



OLDMUTUAL

# PAIA MANUAL

Prepared in terms of section 51 of the Promotion of Access to Information Act of 2000 (as amended) (PAIA) and The Protection of Personal Information Act, 4 of 2013 (POPIA)

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DO GREAT THINGS EVERY DAY

# CONTENTS

1. Purpose of PAIA manual	2
2. Key contact details for access to information of Old Mutual	2
2.1. Information Officer	4
2.2 Access to information general contacts	2
2.3 National or Head Office	2
3. Guide on how to use PAIA and how to obtain access to the regulator's guide	3
4. Categories of records of Old Mutual which are available without a person having to request access	4
5. Description of the records of Old Mutual which are available in accordance with any other legislation	4
6. Description of the subjects on which the body holds records and categories of records held on each subject by Old Mutual	7
7. Processing of personal information	8
7.1 Purpose of processing personal information	8
7.2 Description of the categories of data subjects and of the information or categories of information relating thereto	9
7.3 The recipients or categories of recipients to whom the personal information may be supplied	10
7.4 Planned transborder flows of personal information	11
7.5 General description of information security measures to be implemented by Old Mutual to ensure the confidentiality, integrity and availability of the information	11
8. Availability of the manual	11
9. How to request access to records	12
10. Manual updates	12



## 1. PURPOSE OF PAIA MANUAL

This manual contains information required to request access to records held by Old Mutual Limited and its South African subsidiaries (Old Mutual). This PAIA Manual is useful for the public to:

- 1.1. check the categories of records held by Old Mutual which are available without a person having to submit a formal PAIA request;
- 1.2. have a sufficient understanding of how to make a request for access to a record of Old Mutual, by providing a description of the subjects on which Old Mutual holds records and the categories of records held on each subject;
- 1.3. know the description of the records of Old Mutual which are available in accordance with any other legislation;
- 1.4. access all the relevant contact details of the Information Officer who will assist the public with the records they intend to access;
- 1.5. know the description of the guide on how to use PAIA, as updated by the Regulator and how to obtain access to it;
- 1.6. know if Old Mutual will process personal information, the purpose of processing of personal information and the description of the categories of data subjects and of the information or categories of information relating thereto;
- 1.7. know the description of the categories of data subjects and of the information or categories of information relating thereto;
- 1.8. know the recipients or categories of recipients to whom the personal information may be supplied;
- 1.9. know if Old Mutual 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
- 1.10. know whether Old Mutual has appropriate security measures to ensure the confidentiality, integrity and availability of the personal information which is to be processed.



## 2. KEY CONTACT DETAILS FOR ACCESS TO INFORMATION OF OLD MUTUAL

### 2.1. Information Officer

Name: Old Mutual Chief Privacy Officer  
Email: [paia@oldmutual.com](mailto:paia@oldmutual.com)

### 2.2 Access to information general contacts

Email: [paia@oldmutual.com](mailto:paia@oldmutual.com)

### 2.3 National or Head Office Postal Address:

Old Mutual  
PO BOX 66  
Cape Town  
8000

#### Physical Address:

Old Mutual  
Mutualpark  
Jan Smuts Drive  
Pinelands  
7405

Email: [paia@oldmutual.com](mailto:paia@oldmutual.com)

Website: [www.oldmutual.co.za](http://www.oldmutual.co.za)



### 3. GUIDE ON HOW TO USE PAIA AND HOW TO OBTAIN ACCESS TO THE REGULATOR'S GUIDE

- 3.1. The Regulator has, in terms of section 10(1) of PAIA, as amended, updated and made available the revised Guide on how to use PAIA (Guide), in an easily comprehensible form and manner, as may reasonably be required by a person who wishes to exercise any right contemplated in PAIA and POPIA.
- 3.2. The Guide is available in English, Sesotho and Afrikaans.
- 3.3. The aforesaid Guide contains the description of:
  - 3.3.1. the objects of PAIA and POPIA;
  - 3.3.2. the postal and street address, phone and fax number and, if available, email address of:
    - 3.3.2.1. the Information Officer of every public body, and
    - 3.3.2.2. every Deputy Information Officer of every public and private body designated in terms of section 17(1) of PAIA and section 56 of POPIA;
  - 3.3.3. the manner and form of a request for:
    - 3.3.3.1. access to a record of a public body contemplated in section 11; and
    - 3.3.3.2. access to a record of a private body contemplated in section 50;
  - 3.3.4. the assistance available from the Information Officer of a public body in terms of PAIA and POPIA;
  - 3.3.5. the assistance available from the Regulator in terms of PAIA and POPIA;
  - 3.3.6. 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:
    - 3.3.6.1. an internal appeal;
    - 3.3.6.2. a complaint to the Regulator; and
    - 3.3.6.3. 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;
  - 3.3.7. 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;
  - 3.3.8. the provisions of sections 15 and 52 providing for the voluntary disclosure of categories of records by a public body and private body, respectively;
  - 3.3.9. the notices issued in terms of sections 22 and 54 regarding fees to be paid in relation to requests for access; and
  - 3.3.10. the regulations made in terms of section 92.
- 3.4. 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.
- 3.5. The Guide can also be obtained:
  - 3.5.1. upon request to the Information Officer;
  - 3.5.2. from the website of the Regulator ([www.justice.gov.za/inforeg/](http://www.justice.gov.za/inforeg/)).
- 3.6. A copy of the Guide is available in English, Sesotho and Afrikaans for public inspection during normal office hours.



## 4. CATEGORIES OF RECORDS OF OLD MUTUAL WHICH ARE AVAILABLE WITHOUT A PERSON HAVING TO REQUEST ACCESS

In terms of Section 52 of PAIA, the following categories of Old Mutual records are available without a person having to request access:

1. Annual financial reports
2. Interim audited report
3. Product information
4. Advertising pamphlets and brochures
5. Newsletters
6. Memorandum of Incorporation (MOI)



## 5. DESCRIPTION OF THE RECORDS OF OLD MUTUAL WHICH ARE AVAILABLE IN ACCORDANCE WITH ANY OTHER LEGISLATION

CATEGORY OF RECORDS	APPLICABLE LEGISLATION
Memorandum of incorporation Shareholder Records Secretarial Records Audit Records Banking Records Directors Details	Companies Act 71 of 2008
PAIA Manual	Promotion of Access to Information Act 2 of 2000
<b>The following information about customers:</b> 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
<b>The following information about retirement fund members:</b> Name and surname, contact number, identity number, phone number, age, address, banking details Contribution records Member Benefit Statements Tax applications, directives and certificates (where applicable) Member choice forms Member claim forms Beneficiary nomination details Information furnished to the Fund at claim stage to execute the duties in terms of section 37C of the Pension Funds Act	Pension Funds Act 24 of 1956

<p><b>The following details about members/ investors:</b></p> <p>Name and surname, contact number, identity number, passport number, phone number, age, address, banking details</p> <p>Transactional details</p> <p>Financial statements</p> <p>Association license</p> <p>Employment history</p> <p>Proposed resolution by investors</p> <p>Certificate of registration of conversion</p>	<p>Collective Investments Schemes Control act 45 of 2002</p>
<p><b>The following information about Employees:</b></p> <p>Employee name and surname, contact number, identity number, passport number, phone number, age, address, banking details)</p> <p>Family Records (i.e. next of kin name and surname, contact number)</p> <p>Medical Details</p> <p>Professional History (Occupation, Qualifications)</p> <p>Demographic details (Age, Income, Gender, Location)</p> <p>Financial Records (Salary, Banking Details, SARS related information)</p> <p>Behavioural data (Criminal checks, performance, disciplinary)</p>	<p>Employment Equity Act 55 of 1998</p> <p>Basic Conditions of Employment Act 75 of 1997</p> <p>Labour Relations Act 66 of 1995</p> <p>Income Tax Act, 58 of 1962</p>
<p>Identity of prospective or existing client and occupation</p> <p>Ownership and Control Structure of the Client/Entity</p> <p>Information regarding the business relationship (nature and purpose of business)</p> <p>The source of income/ funds/wealth that the client expects to use during the business relationship</p> <p>The anticipated level and nature of the activity that is to be undertaken during the business relationship</p> <p>The nature and extent of the activity/business activity that the client may be involved in</p>	<p>Financial Intelligence Centre Act 38 of 2001</p> <p>Prevention of Organised Crime Act, 121 of 1998</p>
<p>Record statistics and information regarding the occurrence and causes of accidents and occupational diseases</p> <p>Employee identification details and documents</p> <p>Employee to submit to medical examination</p> <p>A register or other record of wages, time worked, payment for piece work and overtime and all other prescribed particulars</p> <p>Any document that is seen as evidence: e.g., sworn statement, etc.</p>	<p>Compensation for Occupational Injuries and Diseases Act 130 of 1993</p>

<p>Clients' identification details and document</p> <p>Demographic records Demographic details (Age, Income, Gender, Location)</p> <p>Financial records</p> <p>Records of premature cancellations of transactions or financial products by clients</p> <p>Records of complaints received together with an indication whether or not any such complaints have been resolved</p> <p>Full and proper accounting records</p> <p>Records of all funds received and payments made and of all assets, liabilities and financial transactions</p>	<p>Financial Advisory and Intermediary Services Act 37 of 2002</p>
<p>Address of the Employer, and its branches</p> <p>Names, identification numbers and monthly remuneration of employees and the address at which the employee is employed</p> <p>Employee Identification details and documents</p> <p>Financial Records (Salary, Banking Details, SARS details)</p> <p>Amount of benefits for purposes of section 13(3)</p> <p>Benefits the applicant is entitled to</p>	<p>Unemployment Insurance Act 63 of 2001</p>





## 6. DESCRIPTION OF THE SUBJECTS ON WHICH OLD MUTUAL HOLDS RECORDS AND CATEGORIES OF RECORDS HELD ON EACH SUBJECT

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	Old Mutual 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



## 7. PROCESSING OF PERSONAL INFORMATION

### 7.1 Purpose of Processing Personal Information

PURPOSE OF THE PROCESSING	
Application for Employment	Legal Proceedings
Claim Checks	Market Research and Statistical Analysis
Claims Management	Marketing
Compliance Assessment	Operations
Compliance with Legislation	Personal Information Maintenance
Credit Reference Checking	Provision of Products and Services
Debt Tracing and Recovery	Record Keeping
Employment Management and Administration	Social Responsibility
Fraud, Crime and Money Laundering Detection	Underwriting
Identify Verification	

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

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
Advisers	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 PROCESSED	
Personal Information Category	Personal Information Type
Identifier	Name Address Information/Details Contact Number Email Address Identifying Number Location Information/Data Online identifier Other Particular Assignment to Data Subject 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 Data Subject Social Origin Views/opinions of another individual about the Data Subject

CATEGORY AND TYPE OF SPECIAL PERSONAL INFORMATION PROCESSED	
Personal Information Category	Personal Information 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

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

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 POPIA.

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	Private investigators
Healthcare professionals	Industry bodies
Central government	Ombudsman and regulatory authorities
Police forces and courts, where necessary	Survey and research organisations
Operators	Debt collection and tracing agencies
Business associates and other professional advisers	Other companies in the Old Mutual Group
Professional advisers and consultants	Auditors
Claimants, beneficiaries, assignees and payees	Pension fund administrators
Press and the media	Trade unions
Persons making an enquiry or complaint	Security organisations

## 7.4 Planned 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.

## 7.5 General description of Information Security Measures to be implemented by Old Mutual to ensure the confidentiality, integrity and availability of the information

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.



## 8. AVAILABILITY OF THE MANUAL

**8.1** A copy of the Manual is available:

- 8.1.1 on [www.oldmutual.co.za](http://www.oldmutual.co.za)
- 8.1.2 at the head office of Old Mutual for public inspection during normal business hours;
- 8.1.3 to any person upon request and upon the payment of a reasonable prescribed fee; and
- 8.1.4 to the Information Regulator upon request.

**8.2** A fee for a copy of the Manual, as contemplated in Annexure B of the PAIA Regulations, shall be payable per each A4-size photocopy made.



## 9. HOW TO REQUEST ACCESS TO RECORDS

1. Requestors are to complete the prescribed Form C. See Annexure A for Form C.
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

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 PAIA.



## 10. MANUAL UPDATES

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

Issued by the Old Mutual Chief Privacy Officer

Version 6, August 2023

## 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:** Mutualpark  
Jan Smuts Drive  
Pinelands  
7405  
South Africa

**E-mail:** PAIA@oldmutual.comww

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		
Street 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 comprises 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 Old Mutual (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 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	
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**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 \_\_\_\_\_ this \_\_\_\_\_ day of 20\_\_\_\_\_

\_\_\_\_\_  
Signature of requestor / person on whose behalf request is made

