PAIA MANUAL

FOR

Corporate Guarantee (South Africa) (RF) Limited

Compiled in terms of Section 51 of

The Promotion of Access to Information Act, Act 2 OF 2000

(As amended from time to time)

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The PAIA Manual is a working document that must be reviewed periodically.

Review will occur on at least an annual basis. Any amendments made, will be indicated on the document review roster and relevant staff members will be informed, accordingly.

Review Date	04 November 2025
Comments / Amendments	Branding and address
Next Review Date	2026
Responsible Person Signature	

1. INTRODUCTION

1.1. This manual is compiled in terms of the Promotion of Access to Information Act, No 2 of 2000 (“the Act”).

1.2. The Act gives effect to the constitutional right of access to information contained in section 32 of the Constitution of the Republic of South Africa.

1.3. In terms of the Act, private bodies are required to compile a manual as a guide to requesters of information.

This manual further serves to indicate the kind of records held by the Corporate Guarantee (South Africa) Ltd (“CGSA”) and the availability of such records from CGSA.

2. DEFINITIONS

PAIA means the Promotion of Access to Information Act 2 of 2000

POPI means the Promotion of Personal Information Act 4 of 2013

Information Regulator means the Regulator established in terms of Section 39 of POPI

Person means a natural person or a juristic person.

Private body means:

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

Public body means:

- any department of state or administration in the national or provincial sphere of government or any municipality in the local sphere of government; or
- any other functionary or institution when:
    - exercising a power or performing a duty in terms of the Constitution or a provincial constitution; or
    - exercising a public power or performing a public function in terms of any legislation

Head, in relation to, a private body means:

- in the case of a natural person, that natural person or any person duly authorised by that natural person.
- in the case of a partnership, any partner of the partnership or any person duly authorised by the partnership.
- in the case of a juristic person:
    - the chief executive officer or equivalent officer of the juristic person or any person duly authorised by that officer; or
    - the person who is acting as such or any person duly authorised by such acting person.

Information Officer means the head of a private body.

Requester in relation to a private body**,** means any person, including, but not limited to public body or an official thereof, making a request for access to a record of the organisation or a person acting on behalf of such person.

Personal Requester means a requester seeking access to a record containing personal information about the requester.

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: 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; information relating to the education or the medical, financial, criminal or employment history of the person; any identifying number, symbol, e-mail address, physical address, telephone number, location information, online identifier or other particular assignment to the person, the biometric information of the person; the personal opinions, views or preferences of the person; 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; the views or opinions of another individual about the person; and 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.

Request for access means a request for access to a record of the organisation in terms of section 50 of PAIA.

Record means any recorded information regardless of the form or medium, in the possession or under the control of the organisation irrespective of whether it was created by the organisation or not.

Data Subject means the person to whom personal information relates.

Third Party in relation to a request for access to a record held by the organisation, means any person other than the requester.

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, dissemination by means of transmission, distribution or making available in any other form, or merging, linking, as well as restriction, degradation, erasure or destruction of information.

3. ABOUT CGSA AND OBJECTIVES OF SAME

3.1. CGSA is a private company specialising as an Insurer in a non-life (Short-term) insurance.

3.2. The objectives of the CGSA are to:

3.2.1. Promote fair customer treatment for our policyholders by ensuring that we understand our client's needs and focus on cost-effective solutions.

3.2.2. Focus on contingency polices for our clients.

3.2.3. Assist in recommendations and ensuring that our solution provide peace of mind and comfort to clients in terms of their insurance risk.

4. THE PURPOSE OF THIS PAIA MANUAL

4.1 The purpose of this Guide is to provide information that is needed by any person who wishes to exercise any right contemplated in the Promotion of Access to Information Act of 2000 (PAIA) and Protection of Personal Information Act, 2013 ("POPIA"). Any person, irrespective of citizenship, can apply for access to information under PAIA.

4.2 This Guide will specifically assist a person, also called a data subject, on how to access his/her personal information in terms of section 23 of POPIA. Under POPIA, person or data subject has the right to –

4.2.1 request CGSA to confirm, free of charge, we hold personal information about them, and

4.2.2 request from CGSA the record or a description of the personal information about the data subject held by us, including information about the identity of all third parties, or categories of third parties, who have, or have had, access to the information.

4.2.3 request CGSA to –

I. correct or delete personal information about the data subject in our possession or under its control that is inaccurate, irrelevant, excessive, out of date, incomplete, misleading, or obtained unlawfully; or

II. destroy or delete a record of personal information about the data subject that CGSA is no longer authorised to retain.

4.4 This guide will also assist people in understanding how to challenge the granting of access to their records or how to participate in the process of accessing their records.

4.5 Check the categories of records held by CGSA which are available without a person having to submit a formal PAIA request.

4.6 Have a sufficient understanding of how to make a request for access to a record of CGSA, by providing a description of the subjects on which CGSA holds records and the categories of records held on each subject.

4.7 Know the description of the records of CGSA which are available in accordance with any other legislation.

4.8 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.

4.9 Know the description of the guide on how to use PAIA, as updated by the Regulator and how to obtain access to it.

4.10 Know if CGSA will process personal information, the purpose of processing personal information and the description of the categories of data subjects and of the information or categories of information relating thereto.

4.11 Know the description of the categories of data subjects and of the information or categories of information relating thereto.

4.12 Know the recipients or categories of recipients to whom the personal information may be supplied.

4.13 Know if CGSA 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

4.14 Know whether CGSA has appropriate security measures to ensure the confidentiality, integrity and availability of the personal information which is to be processed.

4.13 We are obliged to protect our client information and the inherent rights as identified in terms of the Constitution, PAIA and POPIA, safe for where provision is made where we may disclose the aforesaid information.

4.14 Further to the aforesaid, this manual will ensure protection of CGSA from compliance risks associated with protection, which includes the below but not limited to same:

a. Breaches of confidentiality. For instance, the organisation could suffer loss in revenue where it is found that the personal information of data subjects has been shared or disclosed inappropriately.

b. Failing to offer choice. For instance, all data subjects should be free to choose how and for what purpose the organisation uses information relating to them.

c. Reputational damage. For instance, the organisation could suffer a decline in shareholder value following an adverse event such as a computer hacker deleting the personal information held by the organisation.

4.15 This policy demonstrates the organisation's commitment to protecting the privacy rights of data subjects in the following manner:

a. Through stating desired behaviour and directing compliance with the provisions of POPIA and best practice.

b. By cultivating an organisational culture that recognises privacy as a valuable human right.

c. By developing and implementing internal controls for the purpose of managing the compliance risk associated with the protection of personal information.

d. By creating business practices that will provide reasonable assurance that the rights of data subjects are protected and balanced with the legitimate business needs of the organisation.

e. By assigning specific duties and responsibilities to control owners, including the appointment of an Information Officer and where necessary, Deputy Information Officers in order to protect the interests of the organisation and data subjects.

f. By raising awareness through training and providing guidance to individuals who process personal information so that they can act confidently and consistently.

The Promotion of Access to Information Act, 2000, gives effect to section 32 of the Constitution, which provides that everyone has the right to access information held by the State or any other person (or private body), when that information is required for the exercise or protection of any rights.

The purpose of PAIA is to:

- foster a culture of transparency and accountability in public and private bodies by giving effect to the right of access to information, and to
- actively promote a society in which the people of South Africa have effective access to information to enable them to more fully exercise and protect all of their rights.

The organisation recognises everyone's right to access to information and is committed to provide access to the organisation's records where the proper procedural requirements as set out by PAIA and POPI have been met.

5. CGSA CONTACT DETAILS (Section 51 (1) (a))

Persons designated/duly authorised persons:

Head of Organisation: Gerard Tromp

Information Officer: Wilna Ras

Telephone Number: 084 309 7665

Email Address: finance@corporateguarantee.co.za

Deputy Information Officer: Hennie Pretorius

Telephone Number: 066 246 8418

Email Address: md@corporateguarantee.co.za

Website: https://corporateguarantee.co.za/

Please note that CGSA's Information Officer physical and postal address as below:

Physical Address	**Postal Address**
Capital Park, Block A, Steyn City 2 Erling Road, Riverglen Midrand, 2191	P.O Box 2878 Randburg 2125
Telephone number: (011) 787 9019	

Requests for information and access to records not readily available, may be made by contacting the Information Officer or Deputy Information Officer.

6. GUIDELINES FOR ACCESS TO INFORMATION AS PROVIDED FOR IN SECTION 10 OF PAIA AND SECTION 57 OF POPIA

A guideline manual for how to use the PAIA manual has been compiled by the Information Regulator. This guide can be accessed directly from the Information Regulator as per the below information:

6.1. Website: https://inforegulator.org.za/
6.2. Postal address: P. O Box 31533, Braamfontein, Johannesburg, 2017
6.3. Physical address: JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001
6.4. Telephone: 010 023 5200
6.5. Email: PAIACompliance@inforegulator.org.za

A copy of the Guide is also available in the following two official languages, for public inspection during normal office hours- Afrikaans and English.

In the event that your personal information has not been processed in accordance with the POPI Act and the principles set out above, you have the right to lodge a complaint with the Information Regulator. For further information regarding the complaints process, please visit the website of the Information Regulator.

6.6. 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.

6.7. The Guide noted in 6.6 is available in each of the official languages and in braille.

6.8. The aforesaid Guide contains the description of

6.8.1. the objects of PAIA and POPIA.

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

6.8.2.1. the Information Officer of every public body, and

6.8.2.2. every Deputy Information Officer of every public and private body designated in terms of section 17(1) of PAIA and section 56 of POPIA.

6.8.3. the manner and form of a request for-

6.8.3.1. access to a record of a public body contemplated in section 11; and

6.8.3.2. access to a record of a private body contemplated in section 50.

6.8.4. the assistance available from the IO of a public body in terms of PAIA and POPIA.

6.8.5. the assistance available from the Regulator in terms of PAIA and POPIA.

6.8.6. 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-

6.8.6.1. an internal appeal

6.8.6.2. a complaint to the Regulator; and

6.8.6.3. 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

6.8.7. the provisions of sections 14 and 51 requiring a public body and private body, respectively, to compile a manual, and how to obtain access to a manual.

6.8.8. the provisions of sections 15 and 52 providing for the voluntary disclosure of categories of records by a public body and private body, respectively

6.8.9. the notices issued in terms of sections 22 and 54 regarding fees to be paid in relation to requests for access; and

6.8.10. the regulations made in terms of section 92.

6.9. Members of the public can inspect or make copies of the Guide from the offices of the public and private bodies, including the office of the Regulator, during normal working hours.

7. TYPES AND/OR CATEGORIES OF RECORDS HELD

7.1. Records made available in terms of applicable legislation.
Records are held and made available in terms of the legislation listed in under paragraph 7.3.

7.2. Records that are freely available
In terms of section 52(2) of the PAIA, the Minister may from time to time publish a Notice in the Government Gazette describing those records which are freely available. As of date of this Manual, no such Notice has been published that applies to CGSA.

7.3. Records held.

CATEGORIES OF RECORDS OF CGSA WHICH ARE AVAILABLE WITHOUT A PERSON HAVING TO REQUEST ACCESS ON OUR WEBSITE

https://corporateguarantee.co.za

Category of Record	Types of Record
Public Company information	About the company
	About the product
	The team & Board
	Group financial results
	Company philosophy
Regulatory & Administrative	PAIA Manual
	POPI Manual

DESCRIPTION OF THE RECORDS OF CGSA WHICH ARE AVAILABLE IN ACCORDANCE WITH ANY OTHER LEGISLATION

Category of Record	Applicable Legislation
Memorandum of incorporation	Companies Act
PAIA Manual	Promotion of Access to Information Act 2 of 2000
POPI Manual	Protection of personal information Act
Treating Customer Fairly Policy	Consumer Protection Act
Cyber Security and IT resilience Policy	Electronic Communications and Transactions Act
Transformation Policy	Employment Equity Act
FAIS Policies	Financial Advisory & Intermediary Services Act
Financial Recovery Plan	Financial Institutions (Protection of Funds) Act
FICA policies and CPD requirements	Financial Intelligence Centre Act
PAYE Records	Income Tax Act
Secured Advances	National Credit Act
Health and safety Policy	Occupational Health and Safety Act
Reportable Institution	Prevention of Organised Crime Act
Policy against combatting Money laundering and the financing of terrorist and related activities	Protection of Constitutional Democracy against Terrorist and related Activities Act
Client Policies	Short-term Insurance Act

SDL Records	Skills Development Act
UIF Records	Unemployment Insurance Act
VAT Records	Value Added Tax Act

DESCRIPTION OF THE SUBJECTS ON WHICH THE BODY HOLDS RECORDS AND CATEGORIES OF RECORDS HELD ON EACH SUBJECT BY CGSA	
Subjects on which the body holds records	**Categories of records**
Public Affairs	Public Product Information
	Public Corporate Records
Regulatory & Administrative	Permits, Licenses or Authorities
	Conflict of Interest Management Policy
	Complaints Policy
	FICA Internal Rules
	Health & Safety Plan
	Memorandum of Incorporation
	Minutes of Board or Directors Meetings
	Register of Board of Directors
	Internal correspondence (e-mails/memos)
	Insurance Policies held by organisation
Human Resources	Employment Applications
	Employment Contracts
	Personal Information of Employees
	Employment Equity Plan
	Disciplinary Records
	Performance Management Records
	Salary Records
	PAYE Records
	Seta Records
	Disciplinary Code

	Leave Records
	Training Records
	Training Manual
Financial	Financial Statements
	Financial and Tax Records
	Asset Register
	Management Accounts and Reports
	Vouchers, Cash Books and Ledgers
	Banking Records and Statements
	Electronic Banking Records
Marketing	Market Information
	Product Brochures
	Advertisements
	Performance Records
	Product / Service Sales Records
	Marketing Strategies
Client	Customer / Client Database
Customer	Customer / Client agreements
	Customer / Client Files
	Customer / Client Instructions
	Customer / Client Correspondence

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

Categories Data subjects	**Personal Information that may be processed**
Policyholders	name, address, registration numbers or identity numbers, employment/business information, banking details, contact details, insurance information.

Directors	name, address, qualifications, gender, and race, contact information, conflict of interest declaration, banking details
Employees	name, address, qualifications, gender, and race, contact information, banking details
Banking institutions	names, registration number, vat numbers, address, contact information, banking details
External companies and/or contractors	names, registration number, vat numbers, address, contact information, banking details
Third Parties	names, registration number, vat numbers, address, contact information, banking details
Auditors	names, registration number, vat numbers, address, contact information, banking details

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
Required information for suspicious transactions	Financial Intelligence Centre
Required information for tax submission	South African Revenue Services

8. GROUNDS FOR REFUSAL

In terms of the PAIA justifiable grounds exist for an entity to refuse or limit access to information.

Grounds for refusal include, but are not only limited to these, are:

- Personal information relating to individuals.
- Certain types of commercial information.
- Information that is deemed confidential.
- Information that is deemed privileged.

- Information relating to trade secrets.
- Information relating to copyright.
- Information relating to protected information technology.
- Where the requests are unreasonable, vexatious, or frivolous.
- Where the request is not in the prescribed manner form or accompanied with the prescribed fee.

Requests for access to records of the CGSA may be made to the relevant persons listed above.

9. PROCEDURE FOR PAIA REQUESTS

9.1. Any person may make a request for access to a record of the CGSA.

9.2. A request must be made in writing on the prescribed Form 02: Request for Access to Record which can be accessed by: https://inforegulator.org.za/paia-forms/

9.3. The request form must be addressed to the Information Officer using the contact details set out in clause 5 above.

9.4. The request must contain the name and contact details of the requester and it must provide sufficient details to enable CGSA to identify the record requested. The requester should also indicate the form in which access to the record is requested.

9.5. Where the request is made on behalf of another person, the requester must submit proof, in the form of an affidavit or letter of consent, of the capacity in which the requester is making the request to the satisfaction of the Information Officer.

10. PAYMENT OF FEES (S 22 of PAIA)

10.1. A request fee is payable for PAIA requests and proof of such payment must be sent to the Information Officer together with the request. Once CGSA has decided to grant the requested access to information, access fees may be imposed by the CGSA to the requester.

10.2. The request fee is aligned to the Regulations published in terms of the PAIA Act.

10.3. Bank deposit is the only accepted payment method for PAIA requests using the following CGSA's banking details, which will be made available on request.

10.4. A request is only received once a completed form and the prescribed request fee have been received by the Information Officer.

10.5. Upon receipt of the PAIA request, CGSA shall endeavor to consider and provide a response to each request within the prescribed thirty (30) days. When necessary, CGSA may extend the period of thirty (30) days for a further period of thirty (30) days to finalise request.

10.6 Please note that you can access the Fee Schedule on Form 03: Outcome of Request and of fees payable on: https://inforegulator.org.za/paia-forms/ .

11. DECISION OF CGSA

11.1. As prescribed in section 25 of the Act, the Information Officer shall decide whether to grant the requested access to information and inform the requester accordingly. The requester shall be notified of the decision in the most expedient manner possible.

11.2. If the request for access to information is refused by the Information Officer, the requester shall be provided with written reasons for such refusal.

12. RIGHT TO CHALLENGE DECISION

Where a request for access has been refused or not replied to, an internal appeal can be lodged with the Head at one of the contact details listed above in paragraph 4 and/or 5 above. An internal appeal can be lodged by way of a written letter addressed to the Head of our firm and completing the relevant prescribed form, being Form04: Internal Appeal Form which can be accessed on: https://inforegulator.org.za/paia-forms/ .

In the event that an internal appeal is unsuccessful for whatever reason, the applicant is entitled to exercise their remedies in terms of the PAIA, which include access to a Court of law. However, same can be appealed to the Information Regulator by completing Form 05: Complaint Form by accessing same on: https://inforegulator.org.za/paia-forms/ .

13. AVAILABILITY OF THE MANUAL

This manual has been drafted in an effort to show the CGSA's commitment to leading by example in the compliance with, our Constitution, laws and regulations of the Republic of South Africa. The availability of this manual is not only in compliance with the requirements of PAIA and POPIA but also is an effort to truly run a transparent institution which is compliant and promotes the constitutional right of access to information.

The manual is available in electronic and hard copies in English. The hard copies are also made available at CGSA's reception area, and in every division of CGSA for public inspection during business hours. The manual is also available on the website of CGSA and can be made available to any person upon request.

14. UPDATING OF THE MANUAL

This manual will be updated on an annual basis unless material amendments occur to warrant same.

15. PROCESSING AND PURPOSE OF PERSONAL INFORMATION IN TERMS OF THE PROTECTION OF PERSONAL INFORMATION ACT NO 4 OF 2013

CGSA must collect and use information, including personal information as defined in the Protection of Personal Information Act, to the extent that it is necessary to properly perform the functions, obligations and duties which can be accessed on our POPIA Policy.

Security Safeguards

CGSA will manage the security of its filing system to ensure that personal information is adequately protected. To this end, security controls will be implemented in order to minimise the risk of loss, unauthorised access, disclosure, interference, modification or destruction.

CGSA makes use of anti-virus software, firewalls, Anti-malware software, password protection and data encryption to safeguard online information.

CGSA will continuously review its security controls which will include regular testing of protocols and measures put in place to combat cyber-attacks on CGSA's IT network.

CGSA will ensure that all paper and electronic records comprising personal information are securely stored and made accessible only to authorised individuals.

CGSA's operators and third-party service providers will be required to enter into service level agreements with CGSA where both parties pledge their mutual commitment to POPIA and the lawful processing of any personal information pursuant to the agreement.

16 TRANSBORDER FLOWS OF PERSONAL INFORMATION

As part of CGSA data recovery policy we make use of off-site information storage in Singapore which is subject to the GDPR and will advise each data subject as and when applicable.

Issued by

04 November 2025

Wilna Ras **Date**

Information Officer duly appointed by the Head of CGSA