




PAIA MANUAL

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

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This manual has been prepared in terms of section 51 of the Promotion of Access to Information Act 2 of 2000 (as amended) (PAIA)


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FORM 2 (REGULATION 7): REQUEST FOR ACCESS TO RECORD

FORM 3 (REGULATION 8): OUTCOME OF REQUEST AND OF FEES PAYABLE


FORM 1 (REGULATION 2): OBJECTION TO PROCESSING

FORM 2 (REGULATION 3): REQUEST FOR CORRECTION OR DELETION

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1 Definitions

Scope:	
Registration numbers: 	Companies duly registered in terms of South African Companies Act: 
2017/169658/07	Insight Solutions Group (Pty) Ltd.
2002/016023/07	Insight Actuarial Solutions (Pty) Ltd.
2019/205265/07	Insight Advisory Solutions (Pty) Ltd.
2023/266434/07	Insight Data Solutions (Pty) Ltd.
2023/266268/07	Insight Health Solutions (Pty) Ltd.
1999/021278/07	Insight Life Solutions (Pty) Ltd.
2018/001955/07	Leaf Strategic Projects (Pty) Ltd.
2002/018543/07	Health Data Metrics (Pty) Ltd.
(hereinafter referred to as <i>The Group</i>)	
Term	Definition
Registered Address:	2nd Floor, Gateway West Offices, 22 Magwa Crescent, Waterfall City, Midrand, 2066
Client	Any natural or juristic person that received or receives services from any of above entities.
Complainant	Any person who lodges a complaint with the Information Regulator
Complaint	(a) A matter reported to the Information Regulator in terms of section 74(1) and (2) of the Act; (b) A complaint referred to in section 76(1)(e) and 92(1) of the Act; (c) A matter reported or referred to the Information Regulator in terms of other legislation that regulates the mandate of the Information Regulator
Conditions for Lawful Processing	The conditions for the lawful processing of personal information as fully set out in chapter 3 of POPI and in section 12 of this manual
Data Subject	The person to whom Personal Information relates
Day	A calendar day, unless the last day of a specified period happens to fall on a Sunday or public holiday, in which case it is calculated exclusive of that Sunday or public holiday (Interpretation Act, 1957 - Act No. 33 of 1957)
DIO	Deputy Information Officer


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Scope:	
Information Officer/IO	The individual who is identified herein and legally appointed to ensure compliance with POPIA and PAIA
Manual	This manual
Minister	Minister of Justice and Correctional Services
Office Hours	(a) For the Information Regulator: 08:00–16:00, Monday to Friday (excluding public holidays); (b) For designated offices: Hours during which the offices operate
PAIA	The Promotion of Access to Information Act, No. 2 of 2000
Personal Information	Information relating to an identifiable living person, or an identifiable existing juristic person, including but not limited to race, gender, contact info, biometrics, correspondence, opinions, and identifiers
Personnel	Any person who works for or provides services to or on behalf of <i>The Group</i> and receives or is entitled to receive remuneration, including permanent, temporary and part-time staff, directors, and contractors
POPI/POPIA	The Protection of Personal Information Act, No. 4 of 2013
POPI Regulations	Regulations promulgated in terms of section 112(2) of POPI
Private Body	(a) A natural person conducting business; (b) A business partnership; (c) A juristic person not being a public body
Processing	Any operation or activity concerning personal information, including collection, storage, dissemination, or destruction
Regulator	Information Regulator established in terms of POPIA
Republic	Republic of South Africa
Signature	Any legally accepted form of signature, including electronic signature where applicable
Writing	As referred to in section 12 of the Electronic Communications and Transactions Act, 2002 (Act No. 25 of 2002)

2 Purpose of the PAIA Manual

This PAIA Manual is useful for the public to:

2.1 The PAIA Manual serves as a public guide to the information held by the organisation and how it can be accessed. It outlines the categories of records available without a formal

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request, the subjects on which records are maintained, and details of records accessible under other legislation. The manual also provides the official contact details of the Information Officer (IO) and Deputy Information Officer (DIO), who are responsible for assisting the public in exercising their right of access.

2.2 The manual further explains how to use the PAIA process and where to obtain the official guide published by the Regulator. It describes whether and how the organisation processes personal information, including the purposes of processing, the categories of data subjects involved, and the recipients (local or international) to whom such information may be supplied. The manual further confirms that appropriate security safeguards are in place to protect the confidentiality, integrity, and availability of personal information.

3 Key Contact Details for Access to Information of *The Group*

3.1 Information Officer contact details.

Name of Information Officer	Barry Allan Childs
Contact number	011 541 0910
Email	Barryc@insight.co.za


3.2 Deputy Information Officer (DIO) - none designated

3.3 National or head office details

Postal address	PostNet Suite #026, Private Bag X 159, Halfway House, Midrand, 1685
Physical address	2 nd Floor, Gateway West Offices, 22 Magwa Crescent, Waterfall City, Midrand, 2066
Contact number	011 541 0910
Email	Info@insight.co.za informationofficer@insight.co.za

4 Guide on how to use PAIA and how to Obtain Access to the Guide

4.1 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.

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

4.3 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.

4.4 The guide can also be obtained:

4.4.1 Upon request to the IO of *The Group*;

4.4.2 From the Information Regulator (<https://info regulator.org.za/paia-guidelines/>).

Physical address	Woodmead North Office Park, 54 Maxwell Drive, Woodmead, Johannesburg, 2191
Contact numbers	Tel: +27 (10) 023-5200 Toll-free: 0800 017 160
General Email	enquiries@info regulator.org.za
PAIA complaints	PAIAComplaints@info regulator.org.za
Website	https://info regulator.org.za/

5 Latest Notices in terms of Section 52(2) of PAIA

At this stage, no notice(s) has/have been published on the categories of records that are available without having to request access to them in terms of PAIA.

6 Availability of Certain Records in terms of PAIA

6.1 Categories of records of *The Group* which are available without a person having to request access:

Category of Records	Types of the Record	Available on Website	Available on Request
Company overview	Company profile, business activities, contact details,	X	
Policies (public-facing)	Privacy policy, website cookies policy and PAIA manual	X	
Disclosures	Legal disclaimers, Case Studies, and events.	X	
Public marketing materials and vacancies	Brochures, product offerings, public service descriptions, news updates, vacancies	X	


6.2 Description of the records available in accordance with any other legislation:



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Category of Records	Applicable Legislation
Memorandum of Incorporation, Company registration documents, minutes of board meetings, share register, Organisational structure	Companies Act, 71 of 2008
Employment contracts, employee attendance records, payroll information, leave records	Basic Conditions of Employment Act, 75 of 1997
Disciplinary records, grievance procedures, union agreements, Commission for Conciliation, Mediation and Arbitration (CCMA) documentation, Curriculum Vitae (CV) and Application details.	Labour Relations Act, 66 of 1995
Tax returns, IRP5 certificates, Pay-As-You-Earn (PAYE) records, employee tax submissions, payment history,	Income Tax Act, 58 of 1962
Tax records, correspondence with SARS, assessments, objections, rulings, supporting documentation.	
Workplace Skills Plans (WSPs), annual training reports, learnership agreements	Skills Development Act, 97 of 1998
Unemployment Insurance Fund (UIF) contribution records, declarations, and employee benefit claim records	Unemployment Insurance Act, 63 of 2001
Health and safety audits, incident reports, risk assessments, and safety committee records	Occupational Health and Safety Act, 85 of 1993
Value-Added Tax (VAT) returns, VAT number, input/output tax records, SARS correspondence	Value-Added Tax Act, 89 of 1991
Workers Compensation Assistance (WCA) claims, injury-on-duty reports, compensation records, letter of good standing.	Compensation for Occupational Injuries and Diseases Act, 130 of 1993
Ownership documentation and supplier certificates	Broad-Based Black Economic Empowerment Act, 53 of 2003
Client contracts/terms and conditions, complaint records, marketing disclaimers, product/ service terms and conditions, performance standards and service timelines, payment confirmations, Emails with clients, suppliers, or agents, electronic contracts or signed consent forms, E-commerce payment data and transaction logs, Website terms and privacy notices	Consumer Protection Act, 68 of 2008
Data subject consent forms, privacy notices, PAIA Manual, operator agreements, processing activity	Protection of Personal Information Act, 4 of 2013


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Category of Records	Applicable Legislation
records, Risk assessments, Data privacy Impact Assessments, Photographs and Videos of projects we are involved with and the staff.	Promotion of the Access to Information Act.
Insurance risk assessments, actuarial valuations, capital adequacy reports, governance records, regulatory submissions, insurance analytics and modelling records.	Insurance Act 18 of 2017
Medical scheme member data, claims data, healthcare utilisation records, actuarial reports, scheme valuations, regulatory submissions, governance reports, risk management records.	Medical Schemes Act, 131 of 1998
Compliance records, regulatory correspondence, governance documentation, reporting records.	Financial Sector Regulation Act 9 of 2017


6.3 The above-mentioned records may be requested; however, it should be noted that there is no guarantee that the request will be honoured. Each request will be evaluated in terms of PAIA and any other applicable legislation.

7 Request Process

- 7.1 An individual who wishes to place a request must comply with all the procedures laid down in PAIA.
- 7.2 The requester must complete **FORM 2 (REGULATION 7)** herein, which is attached hereto and submit it to the IO at the details specified herein.
- 7.3 The prescribed form as well as payment of a request fee and a deposit (if applicable) must be submitted to the IO at/via the postal or physical address, fax number or email address as is stated herein.
- 7.4 The prescribed form must be completed with enough particularity to enable the IO to determine:
- 7.4.1 The record(s) requested;
 - 7.4.2 The identity of the requester;
 - 7.4.3 What form of access is required; and
 - 7.4.4 The postal address or fax number of the requester.

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- 7.5 The requester must state that the records are required for the requester to exercise or protect a right and clearly state what the nature of the right is so to be exercised or protected. An explanation of why the records are requested is required to exercise or protect the right.
- 7.6 The request for access will be dealt with within 30 (thirty) days from date of receipt, unless the requester has set out special grounds that satisfy the IO that the request be dealt with sooner.
- 7.7 The period of 30 (thirty) days may be extended by not more than 30 (thirty) additional days, if the request is for a large quantity of information, or if the request requires a search for information held at another office of *The Group* and the information cannot be reasonably obtained within 30 (thirty) days. The IO will notify the requester in writing should an extension be necessary.
- 7.8 The IO must communicate a response to the request for access using **FORM 3 (REGULATION 8)** herein. This communication shall inform the requester of:
- 7.8.1 The decision; and
 - 7.8.2 Fees payable.
- 7.9 In the event that the IO is of the opinion that the searching and preparation of the record for disclosure would amount to more than six (6) hours, he/she shall inform the requester to pay a deposit not exceeding one third of the amount payable.
- 7.10 Should the requester have any difficulty with the form or the process laid out herein, the requester should contact the IO for assistance.
- 7.11 An oral request can be made to the IO should the requester be unable to complete the form due to illiteracy or a disability. The IO will then complete the form on behalf of the requester and provide a copy of the form to the requester.
- 7.12 **FORM 2 (REGULATION 3)** herein (Request for Correction or Deletion) is used by a data subject to request the correction of inaccurate, outdated, incomplete, irrelevant, or misleading personal information, and/or the deletion or destruction of personal information that is no longer necessary or unlawfully obtained, in accordance with Section 24(1) of POPIA. It ensures that *The Group* maintain accurate and lawful records of personal data.

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8 Grounds for Refusal

The following are grounds upon which *The Group* may, subject to the exceptions in chapter 4 of PAIA, refuse a request for access in accordance with chapter 4 of PAIA:

- 8.1 Mandatory protection of the privacy of a third party who is a natural person, including a deceased person, where such disclosure of personal information would be unreasonable.
- 8.2 Mandatory protection of the commercial information of a third party, if the records contain:
 - 8.2.1 Trade secrets of that third party;
 - 8.2.2 Financial, commercial, scientific or technical information of the third party, the disclosure of which could likely cause harm to the financial or commercial interests of that third party; and/or
 - 8.2.3 Information disclosed in confidence by a third party to *The Group*, the disclosure of which could put that third party at a disadvantage in contractual or other negotiations or prejudice the third party in commercial competition.
- 8.3 Mandatory protection of confidential information of third parties if it is protected in terms of any agreement.
- 8.4 Mandatory protection of the safety of individuals and the protection of property.
- 8.5 Mandatory protection of records that would be regarded as privileged in legal proceedings.
- 8.6 Protection of the commercial information of *The Group*, which may include:
 - 8.6.1 Trade secrets;
 - 8.6.2 Financial/commercial, scientific or technical information, the disclosure of which could likely cause harm to the financial or commercial interests of *The Group*;
 - 8.6.3 Information which, if disclosed, could put *The Group* at a disadvantage in contractual or other negotiations or prejudice *The Group* in commercial competition; and/or
 - 8.6.4 Computer programs which are owned by *The Group*, and which are protected by copyright and intellectual property laws.
- 8.7 Research information of *The Group* or a third party, if such disclosure would place the research or the researcher at a serious disadvantage.
- 8.8 Requests for records that are clearly frivolous or vexatious, or which involve an unreasonable diversion of resources.

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9 Remedies Available to a Requester

The Group is a private body. There is no internal appeal against a decision of a private body under PAIA — internal appeals apply only to public bodies. Accordingly, where the Information Officer refuses a request (in whole or in part), fails to respond within the prescribed period, or makes any other decision in respect of a request, the requester has the following external remedies.

9.1 Complaint to the Information Regulator (section 77A of PAIA)

A requester (or a third party) who is aggrieved by a decision may lodge a complaint, in writing, with the Information Regulator. The complaint must be submitted on the prescribed Form 5 (Complaint in terms of section 77A of PAIA), which is available from the Information Regulator's website at www.inforegulator.org.za. A complaint must be lodged within 180 days of the decision (or of becoming aware of the action complained of). The Information Regulator may, on good cause shown, allow a complaint to be lodged after the 180-day period.


9.2 Application to court (sections 78 and 82 of PAIA)

A requester may, instead of or after a complaint to the Information Regulator, apply to a court with jurisdiction for appropriate relief. Such an application must be brought within 180 days of the decision (or, where a complaint was lodged with the Information Regulator, within 180 days of receipt of the outcome of that complaint). The court may grant any order that is just and equitable, including confirming, amending or setting aside the decision.

10 Fees

The following fees shall be payable upon request by a requester:

Details	Fee
Request fee (payable on every request)	R140.00 once-off
Photocopy of an A4 page or part thereof	R2.00 per page
Printed copy of an A4 page or part thereof	R2.00 per page
Hard copy on flash drive (flash drive to be provided by requester)	R40.00 once-off
Hard copy on a compact disc (compact disc to be provided by requester)	R40.00 once-off
Hard copy on a compact disc (compact disc to be provided by <i>The Group</i>)	R60.00 once-off
Transcription of visual images per A4 page	As per the quotation of the service provider

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Details	Fee
Copy of visual images	As per the quotation of the service provider
Transcription of an audio record	R24.00 per A4 page
Copy of an audio record on a flash drive (flash drive to be provided by requester)	R40.00 once-off
Copy of an audio on a compact disc (compact disc to be provided by requester)	R40.00 once-off
Copy of an audio on a compact disc (compact disc to be provided by <i>The Group</i>)	R60.00 once-off
Search and preparation:	R145.00 per hour (or part of an hour) excluding the first hour; capped at R435 per request.
Postage, email or any other electronic transfer	Actual expense, if any


11 Processing of Personal Information

11.1 Purpose of processing personal information:

11.1.1 **Employment-related purposes:** Recruitment, onboarding, administration of employment contracts, payroll administration, employee benefits management, performance management, training and professional development, occupational health and safety compliance, workforce planning, and compliance with applicable labour and employment legislation.

11.1.2 **Client, service provider, and stakeholder management:** Entering into and performing agreements with clients, medical schemes, health insurers, life insurers, employers, service providers, and other stakeholders; providing actuarial consulting, analytics, advisory, data management, business intelligence, risk management, and related professional services; managing client relationships; processing payments; conducting project administration; and responding to service-related queries, requests, or complaints.

11.1.3 **Data analytics, actuarial modelling, and advisory services:** Collecting, analysing, modelling, and interpreting information for actuarial, statistical, analytical, healthcare, insurance, investment, risk management, forecasting, business intelligence, research, reporting, and advisory purposes; developing and maintaining analytical tools, models, and methodologies; and producing insights to support client decision-making and regulatory compliance.

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11.1.4 **Legal, regulatory, and professional compliance:** Complying with applicable statutory, regulatory, contractual, professional, and governance requirements, including record keeping, audits, regulatory reporting, professional standards, risk assessments, litigation management, investigations, and the exercise or defence of legal rights and obligations.


11.1.5 **Security, health, and risk management:** Protection of company assets, confidential information, intellectual property, systems, and facilities, managing information security and cybersecurity risks, monitoring access to offices and systems, preventing and detecting fraud, misconduct, and unauthorised activities, ensuring business continuity, and safeguarding employees, clients, contractors, service providers, and visitors.

11.1.6 **IT and systems management:** Administering, maintaining, and securing *The Group*'s information technology infrastructure, databases, analytical platforms, software applications, communication systems, and cloud services; managing user access and authentication; ensuring data quality, integrity, backup, retention, and recovery; monitoring system performance; and protecting personal information against unauthorised access, disclosure, alteration, loss, or destruction.

11.2 Processing of Special Personal Information (including Health Information):
In the course of its actuarial, healthcare, insurance and advisory work, *The Group* processes special personal information as contemplated in section 26 of POPIA, including health information — for example, medical scheme member data, claims and healthcare-utilisation data, occupational-health information, and disability information. Section 26 of POPIA generally prohibits the processing of special personal information unless an authorisation applies.

The Group processes such information only where one or more of the authorisations in section 27 of POPIA applies, namely (among others) where: the data subject has consented; the processing is necessary for the establishment, exercise or defence of a right or obligation in law; the information has deliberately been made public by the data subject; or the processing is for historical, statistical or research purposes subject to appropriate safeguards.

In particular, in relation to health information processed for or on behalf of insurers, medical schemes, medical scheme administrators, managed healthcare organisations, administrative bodies, pension funds and employers, *The Group* relies on the specific


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authorisations in sections 32(1)(b) and 32(1)(f) of POPIA, as interpreted by the Regulations Relating to the Processing of Data Subjects' Health Information by Certain Responsible Parties, 2026 (published under Government Notice 7198 in Government Gazette 54268 on 6 March 2026). These authorisations cover processing that is necessary for assessing risk to be insured or covered, the performance of an insurance or medical scheme agreement, the enforcement of contractual rights and obligations, and the implementation of laws, pension rules or collective agreements that create rights dependent on a data subject's health.

All processing of health information by *The Group* is undertaken subject to a duty of confidentiality imposed by law, office, employment, profession or written agreement, as contemplated in section 32(2) of POPIA. Where *The Group* processes health information as an operator on behalf of a responsible party, it does so only under a written operator agreement and on the documented instructions of that responsible party.

11.3 Description of the categories of data subjects and of the information or categories of information relating thereto:

Categories of Data Subjects	Personal Information that may be Processed
Service providers	Business details (name, registration number, VAT number, address), contact details of representatives, financial and banking information, contractual records, and trade information.
Employees	Personal details (name, identity number, contact details, demographic information), employment records (contracts, attendance, performance, training), qualifications, payroll and tax information, and information required for compliance with labour legislation.
Job applicants	Names, contact details, curriculum vitae, qualifications, employment history, and references.
Directors	Names, identity numbers, contact details, shareholding details, and records required in terms of the Companies Act.
Website users and/or visitors	Contact details provided through online platforms, IP addresses, browsing activity, and cookies where applicable.
Visitors to <i>The Group</i> premises	Names, contact details and video footages (Likeness)

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12 Transborder Flows of Personal Information and Security

12.1 We will only transfer personal information across South African borders if the relevant business transactions or situation requires trans-border processing and will do so only in accordance with South African legislative requirements, or if the data subject consents to the transfer of their personal information to third parties in foreign countries.


12.2 We will take steps to ensure that operators are bound by laws, binding corporate rules or binding agreements that provide an adequate level of protection and uphold principles for reasonable and lawful processing of personal information, in terms of POPIA.

12.3 Information Security Measures:

Description of information security measures (section 51(1)(e) of PAIA, read with section 19 of POPIA)

The Group has implemented appropriate, reasonable technical and organisational measures to secure the integrity and confidentiality of personal information in its possession or under its control, and to prevent loss of, damage to, or unauthorised destruction of personal information and unlawful access to or processing of it. These measures are maintained in line with generally accepted information security practices applicable to *The Group's* sector and are documented in *The Group's* internal policies. They include:

- **Information classification and handling** — information assets are classified and labelled (e.g. Confidential / Sensitive) and handled according to their classification, with health and other special personal information treated as the most sensitive.
- **Access control** — role-based access on a need-to-know basis, user authentication, and management of user access rights and privileged access.
- **Encryption** — encryption of personal information in transit and at rest, and secure configuration of networks, servers and user endpoint devices.
- **Network and endpoint security** — anti-malware/anti-virus and intrusion-prevention controls, secure configuration baselines, and protection of cloud services.
- **Logging and monitoring** — logging and monitoring of access to systems and information to detect and respond to anomalous or unauthorised activity.
- **Incident and breach management** — a formal information security incident and event management process, including assessment of the risk to data subjects and notification of affected data subjects and the Information Regulator where required by law.
- **Retention, secure disposal and destruction** — data protection and retention controls, and the secure disposal and destruction of records (both physical and electronic), including health records, to prevent any reasonably anticipated unauthorised use, disclosure of or access to the information following disposal.


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- **Physical and environmental security** — controlled access to premises and the physical securing of documentation and storage media when not in use.
- **Operators and third parties** — written operator (processor) agreements requiring operators to process personal information only on instruction and to maintain adequate, comparable security safeguards.

The Group reviews and updates these measures on an ongoing basis as part of its information security and POPIA compliance programme.

13 The Recipients or Categories of Recipients to whom the Personal Information may be Supplied

Category of Personal Information	Recipients or Categories of Recipients
Identity numbers, names, and contact details, Biometric	Government departments, Courts, tribunals, regulatory authorities, law enforcement agencies (e.g., the South African Police Service), and auditors, where legally required.
Qualifications and professional history	Verification agencies, the South African Qualifications Authority (SAQA), professional bodies, or recruitment service providers.
Financial, banking, credit and payment information	Registered credit bureaus, financial institutions, payment service providers, insurers, auditors, regulatory authorities and debt collection agencies (where applicable).
Health, disability, occupational health, and safety information, membership number, names,	Medical aid schemes, healthcare practitioners, occupational health service providers, insurers, employee wellness providers, and government authorities, where required by law.
Tax and payroll records	South African Revenue Service (SARS), pension/provident fund administrators, and employee benefit providers.
Health and safety information	Medical aid providers, occupational health practitioners, and the Department of Labour (where required).
Contractual and business information	Insurers, legal advisors, auditors, consultants, and suppliers or service providers engaged by <i>The Group</i> .
Digital and IT records	Cloud service providers, IT support vendors, and data security providers are subject to data protection safeguards.

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14 Availability of the Manual


A copy of the manual is available on *the Group's* website: at <https://www.insight.co.za>, and will also be provided to any person on request and to the Information Regulator on request.

15 Objection to the Processing of Personal Information by a Data Subject

- A data subject who wishes to object to the processing of personal information submits the objection to a responsible party at any time during the office hours of a responsible party and free of charge.
- A data subject who wishes to object to the processing of personal information must do so on a form substantially similar to **FORM 1 (REGULATION 2)** herein, free of charge and reasonably accessible to a data subject by hand, fax, post, email, SMS, or WhatsApp and or in any manner expedient to a data subject.
- A responsible party must, when collecting personal information of a data subject, notify the data subject of their right to object to the said processing.
- If an objection to the processing of personal information of a data subject is made telephonically, such an objection shall be electronically recorded by a responsible party and, upon request, be made available to the data subject in any manner, including the transcription thereof.

16 Request for Correction/Deletion of Personal Information or Destruction/Deletion of Record of Personal Information

- A data subject has the right, in terms of section 24 of the Act, to request, where necessary, the correction, destruction, or deletion of his, her or its personal information.
- A data subject, who wishes to request a correction or deletion of his, her, or its personal information, as provided for in section 24(1)(a) of the Act, has the right to request correction or deletion of personal information at any time and free of charge, if the personal information is inaccurate, irrelevant, excessive, out of date, incomplete, misleading or obtained unlawfully.
- A data subject who wishes to request the destruction or deletion of a record of his, her, or its personal information in terms of section 24(1)(b) of the Act, has the right to request the destruction or deletion of a record of his, her or its personal information at any time and free


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of charge, if a responsible party is no longer authorised to retain such information in terms of section 14 of the Act.

- A request for correction to or deletion of personal information must be submitted to a responsible party on a form which is substantially similar to **FORM 2 (REGULATION 3)** herein (POPIA Form 2, Regulation 3), free of charge and reasonably accessible to a data subject by hand, fax, post, email, SMS, WhatsApp message or in any manner expedient to a data subject.
- A request for a correction or deletion of personal information by telephonic means shall be recorded by a responsible party, and such recording must, upon request, be made available to a data subject in any manner, including the transcription thereof, which shall be free of charge.

17 Updating of the Manual

The Information Officer will update this manual regularly.

Name of IO	Barry A Childs
Title within the body	Group CEO & Director
Signature	
Date of approval	29 June 2026

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FORM 2 (REGULATION 7) — REQUEST FOR ACCESS TO A RECORD (in terms of PAIA)

Note:

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

TO: The Information Officer

Address: _____

Email address: _____

Fax number: _____

Mark with an "X"

Request is made in my own name	<input type="checkbox"/>
Request is made on behalf of another person	<input type="checkbox"/>

A. PERSONAL INFORMATION	
Full name(s)	
Identity number	
Postal address	
Street address	
Contact number(s) (w)	
Contact number(s) (c)	
Fax number	
Email address	
Full name of person on whose behalf request is made (if applicable)	
Identity number	



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Postal address	
Street address	
Contact number(s) (w)	
Contact number(s) (c)	
Email address	

B. PARTICULARS OF RECORD 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 available	



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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 (<i>this includes photographs, slides, video recordings, computer-generated images, sketches, etc.</i>)	
	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 record (<i>including copies of any virtual images, transcriptions and information held on computer or in an electronic or machine-readable form</i>)	
	Written or printed transcription of virtual images (<i>this includes photographs, slides, video recordings, computer-generated images, sketches, etc.</i>)	
	Transcription of soundtrack (<i>written or printed document</i>)	
	Copy of record on flash drive (<i>including virtual images and soundtracks</i>)	
	Copy of record on compact disc drive (<i>including virtual images and soundtracks</i>)	
	Copy of record saved on cloud storage server	



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Manner of access (mark the applicable box with an "X")	Personal inspection of record at registered address of public/private body (<i>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</i>)	
	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)	
	Email 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*)

C. PARTICULARS OF RIGHT TO BE EXERCISED OR PROTECTED


If the provided space is inadequate, please continue on a separate page and attach it to the form. The requester must sign all of 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	
---	--

D. FEES

- a) *A request fee must be paid before the request will be considered.*
- b) *If approved, 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.*

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Reason	
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You will be notified in writing whether your request has been approved or denied and if approved the costs relating to your request, if any. Please indicate your preferred manner of correspondence:

Postal address	
Electronic communication (please specify)	

Signed at	
Date	
Signature of requester/person on whose behalf request is made	

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Reference number	
Request received by	<i>(State Rank, Name and Surname of Information Officer)</i>
Date received	
Access fees	
Deposit (if any)	
Signature of Information Officer	

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FORM 3 (REGULATION 8) — OUTCOME OF REQUEST AND OF FEES PAYABLE (in terms of PAIA)

If your request is granted:

1. Amount of the deposit, if any, is payable before your request is processed; and
2. Requested record/portion of the record will only be released once proof of full payment is received.

Please use the following reference number in all future correspondence: _____

TO: _____

Your request dated _____ refers

A. You Requested	
Personal inspection of information at registered address of public/private body <i>(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)</i> which is free of charge. If the request is granted, you are required to make an appointment for the inspection of the information and to bring this form with you. If you then require any form of reproduction of the information, you will be liable for the fees as detailed herein the Fees section of this PAIA Manual.	
OR	
Printed copies of the information <i>(including copies of any virtual images, transcriptions and information held on computer or in an electronic or machine-readable form)</i>	
Written or printed transcription or virtual images <i>(this includes photographs, slides, video recordings, computer-generated images, sketches, etc.)</i>	
Transcription of soundtrack <i>(written or printed document)</i>	
Copy of information on flash drive <i>(including virtual images and soundtracks)</i>	
Copy of information on compact disc drive <i>(including virtual images and soundtracks)</i>	
Copy of record saved on cloud storage server	
B. To Be Submitted	
Postal services to postal address	
Postal services to street address	



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Courier service to street address	
Facsimile of information in written or printed format (including soundtracks if possible)	
Cloud share/file transfer	
Preferred language <i>(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)</i>	

C. Outcome	
Kindly note that your request has been approved	
Kindly note that your request has been denied	
Reasons for denial:	

Fees payable with regard to your request

Item	Cost per A4-size Page or Part Thereof/Item	Number of Pages/Items	Total
Photocopy			
Printed copy			
For a copy in a computer-readable form on:			
Flash drive (to be provided by requester)	R40.00		
Compact disc (if provided by requester)	R40.00		
Compact disc (if provided to requester)	R60.00		
Transcription of visual images per A4-size page	Service to be outsourced – will depend on service provider quotation		
Copy of visual images	Service to be outsourced – will depend on service provider quotation		

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Transcription of an audio record, per A4-size	R24.00		
Copy of an audio record on			
Flash drive (to be provided by requester)	R40.00		
Compact disc (if provided by requester)	R40.00		
Compact disc (if provided to requester)	R60.00		
Postage, email or any other electronic transfer	Actual costs		
TOTAL			


Deposit Payable			
Yes			
No			
Hours of search		Amount of deposit (<i>calculated on one third of total amount per request</i>)	

The amount must be paid in the following bank account:

Name of bank	Nedbank Limited
Name of account holder	Insight Solutions Group (Pty) Ltd
Type of account	Current
Account number	1165487284
Branch code	198765
Reference nr	Your name
Submit proof of payment to	info@insight.co.za

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Signed at	
Date	
Signature of Information Officer	

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FORM 1 (REGULATION 2) — Regulations Relating to the Protection of Personal Information, 2021 (POPIA); objection under section 11(3) of POPIA

OBJECTION TO THE PROCESSING OF PERSONAL INFORMATION IN TERMS OF SECTION 11(3) OF THE PROTECTION OF PERSONAL INFORMATION ACT, 2013 (ACT NO. 4 OF 2013)

**REGULATIONS RELATING TO THE PROTECTION OF PERSONAL INFORMATION, 2021
[Regulation 2]**

Note:

1. If the space provided for in this form is inadequate, submit information as an annexure to this form, and sign each page.
2. Complete as is applicable.

A. DETAILS OF DATA SUBJECT	
Name(s) and surname/registered name	
Postal or business address	
Code	
Contact number(s)	
Email address	
B. DETAILS OF RESPONSIBLE PARTY	
Name(s) and surname/Registered name	
Postal or business address	
Code	
Contact number(s)	
Email address	
C. REASONS FOR OBJECTION IN TERMS OF SECTION 11(3)(a)	
<i>Detailed reasons for the objection</i>	

Signed at	
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Date	
Signature of data subject/designated person	

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FORM 2 (REGULATION 3) — Regulations Relating to the Protection of Personal Information, 2021 (POPIA); request under section 24(1) of POPIA

REQUEST FOR CORRECTION OR DELETION OF PERSONAL INFORMATION OR DESTROYING OR DELETION OF RECORD OF PERSONAL INFORMATION IN TERMS OF SECTION 24(1) OF THE PROTECTION OF PERSONAL INFORMATION ACT, 2013 (ACT NO. 4 OF 2013)

**REGULATIONS RELATING TO THE PROTECTION OF PERSONAL INFORMATION, 2021
[Regulation 3]**

Note:

1. Affidavits or other documentary evidence as applicable in support of the request may be attached.
2. If the space provided for in this form is inadequate, submit information as an annexure to this Form and sign each page.
3. Complete as is applicable.

Mark the appropriate boxes with an "X".

A. REQUEST	
Request for correction of personal information about the data subject which is in possession or under the control of the responsible party	
Request for destruction of personal information about the data subject which is in possession or under the control of the responsible party	
Request for deletion of personal information about the data subject which is in possession or under the control of the responsible party	
B. APPLICABLE REASONS FOR THE SELECTED REQUEST	
Inaccurate	
Irrelevant	
Excessive	
Out of date	
Incomplete	
Misleading	
Obtained unlawfully	
C. PREFERRED REMEDY	
I request correction to a record of personal information about the data subject which is in the possession or under the control of the responsible party who is no longer	



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authorised to retain the record of information	
I request destruction of a record of personal information about the data subject which is in the possession or under the control of the responsible party who is no longer authorised to retain the record of information	
I request deletion of a record of personal information about the data subject which is in the possession or under the control of the responsible party who is no longer authorised to retain the record of information	

D. DETAILS OF DATA SUBJECT

Name(s) and surname/registered name	
Postal or business address	
Code	
Contact number(s)	
Email address	

E. DETAILS OF RESPONSIBLE PARTY

Name(s) and surname/Registered name	
Postal or business address	
Code	
Contact number(s)	
Email address	

F. PERSONAL INFORMATION TO BE CORRECTED/DESTROYED/DELETED
(Please specify the personal information required to be corrected/destroyed/deleted)

--

G. EXPLANATION FOR THE SELECTED REASON FOR A REQUEST
(Please provide detailed explanation for the selected reasons for the request for correction/destruction/



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deletion of personal information which is in possession or under the control of the responsible party)

Signed at	
Date	
Signature of data subject/designated person	