underwriting requirements.
- for purposes of communication with the Data Subject.
- for renewal management of clients polices.
- to perform in accordance with the deliverables in the client services agreement (TOBA).
- to maintain and service the policy.
- to collect premiums in respect of the policy.
- to process claims in respect of the policy.
- for reporting purposes.

Retirement Funding (exited business)

- for the delivery of the service to the corporate clients.
- for purposes of data capturing in terms of applicable laws.

Employees:

- for carrying out and managing Aon's business operations.
- for compliance with legal obligations.
- for administering and maintaining personnel records, including occupational health & safety records.
- for paying and reviewing salary, expenses and any other administration of remuneration and benefits.
- for providing and administering benefits (including, if relevant, pension, life assurance, income protection insurance, medical insurance, and share schemes).
- for undertaking performance management, talent management, succession planning, training and development, disciplinary and grievance procedures, and associated investigations.
- for managing business travel.
- for purposes of corporate security and surveillance and archiving of emails for disaster recovery purposes.
- for maintaining leave and other absence records.
- for monitoring employment equity and BBBEE obligations and support legal reporting.
- for providing information to regulatory bodies and tax authorities.
- for supplying information in terms of potential mergers and acquisitions.
- for posting information on Aon's microsite, portals, website and on social media platforms.
- for the processing of third parties and correspondent's cross border.
- for pursuing any other of Aon's legitimate business interests.

Annexure C: DESCRIPTION OF DATA SUBJECT OR CATEGORY OF DATA SUBJECTS AND CATEGORIES OF PERSONAL INFORMATION IN RELATION TO THE DATA SUBJECTS*

Data Subject or Category of Data Subject	Description of Personal Information processed in
	relation to Data Subject
Employees including Company directors and job applicants	 Name, Identity number, Marital status, Number of children/dependents, Names of children, Medical aid details, Pension fund details, Tax number, Physical and postal address, Emergency contact details Identity records, Photographs, Reference codes, Credit history, Education and professional experience, Employee travel and expense information, Family information, Gender, Banking details, CV, Driver's licence,
	Payslip,
	Biometric information.
Third party service providers, including medical aid	Full names,
providers, suppliers/ vendors	 Identity numbers of natural persons and registration numbers of juristic persons; date of birth, Contact details: physical and postal addresses; email addresses, private and work telephone numbers, Identifying factors: gender, race, colour, marital status, age, language, Information relating to education, Employment and education history of a person, Health information: health status, pregnancy, disability, Criminal history, Financial information, Personal opinions, views, preferences, Correspondence and confidential information, Companies' constitutional documents relating to shareholder and board member obligations, Vat registration details.
Clients, suppliers, service providers	 Full names, Company information and contact details, Biometric information, Details for postage and parcel deliveries, CCTV footage, Vehicle registration number, Vehicle details and value,
	Identity number,Passport number, expiry date of passport,

	Mobile contact number,
	Physical and postal addresses,
	Email addresses,
	 Private and work telephone numbers,
	Identity numbers of natural persons,
	The total sum of insured of assets,
	Electronic signatures,
	Marital status,
	National origin,
	Age,
	• Language,
	Employment, Original history,
	Criminal history, Criminal history,
	Financial information,
	 Companies' constitutional documents relating to shareholder and board member obligations
	 Insurance policy details,
	 High-value assets subject to underwriting,
	Banking details,
	 Information relating to education,
	 Employment and education history of a person,
	 Health information: health status, pregnancy, disability,
	Religious or philosophical beliefs,
	Trade union membership,
	Personal opinions, views, preferences,
	 Correspondence and confidential information.
Visitors to Aon's websites and platforms	
Visitors to Aorra websites and platforms	·
	Company information,Contact details,
	,
	Cookie information,
	IP address,
	Password and log in details,
	Payment information.
Shareholders and board members of Aon	Board Member photo,
	Full Names and title,
	Qualifications,
	Employment History.
*The above list is not exhaustive and may change f	rom time to time.

Annexure D: CROSS-BORDER FLOWS OF PERSONAL INFORMATION

Country	Justification for Transfer (in terms of section 72 of POPIA)	Categories of personal information
Ireland	Intra-group data transfer agreement	Financial, Tax and Regulatory Records, Company's and Contract documents, Operational Documents and Information, Human Resources, Information Technology.
France	Intra-group data transfer agreement	Operational Documents and Information, Information Technology.
Netherlands	Intra-group data transfer agreement	Operational Documents and Information.
Germany	Intra-group data transfer agreement	Operational Documents and Information, Information Technology.
Australia	Intra-group data transfer agreement	Operational Documents and Information
India	Intra-group data transfer agreement	Financial, Tax and Regulatory Records, Operational Documents and Information, Human Resources. Information Technology.
Poland	Intra-group data transfer agreement	Operational Documents and Information, Financial, Tax and Regulatory Records Human Resources. Information Technology
United Kingdom	Intra-group data transfer agreement	Financial, Tax and Regulatory Records, Operational Documents and Information.
United States of America	Intra-group data transfer agreement	Financial, Tax and Regulatory Records, Operational Documents and Information, Human Resources,
European Union	Intra-group data transfer agreement	Financial, Tax and Regulatory Records, Company's Act and Contract documents, Operational Documents and Information, Human Resources,

Annexure E: SECURITY MEASURES TO BE IMPLEMENTED BY AON

The security of your personal information is important to us and Aon has implemented reasonable physical, technical and administrative security standards to protect personal information from loss, misuse, damage, alteration or destruction.

The following is a list of the types of security measures implemented by Aon in order to ensure that Personal Information is protected from loss of, damage to or unauthorized destruction of or unlawful access to Personal Information which is not exhaustive in nature:

- We protect your Personal Information against unauthorized access, processing, use or disclosure, using security technologies and procedures, such as encryption and limited access.
- Only authorized individuals access your Personal Information, and they receive training about the importance of protecting Personal Information.
- Our service providers and agents are contractually bound to maintain the confidentiality of Personal Information and may not use the information for any unauthorized purpose.
- Password Protection.
- · Data Encryption.
- 2- Factor authentication.
- Anti-virus.
- Anti-malware solutions.
- Cyber security solutions.

Annexure F: FORM FOR THE OBJECTION TO THE PROCESSING OF PERSONAL INFORMATION IN TERMS OF POPIA

Objection to the processing of Personal Information in terms of Section 11(3) of the Protection of Personal Information Act, 2013 (ACT NO. 4 of 2013)

Regulations relating to the Protection of Personal Information, 2017 [Regulation 2(1)]

Note:

- 1. Affidavits or other documentary evidence in support of the objection must be attached.
- 2. If the space provided for in this Form is inadequate, submit information as an Annexure to this Form and sign each page.

Reference Number:

ata subject
Code ()
onsible party
Code ()

Name	of public or Private Body	(if the Responsible	Party is not a natural pe	erson):	
Busin	ess address:				
Code	:()				
Conta	ct number(s):				
Fax n	umber:				
E-mai	l address:				
С	Reasons				
Signe	ed at	this	day of	20	
Signa	ture of Data Subject (ar	onlicant)			

Annexure G: FORM FOR THE REQUEST TO DELETE OR CORRECT PERSONAL INFORMATION IN TERMS OF POPIA

Request for correction or deletion of personal information or destroying or deletion of record of personal information in terms of Section 24(1) of the Protection of Personal Information Act, 2013 (ACT NO. 4 OF 2013)

Regulations relating to the Protection of Personal Information, 2017, [Regulation 3(2)]

Note:

- 1. Affidavits or other documentary evidence in support of the request must be attached.
- 2. If the space provided for in this Form is inadequate, submit information as an Annexure to this Form and sign each page.

Reference Number

Mark the appropriate box with an "x".

Request for:

Reference Number:

- Correction or deletion of the Personal Information about the Data Subject which is in possession or under the control
 of the Responsible Party.
- Destruction or deletion of a Record of Personal Information about the Data Subject which is in the possession or under the control of the Responsible Party and who is no longer authorised to security the Record of information.

A Details of the da	ata subject
Surname:	
Full names:	
Identity number:	
Residential, postal or	
business address:	
	Code ()
Contact number(s):	
Fax number:	
E-mail address:	

В	Details of the	e responsible party
responsi	nd surname of ble party (if the ble party is a erson):	
Resident business	ial, postal or address:	
		Code ()
Contact	number(s):	
Fax num	ber:	
E-mail ad	ddress:	

Name of public or Private Body	(if the Bosponsible	Party is not a	notural nargan):
Marrie of public of 1 fivate body	(ii tile ixespolisible	i aity is not a	<u>naturai personj.</u>

Business address:

Code: ()

Contact number(s):

Fax number:

E-mail address:

Signature				
Signed at	this	day of	20	_
	ie <u>responsible pai</u>		railed reasons for the request)	
С			on about the data subject/*de subject which is in possess	

Annexure H: FORM FOR THE REQUEST FOR A COPY OF THE GUIDE

TO:

Tanya Prozzi Information Officer Aon South Africa (Pty) Ltd

	The Place 1 Sandton Drive Sandhurst, Sandton, Johannesburg	, 2196					
	PO Box 78367, San	dton, 2146					
	Telephone: 08	360 100 40	4				
	Email: <u>cc</u>	omments@	aon.co.za				
I,							
Full names:							
In my capacity a	s (mark with "x"):	Informati	on officer			Other	
Name of private	body (if applicable)						
Postal Address:							
Street Address:							
E-mail Address:							
Facsimile:			1				
Contact numbers	s:	Tel.(B):			Cellula	r:	
hereby request the	e following copy(ies)	of the Guid	le:				
Language (mark with "X") No of copies Language (mark with "X") No of copies					No of copies		
Sepedi		Sesotho					
Setswana					wati		
Tshivend					songa		
Afrikaans					glish		
isiNdebe	le			isiX	hosa		
isiZulu							
Manner of collection	on (mark with "x"):						
Personal collection	Postal a	address		Facsimi	ile	Electronic commu spec	
Signed at	thi	s	day of			_20	
Signature of reque	ester						

Annexure I: OUTCOME OF REQUEST AND OF FEES PAYABLE

[Regulation 8]

٨	1-	٠,	_	
n	ır)T	2	

- 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.

TO: _		Reference number:
_		- -
_		- -
Your reques	st dated, refers.	
1. You re	equested:	
Personal in recorded we electronic of inspection	nspection of information at registere words, information which can be repro or machine-readable form) is free of	ed address of public/private body (including listening to oduced in sound, or information held on computer or in an charge. You are required to make an appointment for the form with you. If you then require any form of reproduction is prescribed in Annexure B.
2 Vo.	was uponto di	OR
	u requested:	pies of any virtual images, transcriptions and information
	mputer or in an electronic or machine	
	printed transcription of virtual images generated images, sketches, etc)	s (this includes photographs, slides, video recordings,
Transcripti	on of soundtrack <i>(written or printed c</i>	document)
Copy of inf	formation on flash drive (including vir	tual images and soundtracks)
Copy of inf	ormation on compact disc drive (incl	luding virtual images and soundtracks)
Copy of red	cord saved on cloud storage server	
3. To	be submitted:	
Postal serv	vices to postal address	
Postal serv	vices to street address	
Courier ser	rvice to street address	
Facsimile of	of information in written or printed for	mat (including transcriptions)
E-mail of ir	nformation (including soundtracks if p	possible)
Cloud shar	re/file transfer	
Preferred I	anguage:	
	if the record is not available in the la n which the record is available)	nguage you prefer, access may be granted in the
Kindly note t	that your request has been:	
randly note t	mat your request has been.	
Appro	ved	
Denie	d, for the following reasons:	

4. Fees payable with regar	ds 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 (i) Flash drive To be provided by require (ii) Compact disc If provided by requestor If provided to the request	uestor	R40.00 R40.00 R60.00		
For a transcription of visual image Copy of visual images	es per A4-size page	Service to be outsourced. Will depend on the quotation of the service provider		
Transcription of an audio record,	per A4-size	R24.00		
Copy of an audio record (i) Flash drive To be provided by require (ii) Compact disc If provided by requestor If provided to the request Postage, e-mail or any other elections.	uestor	R40.00 R40.00 R60. 00		
TOTAL:		Actual costs		
5. Deposit payable (if sear Yes Hours of search	Amour	urs): In of deposit In a contract of total a	No	
nours or search	(Calcul	ated on one third of total e	imount per requesty	
The amount must be paid into the Name of Bank: Name of account holder: Type of account: Account number: Branch Code: Reference Nr: Submit proof of payment to:		unt:		
Signed at	_ this	day of	_ 20	

Information officer