MVIA.

PAIA MANUAL

1. List of Acronyms and Abbreviations

- **"Guide"** means the Information Regulator's PAIA Guide as published on its website
- **"PAIA"** means Promotion of Access to Information Act No. 2 of 2000 (as amended)
- **"POPIA"** means Protection of Personal Information Act No. 4 of 2013
- **"Regulator"** means Information Regulator

2. Purpose of PAIA Manual

This PAIA Manual helps you (the public, our clients, and anyone else interested) understand what information we hold, how you can access it, and how we protect your personal information. It's useful for you to:

2.1 check the categories of records held by MVIA which are available without a person having to submit a formal PAIA request;
2.2 understand how to request access to our records, with a clear description of the subjects we keep records on and the types of records available under each subject;
2.3 understand which of our records are available under other laws;
2.4 access the contact details of our Information Officer and Deputy Information Officer(s) who can help you with the records you want to access;
2.5 learn about the Regulator's guide on how to use PAIA, how it is updated, and how you can get a copy;
2.6 see whether we process personal information, why we process it, and what categories of data subjects and information this involves;
2.7 know the categories of data subjects we hold information about and the types of information we keep for each category;
2.8 find out who we may share personal information with, or the categories of recipients it may be supplied to;
2.9 check whether we plan to transfer or process personal information outside the Republic of South Africa, and if so, who the recipients may be; and
2.10 check whether we have the appropriate security measures in place to protect the confidentiality, integrity and availability of the personal information we process.

3. Key Contact Details for Access to Information of MVIA

3.1 Information Officer

Information Officer	
Name:	Troy Oliver van der Westhuyzen
Tel:	087 2323 494
Email:	informationofficer@mvia.insure

3.2 Deputy Information Officers

Deputy Information Officers	
Name:	Susanna Elizabeth Snyman
Tel:	087 2323 494
Email:	santie.stevens@mvia.insure
Name:	Refilwe Motsoeneng
Tel:	087 2323 494
Email:	refilwe.motsoeneng@movingcapital.co.za

3.3 Access to Information General Contacts

Access to Information General Contacts	
Email:	paia@mvia.insure

MVIA (Pty) Ltd, an authorised financial service provider (FSP 45790) | 087 2323 494 | www.mvia.insure |
VAT no. 4010261909 Company Registration: 2012/201128/07 | Tokai Village Centre, Vans Rd, Cape Town, 7945

3.4 **Head Office**

Head Office	
Postal Address:	Suite 204, Tokai Village Centre Tokai, Western Cape 7945
Physical Address:	Suite 204, Tokai Village Centre Tokai, Western Cape 7945
Telephone:	087 2323 494
Email:	clientservices@mvia.insure
Website:	www.mvia.insure

4. Guide on How to Use PAIA and How to Obtain Access to the Guide

4.1 The Information Regulator has published a Guide in terms of section 10 of PAIA, that explains how PAIA and POPIA work and how to exercise your rights. The Guide is available in all official languages.

4.2 You can get a copy of the Guide:

4.2.1 on the Regulator's website at www.inforegulator.org.za;
4.2.2 by visiting the Regulator's offices during normal working hours; or
4.2.3 by asking our Deputy Information Officers for assistance.

5. Categories of Records of MVIA Which Are Available Without a Person Having to Request Access

In terms of section 52 of PAIA, certain information is already available to the public and does not require a formal PAIA request. These records are generally published on our website or available upon request from our offices. The following records are available without a PAIA request:

- Annual financial reports (where published)
- Product information, including brochures, fact sheets, and policy summaries.
- Advertising and marketing material, including pamphlets and promotional brochures.
- Newsletters and media statements.
- Memorandum of Incorporation (MOI).
- PAIA Manual and Privacy Policy
- Treating Customers Fairly (TCF) Policy
- Whistleblowing Policy

Where applicable, these records can be accessed via our website or requested directly from our Deputy Information Officers.

6. Description of the Records of MVIA Which Are Available in Accordance with Any Other Legislation

In addition to the records voluntarily disclosed above, MVIA holds certain records as required by law. Access to these records is governed by the applicable legislation and may not be automatically available.

Category of Records	Applicable Legislation
Memorandum of Incorporation Shareholder records Directors' details Audit records Banking records	Companies Act 71 of 2008
PAIA Manual	Promotion of Access to Information Act 2 of 2000
Information about customers: Name and surname, contact number, identity number, date of birth, phone number, age, address, country of residence, banking details, credit score, occupation Transactional details	Long Term Insurance Act 52 of 1998 Short-term Insurance Act 53 of 1998 National Credit Act 34 of 2005
FSP license Full and proper accounting and financial records Records of advice Conflict of Interest Management Policy Clients' identification details and documents Demographic records and details (i.e., age, income, gender and location) Records of premature cancellations of transactions or financial products by clients Records of complaints received together with an indication whether or not such complaints have been resolved Compliance reports Records of all funds received and payments made of all assets, liabilities and financial transactions	Financial Advisory and Intermediary Services Act 37 of 2002 (FAIS)

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Policy documents Client records Claims and underwriting records	Long Term Insurance Act 52 of 1998 Short-term Insurance Act 53 of 1998
Identity of prospective or existing client and occupation Ownership and Control Structure of the client or entity Information regarding the business relationship (nature and purpose of business) The source of income, funds, or wealth that the client expects to use during the business relationship The anticipated level and nature of the activity that is to be undertaken during the business relationship The nature and extent of the activity or business activity that the client may be involved in	Financial Intelligence Centre Act 38 of 2001 Prevention of Organised Crime Act 121 of 1998
Tax records VAT records PAYE records Employee income tax	Income Tax Act 58 of 1962 Value Added Tax Act 89 of 1991
Information about employees: Employee name and surname, contact number, identity number, passport number, phone number, age, address, banking details Family records (i.e., next of kin name and surname, contact number) Medical details Professional history (i.e., occupation, qualifications) Demographic details (i.e., age, income, gender, location) Financial records (i.e., salary, banking details, SARS-related information) Behavioural data (i.e., criminal checks, performance, disciplinary)	Basic Conditions of Employment Act 75 of 1997 Labour Relations Act 66 of 1995 Employment Equity Act 55 of 1998 Income Tax Act 58 of 1962

Address of the Employer, and its branches Names, identification numbers, monthly remuneration of employees and the address at which the employee is employed Employee identification details and documents Financial records (i.e., salary, banking details, SARS details) UIF contribution and benefits	Unemployment Insurance Act 63 of 2001
Record statistics and information regarding the occurrence and causes of accidents and occupational diseases Employee identification details and documents Employee's submissions regarding medical examination A register or other record of wages, time worked, payment for piece of work and overtime, and all other prescribed particulars Any document that is seen as evidence: e.g., sworn statements, etc.	Compensation for Occupational Injuries and Diseases Act 130 of 1993
B-BBEE certificate and transformation records (if applicable)	Broad-Based Black Economic Empowerment Act 53 of 2003

7. Description of the Subjects on Which the Body Holds Records and Categories of Records Held on Each Subject by MVIA

MVIA keeps records across various functions of our business. The table below describes the main subjects and the types of records we hold in each area:

Subjects on Which the Body Holds Records	**Categories of Records**
Corporate and Governance	Memorandum of Incorporation (MOI) Company registration documents Board and shareholder resolutions Compliance policies (e.g., Conflict of Interest, Complaints Management, Treating Customers Fairly, Whistleblowing) PAIA manual Privacy policy

Financial and Accounting	Annual financial statements Management accounts Tax records VAT records Audit reports Invoices Payment records Bank account records
Insurance Products and Services	Product brochures and policy wordings Application and onboarding forms Client proposals and quotations Policy schedules and endorsements Renewals Claims administration records (e.g., claim forms, supporting documentation, correspondence with clients and insurers) Client service records
FAIS and Regulatory Compliance	FSP license and certificates Compliance monitoring reports Complaints registers Records of advice Conflict of interest disclosures Key individual and representative registers
Client and Customer Records	Client onboarding and KYC records FICA documents Needs analysis Application forms Policy and claims correspondence Communications with clients
Human Resources (HR)	HR policies Employment contracts Leave records Payroll and remuneration records Performance appraisals Disciplinary records Employment equity records Recruitment records

Information Technology and Data Security	IT policies Access control records Data backup and recovery logs Incident reports Cybersecurity monitoring logs
Marketing and Communication	Marketing strategies Advertising material Newsletters Social media content Public relations and media releases
Service Providers and Suppliers	Supplier contracts Service level agreements Due diligence and onboarding documents Invoices and payment records
Legal and Contractual	Agreements with insurers (e.g., OMART) Broker agreements Third-party service provider agreements Legal opinions Litigation records
Transformation and B-BBEE	B-BBEE certificate Transformation plans Related correspondence

8. Processing of Personal Information

8.1 **Purpose of Processing Personal Information**

We process personal information only where it is necessary for our business and to comply with the law. The main purposes include:

a) Client onboarding and compliance

- To verify the identity of clients, service providers and employees.
- To comply with FAIS, FICA and other regulatory requirements.

b) Providing financial and insurance services

- To assess clients' needs and provide advice on suitable products
- To submit applications, process policy documents and administer cover.
- To assist with claims and other client service requests.

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c) Business operations and administration

- To manage our contracts with clients, insurers, service providers and employees.
- To keep proper financial, tax and audit records.
- To monitor and improve the quality of our services.

d) Human resources and employment

- To manage employment relationships, including recruitment, payroll, benefits and training.
- To meet our obligations under labour, tax, and employment equity laws.

e) Legal and regulatory obligations

- To meet our obligations under financial and insurance laws.
- To detect and prevent fraud, money laundering and other unlawful conduct.

f) Marketing and communication

- To send clients' information about our services, products and relevant updates (in line with direct marketing provisions under POPIA).
- Managing client preferences for communication.

8.2 **Categories of data subjects we hold information about and the types of information we keep**

We process personal information about the following categories of data subjects, and the typical types of information include:

Categories of Data Subjects	Personal Information that May be Processed
Clients and policyholders	Full name, contact details, identification number, demographic details, financial information, employment details, bank account details, FICA and KYC documents, policy and claim records
Prospective clients	Contact details, needs analyses, quotations, correspondence
Employees	Personal details (name, identification number, contact details, addresses), CVs and qualifications, employment contracts, payroll and tax records, leave and benefits records, performance and disciplinary records
Job applicants	CVs, qualifications, references, contact details

Service providers and suppliers	Company registration details, VAT and tax numbers, business contact details, service agreements, banking details
Regulators and industry bodies	Contact details of officials, correspondence, compliance submissions
Insurers and business partners	Contact details of representatives, contractual records, reporting information
Website users and marketing contacts	Names, contact details, communication preferences, online identifiers (e.g., IP addresses, cookies, where applicable)

8.3 **Category and type of personal information processed**

In the course of conducting our business, MVIA collects and processes various categories of personal information. The table below describes the main categories of personal information we may hold, and the types of information included in each category:

Personal Information Category	**Personal Information Type**
Personal details	Name, surname, date of birth
Unique identifiers	Identity number, passport number, client or employee numbers, registration numbers, tax numbers, policy numbers
Contact details	Physical address, postal address, email address, phone numbers
Demographic information	Age, gender, nationality, language
Financial information	Banking details, income details, tax records, payment history

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Employment information	Job title, employer, employment history, qualifications
Client relationship records	Policy and product information, application forms, quotations, claim records, correspondence
Online information	IP addresses, device identifiers, website usage data (cookies, where applicable)

8.4 **Category and type of special personal information processed**

We only process special personal information in limited circumstances, and only where POPIA permits it. This may include where we are required to do so by law, where we have the person's consent, or where it is necessary to exercise or defend a legal right.

The table below describes the categories of special personal information that MVIA may hold, and the types of information included in each category:

Special Personal Information Category	**Special Personal Information Type**
Physiological, physical or mental	Health information Sex life Sexual orientation
Biometric or genetic information	Biometric information or data Genetic information or data
Economic	Trade union membership
Cultural or social	Criminal behaviour Ethnic origin Political persuasion Opinions on race Religious or philosophical beliefs

8.5 **The recipients or categories of recipients to whom we share personal information**

We sometimes share the personal information we process with the individuals themselves and with other organisations. Where this is necessary, we are required to comply with all the requirements of POPIA.

The list below sets out the types of organisations we may share personal information with, where it is necessary or required to do so:

Personal Information Category	**Personal Information Type**
Family, associates and representative of the person whose personal information we are processing	Current, past and prospective employees
Employment and recruitment agencies	Educators and examining bodies
Financial organisations	Claims investigators
Credit bureaus and verification agencies	Suppliers and service providers
Healthcare, social and welfare organisations	Private investigators, where necessary
Healthcare professionals	Industry bodies
Law enforcement and courts, where necessary	Ombudsman and regulatory authorities
Operators	Survey and research organisations
Business associates and other professional advisers	Debt collection and tracing agencies
Claimants, beneficiaries, assignees, payees	Other companies in the Moving Capital Group
Press and the media	Auditors
Persons making an enquiry or complaint	Trade unions
Pension fund administrators	Security organisations

8.6 **Planned transborder flows of personal information**

From time to time, we may share personal information of data subjects with third parties in other countries. We are required to ensure that when we need to do this, we comply with the relevant provisions of POPIA.

We will only transfer personal information to a third party in another country if one of the following conditions is met:

a) The recipient is bound by a law, binding corporate rules, or a binding agreement that provides adequate protection of the information. This protection must:
    i. be substantially similar to the conditions for lawful processing of personal information under POPIA, relating to a data subject who is a natural person and, where applicable, a juristic person; and
    ii. include provisions that are substantially similar to this section, relating to the further transfer of personal information from the recipient to third parties who are in a foreign country;
b) the data subject consents to the transfer;
c) the transfer is necessary for the performance of a contract between the data subject and the company in question, or for the implementation of pre-contractual measures taken in response to the data subject's request;
d) the transfer is necessary for the conclusion or performance of a contract concluded in the interest of the data subject between the company in question and a third party; or
e) the transfer is for the benefit of the data subject, and:
    i. it is not reasonably practicable to obtain the consent of the data subject to that transfer; and
    ii. if it were reasonably practicable to obtain such consent, the data subject would be likely to give it.

8.7 **General description of Information Security measures to be implemented by MVIA to ensure the confidentiality, integrity and availability of the information**

At MVIA, we treat information as one of our most valuable assets. Protecting the confidentiality, integrity and availability of personal information is central to how we operate. We use layered safeguards to protect against unauthorised access, loss or damage to information. These include:

a) encrypting sensitive data;
b) restricting access to authorised users with strong passwords and multi-factor authentication;
c) protecting devices with security software and regular updates; and
d) securing our networks with firewalls and monitoring tools that meet industry standards.

Critical data is backed up daily and regularly tested to ensure it can be restored. We also carry out vulnerability testing to identify and fix potential risks, and we train our employees to handle information responsibly. We continually review and improve these measures to respond to evolving threats and regulatory requirements.

For more detail about how we handle personal information, please see our **Privacy Policy** on our website or ask any of our Deputy Information Officers for a copy.

9. How to Request Access to Records

9.1 We have appointed our Deputy Information Officers to handle all requests on behalf of our Information Officer so that we can comply with our PAIA obligations. To request access to a record, you need to complete Form 2 (the prescribed request form under PAIA).

9.2 You can submit the completed form, together with the request fee explained below, to any of our Deputy Information Officers at the email address or physical address provided in this Manual.

9.3 Please make sure that your request form:

- 9.3.1 contains enough detail for us to identify you, the record you want, and how you would like to access it;
- 9.3.2 includes your email address or postal address;
- 9.3.3 describes the right you want to exercise or protect;
- 9.3.4 explains why the record is needed to exercise or protect that right;
- 9.3.5 states how you prefer us to inform you of our decision (if different from writing); and
- 9.3.6 includes proof of your authority if you are making the request on behalf of someone else (we will assess whether this proof is sufficient).

9.4 If you do not use the prescribed Form 2, we may:

- 9.4.1 reject your request for not complying with this procedure;
- 9.4.2 refuse it if you do not give us enough information; or
- 9.4.3 take longer to process it.
- 9.4.4 We will consider every request we receive. If your request is approved, we will provide access in the most appropriate way, unless you have asked for a specific form of access. Please note that publishing this Manual does not, on its own, create a right to access information. Access only granted in terms of PAIA.

10. Request and Access Fees

10.1 **Request fees**

10.1.1 When you submit a request, the law requires you to pay a request fee. We will not begin processing your request until this fee has been paid. Our Deputy Information Officer will send you a notice (in terms of section 54(1)) confirming the fee and the procedure to follow (as required by section 54(3)(c)).

10.2 **Access fees**

10.2.1 If you request is granted, you will also need to pay an access fee before we release the record. This fee covers the time and costs involved in finding, preparing and providing the record to you. If the search and preparation time is expected to exceed the prescribed hours, our Deputy Information Officer may require you to pay a deposit of up to one-third of the access fee (section 54(2)).

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10.2.2 The access fee may include:

- the cost of making or transcribing the record;
- postage or courier charges (if applicable); and
- the reasonable time we need to search for and prepare the record.

10.2.3 If you have paid a deposit and your request is later refused, we will refund the deposit. We may withhold the record until all fees have been paid in full.

11. Grounds for Refusal to Access a Record

11.1 **Refusal of access**

PAIA allows us to refuse access to certain records in order to protect important rights and interests. We may have to refuse your request if giving access would:

- infringe someone else's privacy (section 63);
- reveal another company's commercial information (section 64);
- disclose someone else's confidential information (section 65);
- endanger the safety of individuals or property (section 66);
- disclose records privileged in legal proceedings (section 67); or
- reveal research information (section 68).

11.2 **Our decision on your request**

We will inform you in writing within 30 calendar days whether your request has been approved or refused. If the record you requested does not exist or cannot be found, we will give you an affidavit confirming that it is not possible to provide access to that record.

11.3 **Remedies available for refusal of access to records**

If we deny your request for access, you may:

- apply to a court with appropriate jurisdiction (section 78); or
- complain to the Information Regulator, for the necessary relief within 180 calendar days of us notifying you of our decision.

12. Availability of the Manual

A copy of this Manual is available:

- on our website;
- at the head office of MVIA for public inspection during normal business hours;
- on the Information Regulator portal under our business name.

13. Updating of the Manual

The Information Officer will update this manual on a regular basis.

ANNEXURE A **FORM 2**

REQUEST FOR ACCESS TO RECORD (PAIA REGULATION 7)

NOTE:

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

TO: The Information Officer
Address: Suite 204 Tokai Village Center
2 Vans Road
Tokai
Western Cape
7945

Email: paia@mvia.insure cc informationofficer@mvia.insure

Mark with an 'X':

☐ Request is made in my own name

☐ Request is made on behalf of another person

PERSONAL INFORMATION

Requester	
Full Names	
Identity Number	
Capacity in which request is made (if made on behalf of another person)	

Postal Address		
Street Address		
Email Address		
Contact Number	Landline	
	Cellular	

DATA SUBJECT (if different to Requester)

Full Names		
Identity Number		
Postal Address		
Email Address		
Contact Number	Landline	
	Cellular	

PARTICULARS OF RECORDS REQUESTED

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

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

TYPE OF RECORD – Mark the applicable box with an "X"

Record is in written or printed form	
Record compromises virtual images (this includes photographs, slides, videos, recordings, computer-generated images, sketches, etc.)	
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 – Mark the applicable box with an "X"

Printed copy of the 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 (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 the record at the registered address of MVIA (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)	
Preferred language (note 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 requestor 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) A request fee must be paid before the request will be considered
b) You will be notified of the amount of the access fee to be paid
c) 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
d) If you qualify for exemption of the payment of any fee, please state the reason for exemption

Reason	

CORRESPONDENCE PREFERENCE

You will be notified in writing whether your request has been approved or denied, and if approved, what fees are payable, if any. Please indicate your preferred manner of correspondence (mark with an "X").

☐ Post ☐ Email

POSTAL ADDRESS	EMAIL ADDRESS

SIGNED AT _____ **ON THIS** _____ **DAY OF 20** _____

_____

Signature of requestor/person on whose behalf request is made