

PAIA MANUAL

for:

ARCO360 (PTY) LTD.

Prepared in terms of section 51 of the Promotion of Access to
Information Act 2 of 2000 (as amended)

Revision: 24 June 2024

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1 DEFINITIONS

<i>Acronym</i>	<i>Definition</i>
<i>ARCO360</i>	ARCO360 (PTY) Ltd.
<i>MD</i>	Managing Director
<i>DIO</i>	Deputy Information Officer
<i>IO</i>	Information Officer
<i>Minister</i>	Minister of Justice and Correctional Services;
<i>PAIA</i>	Promotion of Access to Information Act No. 2 of 2000 as amended.
<i>POPIA</i>	Protection of Personal Information Act No.4 of 2013.
<i>Regulator</i>	Information Regulator
<i>Republic</i>	Republic of South Africa

2 PURPOSE OF THIS PAIA MANUAL

This PAIA Manual serves as a guide for the public and our clients on how to access information held by ARCO360 in accordance with PAIA. It outlines the procedures, fees, and grounds for refusal related to information requests. Additionally, it provides information on how we manage and protect personal information in compliance with POPIA.

This Promotion of Access to Information Manual ("PAIA Manual") provides an outline of the type of records and personal information that ARCO360 holds and explains how to submit requests to ARCO360 for access to these records in terms of the Promotion of Access to Information Act 2 of 2000 ("PAIA Act"). It also explains how to object to, or to correct personal information held by ARCO360, in terms of paragraphs 23 and 24 of the Protection of Personal Information Act 4 of 2013 ("POPI Act").

Section 51(1) of the Act provides that within six months after the commencement of this section, the head of a private body must compile a manual that must contain information regarding the subjects and categories of records held by such private bodies. In this context, a "private body" is defined as any natural person who carries or has carried on any trade, business or profession, but only in such capacity or any partnership, which carries or has carried on any trade, business or profession or any former or existing juristic person (e.g., any company, close corporation or business trust). ARCO360 falls within the definition of a "private body" and this Manual has been compiled in accordance with the said provisions and to fulfil the requirements of the Act.

In terms of the Act, where a request for information is made to a body, there is an obligation to provide the information, except where the Act expressly provides that the information may not be released. In this context, Section 9 of the Act recognises that access to information can be limited. The limitation relates to circumstances where such release would pose a threat to the protection of privacy, commercial confidentiality, and the exercising of efficient governance. Accordingly, this manual provides a reference to

the records held by ARCO360 and the process that needs to be adopted to access such records.

If you are accessing this Manual on our website, you can also get a copy from our Information Officer by writing to the address in section 4 or emailing the Information Officer directly.

All requests for access to information (other than information that is available to the public) must be addressed to the Head of the Business named in section 4 of this Manual.

3 ABOUT ARCO360

ARCO360 (Pty) Ltd is an equine and pet insurance brokerage dedicated to providing specialised cover for horses, cats and dogs. Our products have been developed to encompass all the risks that you may potentially encounter.

ARCO360 is committed to transparency, accountability, and the responsible management of information. As part of our commitment to good governance, we comply with the Promotion of Access to Information Act (PAIA) and the Protection of Personal Information Act (POPIA).

4 BUSINESS AND CONTACT DETAILS

Name of Business:	ARCO360 (Pty) Ltd
Head of Business / Information Protection Officer:	Genevieve McNeill
Physical Address:	62 Kirtlington Park, 56 Inanda Road, Hillcrest, KwaZulu-Natal, 3626
Phone Number:	+27 82 896 4501
Email Address:	gen@arco360.co.za
Website:	www.arco360.co.za

5 PAIA RESOURCES AND ACCESS TO THIS GUIDE

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.

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

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

The Guide can also be obtained:

- upon request to the Information Officer,
- from the website of the Regulator ()

The Information Regulator (South Africa)

Postal Address: PO Box 31533, Braamfontein, 2017

Street Address: 27 Stiemens St, Braamfontein, 2001

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

POPIA complaints: POPIAComplaints@inforegulator.org.za

PAIA complaints: PAIAComplaints@inforegulator.org.za

6 THE ASSISTANCE AVAILABLE FROM THE REGULATOR IN TERMS OF PAIA AND POPIA.

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:

- an internal appeal.
- a complaint to the Regulator.
- and 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; the provisions of sections 5 and 516 requiring a public body and private body, respectively, to compile a manual, and how to obtain access to a manual.
- the provisions of sections 157 and 528 providing for the voluntary disclosure of categories of records by a public body and private body, respectively.
- the notices issued in terms of sections 229 and 5410 regarding fees to be paid in relation to requests for access; and
- the regulations made in terms of section 9211.

7 THE PROMOTION OF ACCESS TO INFORMATION ACT (PAIA)

PAIA is South Africa's legislation that promotes transparency and access to information held by public and private bodies. Its primary objectives are to foster a culture of openness, accountability and democracy by granting individuals and entities the right to access information.

PAIA grants individuals and entities the right to request access to records held by private and public bodies. These records can include documents, reports, data, and other forms of information. ARCO360 is committed to complying with PAIA and providing access to information in a responsible and transparent manner.

8 ARCO360 RECORDS OF PROCESSING PER SECTION 51 (1) (E)

Department	Data Subject Type	Processing Purpose	Personal Information Category
Finance	Employees	Shareholder Agreements	Name and Surname, ID Numbers, Physical and Postal Address, Signatures, PAYE Numbers, Vat Numbers
Finance	Employees	FSB Documents Lawful basis: S11 - To conclude or perform a contract to which the data subject is party Retention Period: Until tax or other legal retention period expires	Name and Surname, ID Numbers, Physical and Postal Address, Signatures, PAYE Numbers, Vat Numbers
Human Resources	Employees	Personnel Records S11 - To conclude or perform a contract to which the data subject is party Retention Period: Until tax or other legal retention period expires	Name, Surname, Contact details, Physical and postal address, Education History, Employment History, Banking Details, Reference Contact details, Medical Certificates/ Health Status, Remuneration Details, PAYE Number, ID Number, Banking Details, Certificates/ Diplomas/ Degrees, Confidential Correspondence
Client Records	Clients	Application Forms S11 - To conclude or perform a contract to which the data subject is party Retention Period: Until tax or other legal retention period expires	Name, Surname, Address, Contact Numbers, VAT number, ID or Passport Number, Company Registration Number, Pet Microchip Number, Banking Details, Signature

Service Provider Records	Service Providers	Third Party Contracts S11 - To conclude or perform a contract to which the data subject is party Retention Period: Until tax or other legal retention period expires	Company name, registration number, contact details, ID number, physical address, VAT number
Marketing	Clients / Potential Clients	Database for Ad Hoc Emails S11- We have the data subjects consent Retention Period: Until consent withdrawn	Names and Surnames, Email Addresses
Marketing	Clients / Potential Clients	Website - Online Application Form S11- We have the data subjects consent Retention Period: Until consent withdrawn	Name, Surname, Address, Contact details, VAT number, ID or Passport Number, Company Registration Number, Pet Microchip Number, Banking Details, Signature

9 RECORDS AVAILABLE IN TERMS OF ANY OTHER LEGISLATION

- Basic Conditions of Employment Act No. 75 of 1997
- Collective Investments Schemes Control Act No. 45 of 2002
- Companies Act No. 71 of 2008
- Compensation for Occupational Injuries and Health Diseases Act No. 130 of 1993
- Consumer Protection Act No. 68 of 2008
- Employment Equity Act No.55 of 1998
- Financial Advisory and Intermediary Services Act No. 37 of 2002
- Financial Intelligence Centre Act No. 38 of 2001
- Financial Institutions (Protection of Funds) Act No. 28 of 2001
- Financial Services Board Act No. 97 of 1990
- Financial Services Ombud Schemes Act No. 37 of 2004

Friendly Societies Act No. 25 of 1956
Income Tax Act No. 58 of 1962
Insurance Laws Amendment Act No. 27 of 2008
Labour Relations Act No. 66 of 1995
Medical Schemes Act No. 131 of 1998
Occupational Health and Safety Act No. 85 of 1993
Pension Funds Act No. 24 of 1956
Prevention of Organised Crime Act No. 121 of 1998
Protection of Constitutional Democracy against Terrorist and Related Activities Act No. 33 of 2004
Security Services Act No. 36 of 2004
Short Term Insurance Act No. 53 of 1998
Skills Development Act No.97 of 1998
Skills Development Levies Act No. 9 of 1999
Unemployment Contributions Act No. 4 of 2002
Unemployment Insurance Act No. 63 of 2001
Value Added Tax Act No. 89 of 1991

Companies Act 71 of 2008 Records

- Documents of Incorporation
- Memorandum of Incorporation
- Records relating to the appointment of directors/auditors/secretary/public officer and other officers.
- Share Register and other Statutory Registers.
 - o Shareholders Agreement
 - o Share Certificates
 - o Minutes of Shareholder Meetings
 - o Resolutions
- Authorised Financial Service Provider Records

Financial Records

- Annual Financial Statements
- Annual Tax Returns
- Accounting Records
- Bank Statements
- Invoices

Income Tax Records

- PAYE Records
- Documents issued to employees for Income Tax Purposes
- Records of payment made to SARS on behalf of employees
- VAT Records
- Skills Development Levies
- UIF
- Workman's Compensation

Personal Documents and Records

- Employment Contracts
- Disciplinary Records
- Salary Records

- Leave Records
- Training Records

Operations

- Compliance Manual – FAIS
- Compliance reports
- Contractual Agreements with providers
- Procedures Manual – FICA
- Register of premature cancellation of products
- Client Database/Register

Client Records

- Client Application Forms
- Client Supporting Documentation required by Provider

10 ACCESS TO INFORMATION OFFICER

Our Information Officer is responsible for managing and facilitating access to information requests. They can be contacted for assistance in making information requests and for any PAIA-related inquiries.

ARCO360 is committed to maintaining accurate and up-to-date records in compliance with relevant legislation.

ARCO360 complies with POPIA's provisions regarding the protection and access to personal information. Requests for personal information should be made in accordance with the procedures outlined in this manual.

11 REQUEST FOR ACCESS TO PERSONAL INFORMATION

Section 22 of the Protection of Personal Information Act, states that a person to whom the personal information is related, may request a responsible party to confirm that they are holding personal information about the person (data subject) and may obtain a description of the information and details about who has had access to it.

Where such a request is received, the matter must be referred to the Information Officer who will ensure that the correct procedures are adopted.

Section 23 of the Protection of Personal Information Act provides for a right to request correction of personal information held by a responsible party if it is inaccurate, incomplete, misleading, out of date, and obtained unlawfully, irrelevant or excessive. Where such a request is received, the matter must be referred to the Information Officer who will ensure that the correct procedures are adopted.

12 REQUEST TO ACCESS INFORMATION /RECORDS

In order to request access to a record the requester must:

- Use the prescribed form to make the request for access to a record. Request forms are available from our offices or at www.arco360.co.za
- Address the request to the Head of Business named in Section 4 above. This

request must be made to the address, or electronic mail address of the business.

- Provide sufficient detail on the request form to enable the Head of Business to identify the record and the requester.
- Indicate which form of access is required.
- Indicate what form of communication the Company should use to inform the requester and furnish the necessary particulars to ensure accurate and timeous communication.
- The requester must identify the right that is sought to be exercised or to be protected and must provide an explanation of why the requested record is required for the exercise or protection of that right
- If a request is made on behalf of another person, the requester must submit proof of the capacity in which the requester is making the request to the satisfaction of Head of Business/
- The prescribed request fee must be attached in relation to request for access to information.

Arco 360 (Pty) Ltd. (Arco 360) will respond to your request within 30 days of receiving the request by indicating whether your request for access has been granted or denied.

Please note that the successful completion and submission of a request for access form does not automatically allow the requestor access to the requested record.

Access will be granted to a record only if the following criteria are fulfilled:

- The record is required for the exercise or protection of any right; and
- The requestor complies with the procedural requirements set out in the Act relating to a request; and
- Access to the record is not refused in terms of any ground for refusal as contemplated in Chapter 4 of Part 3 of the Act.

13 DENIAL OF ACCESS

Access to any record may be refused under certain limited circumstances. These include:

- The protection of personal information from unreasonable disclosure concerning any natural person;
- The protection of commercial information held concerning any third party (for example trade secrets);
- The protection of financial, commercial, scientific or technical information that may harm the commercial or financial interests of any third party;
- Disclosures that would result in a breach of a duty of confidence owed to a third party;
- Disclosures that would jeopardize the safety or life of an individual;
- Disclosures that would prejudice or impair the security of property or means of transport;
- Disclosures that would prejudice or impair the protection of a person in accordance with a witness protection scheme;

- Disclosures that would prejudice or impair the protection of the safety of the public;
- Disclosures that are privileged from production in legal proceedings unless the privilege has been waived;
- Disclosures of details of any computer programme;
- Disclosures that will put Arco360 (Pty) Ltd at a disadvantage in contractual or other negotiations or prejudice it in commercial competition;
- Disclosures of any record containing any trade secrets, financial, commercial, scientific, or technical information that would harm the commercial or financial interests of Arco360 (Pty) Ltd
- Disclosures of any record containing information about research and development being carried out or about to be carried out by Arco360 (Pty) Ltd

If access to a record or any other relevant information is denied, our response will include:

- Adequate reasons for the refusal; and
- Notice that you may lodge an application with the court against the refusal and the procedure including details of the period for lodging the application.

14 FEES

The applicable fees are prescribed in terms of the Regulations promulgated under the Act. There are two basic types of fees payable in terms of the Act.

REQUEST FEE

A requester who seeks access to a record containing personal information about that requester is not required to pay the request fee. Every other requester, who is not a personal requester, must pay the required request fee.

The head of the private body must notify the requester (other than a personal requester) by notice, requiring the requester to pay the prescribed fee (if any) before further processing the request.

The non-refundable request fee of R 50 (excluding VAT) is payable on submission of any request for access to any record. If the request is granted then a further access fee must be paid for the search, reproduction, preparation and for any time that has exceeded the prescribed hours to search and prepare the record for disclosure.

ACCESS FEE

The access fee is payable prior to being permitted access to the records in the required form. The applicable fees are prescribed in terms of Part III of Annexure A as identified in Government Notice Number 187, Regulation 11.

15 PROTECTION OF PERSONAL INFORMATION

Arco 360's mission is to strive to maintain the highest level of care and diligence to ensure compliance with the Protection of Personal Information Act 4 of 2013. (PoPIA)

By acting as a custodian and collator of personal information, Arco 360 shall apply all

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applicable laws and legislation in a consistent manner to ensure that personal information be processed lawfully and in a reasonable manner; that does not infringe on the privacy of the data subject.

Arco 360 has published an Information Privacy and Protection Policy on the Company website www.arco360.co.za, which provides information on how the Company complies with the conditions of PoPIA. Any additional information may be requested as described in Section 12 herein.

Arco 360 is a paperless environment. The electronic retention of records practice is implemented and maintained in line with the business, industry, legal and statutory requirements.

In the event of a potential or actual data breach incident, Arco 360 shall record and investigate the root cause of the incident and report to the Information Regulator as required by PoPIA. Communication of a data breach shall be determined subsequent to the investigation findings and on advisement of the Information Regulator.

Arco 360 has appointed an Information Officer, an employee within the organisation, to encourage and ensure compliance, accountability and responsibility in terms of relevant legislation. See Section 2 herein.

This Manual is available at the offices of the Information Regulator. The Manual is also available at www.arco360.co.za

Copies may also be obtained from the Information Protection Officer of Arco360 (Pty) Ltd. In respect of hard copies, any transmission costs or postage will be for the account of the requester.

16 COMPLIANCE WITH POPIA

ARCO360 complies with POPIA, including data protection measures, consent, and data breach response procedures.

ARCO360 will prepare an annual report on its compliance with PAIA and submit it to the Information Regulator, as required by law.

Our organization is committed to ongoing compliance with PAIA. We regularly review our procedures and practices to ensure they align with the requirements of the Act.

This PAIA Manual will be reviewed periodically to ensure it remains accurate and up to date. Any necessary updates will be made to reflect changes in legislation or organizational practices.

ARCO360 is committed to promoting transparency, accountability, and the responsible handling of information. We strive to uphold the principles of PAIA and POPIA in our operations, and this PAIA Manual serves as a testament to our commitment to openness and compliance with relevant legislation.

Date: 20 June 2024

A handwritten signature in black ink, appearing to read 'Genevieve McNeill', written in a cursive style.

Signature:

Genevieve McNeill

Managing Director

ARCO360 (PTY) LTD: PAIA Manual Version: 3