

MANUAL
As required in terms of Section 51 of the PROMOTION OF ACCESS TO
INFORMATION ACT
No. 2 of 2000 (“PAIA”)
and
The Protection of Personal Information Act, 4 of 2013 (“POPIA”)

This manual contains information required to request access to records held by Old Mutual Limited and its South African subsidiaries (“Old Mutual”).

THE INFORMATION REGULATOR GUIDE:

The Information Regulator guide contains such information as may reasonably be required by any person who wishes to exercise any right contemplated in the Act. The Information Regulator can be contacted at the following address:

Email	enquiries@inforegulator.org.za
Website	http://www.justice.gov.za/inforeg/index.html

PROCEDURE TO BE FOLLOWED TO REQUEST ACCESS TO RECORDS:

1. Requestors are to complete the prescribed FORM C as contained in the Regulations to PAIA.
2. The completed FORM C may be **posted or emailed** to the Information Officer Old Mutual at the following addresses:

Email address	PAIA@oldmutual.com
Postal address	Old Mutual PO BOX 66 Cape Town 8000
Street address	Old Mutual Mutualpark Jan Smuts Drive Pinelands 7405
Phone number	+27 (0)21 509 9111

3. The Information Officer will process the request and inform the requestor of the fees, (if any) that he/she has to pay and of the further steps that will follow in the processing of the request.

Note: Access to certain records may be denied on the grounds set out in the Promotion of Access to Information Act, No 2 of 2000.

Categories of records held	
Long-term insurance products	Administration of Retirement Annuities and Pension Funds
Savings products	Trust services
Unit trust products	Money transfer services
Investment and risk products to groups and schemes	Actuarial and consulting services to the group retirement industry
Short-term Insurance products	Health Care products
Linked Investment services	Lending Products
Managed care services to the healthcare industry	Administration of medical schemes
Company Records	
Finance and supporting documentation	Distribution
Actuarial	Marketing
Client care	Information Technology
Product management	Human Resources
All records kept in terms of the Company Laws of South Africa	

Subjects on which records are held		
Advisor	Employer	Offender / Suspected Offender
Banking Institutions	Event Delegate	Official
Beneficiary	External Juristic	OML Employee
Board Member	Home Buyer / Tenant	Policyholder
Candidate	Independent Broker	Premium Payer
CGIC Buyer	Independent Contractor	Prospect
Child	Individual Acting On Behalf Of	Referee
Complainant / Enquirer	Individual Captured by CCTV Images	Rewards Member
Consultant	Interested Individual	Shareholder
Contracting Party	Intermediary	Social Responsibility Recipient
Co-Signatory	Investor	Subsidiary Company
Customer	Life Covered	Vendor
Director	Member	Witness
Donor	Next of Kin	

The following records are held in respect of the abovementioned data subjects	
Confidential	Scientific
Personal	Research
Commercial	Operational
Financial	Trade
Group / company incorporation	Business
Group / company financial	Internal group / company divisions
Group / company departments	Group / company structure
Strategy	Policyholder
Contractor	Shareholder
Investor	External companies
Subsidiary companies	Broker
Adviser	Directors
Consultant	Employee
Information Technology	Banking institutions
Client	Official / legal
Product and services	Policy documents
Contracts	
Rules of Funds	

Records are held in terms of the following legislation	
Long-term Insurance Act, 52 of 1998	Employment Equity Act, 55 of 1998
Pension Funds Act, 24 of 1956	Prevention of Organised Crime Act, 121 of 1998
Medical Schemes Act, 131 of 1998	Financial Intelligence Centre Act, 38 of 2001
Collective Investment Schemes Control Act, 45 of 2002	Security Services Act, 36 of 2004
Inspection of Financial Institutions Act, 80 of 1998	Income Tax Act, 58 of 1962
Labour Relations Act, 66 of 1995	Value-Added Tax Act, 58 of 1962
Tax on Retirement Funds Act, 38 of 1996	Short-term Insurance Act, 53 of 1998
Basic Conditions of Employment Act, 75 of 1997	Unemployment Insurance Act, 30 of 1966
Financial Sector Regulation Act, 9 of 2017	Financial Advisory and Intermediary Services Act, 37 of 2002
Companies Act, 61 of 1973	National Credit Act, 34 of 2005
Insurance Act, 18 of 2017	

Purpose of the processing	
Application for Employment	Legal Proceedings
Claim Checks	Market Research & Statistical Analysis
Claims Management	Marketing
Compliance Assessment	Operations
Compliance with Legislation	PI Maintenance
Credit Reference Checking	Provision of Products & Services
Debt Tracing & Recovery	Record Keeping
Employment Management & Administration	Social Responsibility
Fraud, Crime & Money Laundering Detection	Underwriting
Identify Verification	

Categories of Data Subjects	
Shareholders	Clients
Board Members, Directors	Banking institutions
Employees	External companies / contractors
Officials	Suppliers and service providers
Consultants	Policyholders
Offenders and suspected offenders	Pension Fund members and beneficiaries
Investors	Individuals captured by CCTV images
Complainants, enquirers	Individuals who have indicated interest in our products and/or services
Employers and employees of other organisations	Prospective employees, candidates
Witnesses	Co-Signatories and Individuals Acting on Behalf Of
Subsidiary companies	Next of Kin
Advisors	Buyers
Independent brokers	Children
Lives Covered	Prospective Employee Referees
Donors	Rewards Members
Home Buyers and Tenants	Social Responsibility Recipients
Premium Payers	

Category and Type of Personal Information (PI) Processed	
PI Category	PI Type
Identifier	Name Address Information / Details Contact Number Email Address Identifying Number Location Information/Data Online identifier Other Particular Assignment to DS Symbol
Physiological / Physical / Mental	Age Date of Birth Gender Pregnancy Status
Economic	Education Information Employment Information Financial Information
Cultural / Social	Colour Correspondence Sent Culture Language Marital Status National Origin Personal Opinions, Views or Preferences of the DS Social Origin Views/opinions of another individual about the DS

Category and Type of Special Personal Information (SPI) Processed	
PI Category	PI Type
Physiological / Physical / Mental	Health Information Sex Life Sexual Orientation
Biometric / Genetic Information	Biometric Information / Data Genetic Information / Data
Economic	Trade Union Membership
Cultural / Social	Criminal Information Ethnic Origin Political Persuasion / Opinions Race Religious or Philosophical Beliefs

Who the information may be shared with

We sometimes wish to share the personal information we process with the individual themselves and also with other organisations. Where this is necessary we are required to comply with all aspects of the Protection of Personal Information Act. What follows is a description of the types of organisations we may choose to share some of the personal information we process with for one or more reasons.

Where necessary or required we share information with:

Family, associates and representatives of the person whose personal information we are processing	Current, past and prospective employers
Employment and recruitment agencies	Educators and examining bodies
Financial organisations	Claims investigators
Credit reference agencies	Suppliers and service providers
Healthcare, social and welfare organisations	
Healthcare professionals	Industry bodies
Central government	Ombudsman and regulatory authorities
Police forces and courts, where necessary	Survey and research organizations
Operators	Debt collection and tracing agencies
Business associates and other professional advisers	Other companies in the Old Mutual Group
Professional advisors and consultants	Auditors
Claimants, beneficiaries, assignees and payees	Pension fund administrators
Press and the media	Trade unions
Persons making an enquiry or complaint	Security organizations
Private investigators	

Transborder flows of personal information

From time to time we may wish to 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 POPIA.

Such sharing will only be done if one of the following requirements are met:

(a) the third party who is the recipient of the information is subject to a law, binding corporate rules or binding agreement which provide an adequate level of protection that—

(i) effectively upholds principles for reasonable processing of the information that are substantially similar to the conditions for the lawful processing of personal information relating to a data subject who is a natural person and, where applicable, a juristic person, as set out in the Protection of Personal Information Act; and

(ii) includes 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.

Information Security

Information is one of our most valuable assets. Safeguarding and preserving the confidentiality, integrity, and availability of our customer and employee information is imperative to our operations and treated as critical to our business strategy.

As a responsible business and as threats evolve, we are investing to continuously improve our information security posture. We are committed to embed an information security culture throughout our organization and are continually working towards improving the security of our environment and information by:

- Making sure information security controls are adequately implemented

and applying monitoring of the control environment.

- Making sure that information is protected with appropriate access, disclosure, disruption, modification, or destruction.
- Making sure access is restricted based on function with permission granted and modified based on changes in function with access revoked on termination of employment.

To view our Customer Privacy Notice, please visit www.oldmutual.co.za or click [here](#).^[AS1]

If you want to complaint to the Information Regulator, you can do so at PAIAComplaints@inforegulator.org.za

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