



IWCP Johannesburg (Pty) Ltd

Company Reg: (2018/463016/07)

Hanmat Financial Trading 2610 (Pty) Ltd

Company Reg: (2014/231586/07)

Resolute Wealth Partners (Pty) Ltd

Company Reg: (2019/313845/07)

Integrated Financial Solutions (Pty) Ltd

Company Reg: (2014/264114/07)

IWCP KZN (Pty) Ltd

Company Reg: (2021/441788/07)

Affiliates of Liberty

(“IWCP Group”)

PAIA Information Manual

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Promotion of Access to Information Act, 2 of 2000



Table of Contents

INTRODUCTION.....	4
AVAILABILITY OF THIS MANUAL.....	4
REQUESTS FOR INFORMATION.....	5
INFORMATION OFFICER CONTACT DETAILS.....	5
IWCP GROUP AND/OR LIBERTY PRIVACY PRACTICES.....	5
We collect personal or other information to:.....	5
Personal information may be received from or provided to:.....	5
Employee personal information may be received from or provided to:.....	6
Our security practices.....	6
TYPES OF RECORDS HELD BY IWCP GROUP AND/OR LIBERTY.....	6
Company records.....	6
Finance and accounting records.....	6
Operational records;.....	6
Types of personal information held by IWCP Group and/or Liberty.....	7
Other Parties.....	8
Publicly available records.....	8
Records available in accordance with other legislation.....	8
STEPS TO CONSIDER BEFORE SUBMITTING A REQUEST.....	9
Step 1: Are you requesting your own information?.....	9
Step 2: Are you entitled to use the Act to request access?.....	9
Step 3: Does the information requested exist in the form of a record?.....	9
Step 4: Is the record in the possession or under the control of IWCP Group and/or Liberty?.....	9
HOW TO SUBMIT REQUEST FOR ACCESS.....	10
Request form.....	10
Description of the right.....	10
Representatives.....	10
Illiteracy or disability.....	10
Prescribed fees.....	10
PRESCRIBED FEES.....	11
CONSIDERING YOUR REQUEST.....	12
YOUR REMEDIES.....	13
ANNEXURE 1:.....	14
REQUEST FOR ACCESS TO RECORDS OF PRIVATE BODY.....	14
ANNEXURE 2:.....	19



FEES IN RESPECT OF PRIVATE BODIES.....	19
ANNEXURE 3:	20
IWCP Group – BASIC INFORMATION	20

INTRODUCTION

This information manual is in respect of the IWCP Group, consisting of the juristic entities listed on the first page of this Manual, all of whom constitute an affiliate of Liberty Group Limited ("Liberty" who conducts business as a long-term insurer and authorised financial services provider in terms of the FAIS Act under FSP licence number 2409). IWCP Group has operating units and partnerships in Johannesburg, Pretoria, Rustenburg, Mpumalanga and KZN.

This information manual ("Manual") provides an outline of the types of records held by IWCP Group for and on behalf of Liberty and/or Liberty and/or FAIS representatives contracted with Liberty and explains how one may submit requests for access to these records in terms of the Promotion of Access to Information Act, 2 of 2000 (the "Act").

The Act gives effect to everyone's constitutional right of access to information held by private sector bodies (e.g. companies) or public bodies (i.e. Government institutions) that is required for the exercise and/or protection of the requester's rights.

A guide to the Act is available from the South African Human Rights Commission ("SAHRC") website: www.sahrc.org.za. It describes, in each official language:

- What the objectives of this Act are;
- The details of each private body (where possible);
- The process that needs to be followed in order to make a request;
- How to get copies of the Guide at no charge;
- How to get access to the manual of a private body; and
- All the remedies available in law to you.

Should you have any queries in this regard, please contact the SAHRC directly at:

The South African Human Rights Commission: PAIA Unit The Research and Documentation Department

Postal address: Private Bag 2700
Houghton 2041

Tel: +27 11 887-3803

Fax: +27 11 403-0625

Website: www.sahrc.org.za

E-mail: paia@sahrc.org.za

AVAILABILITY OF THIS MANUAL

You, the requester, can access this Manual on our website (www.iwcp.co.za) or by requesting a copy by e-mail from the Information Officer as provided for in paragraph 4 below.



REQUESTS FOR INFORMATION

You may submit your request for information records to the Information Officer as provided for in paragraph 4 below. It is recommended that you read this manual first, in particular paragraphs 6 through 9, before submitting any requests.

INFORMATION OFFICER CONTACT DETAILS

Information Officer: Deirdre Geysler
Address: 4 Kikuyu Road
Sunninghill
2157
Tel: 011 678 8904
E-mail: info@iwcp.co.za

IWCP GROUP AND/OR LIBERTY PRIVACY PRACTICES

We collect personal or other information to:

- Meet our responsibilities to customers, employees and other natural or juristic persons;
- Follow your instructions;
- Inform you of new services; and
- Make sure our business suits your needs.

Personal information may be received from or provided to:

- any regulatory authority (like the Financial Sector Conduct Authority) and the regulators which may be appointed for the various financial sectors;
- comply with any regulation passed under the relevant legislation, or any legal process
- protect and defend IWCP Group and/or Liberty's rights and property (including intellectual property);
- protect public interest;
- Brokers / advisers / intermediaries;
- Group companies, including STANLIB Limited and/or Standard Bank Group; and/or
- Third party service providers in order to uphold contractual obligations or service customers.

Trans-border information flows: IWCP Group and/or Liberty may share with or receive personal information from parties as set out above, where these parties reside outside of the Republic of South Africa.

All operations are required to abide by IWCP Group and/or Liberty's policies, procedures and guidelines, regardless of legislative requirements for data protection in these countries.



Employee personal information may be received from or provided to:

- Pension / provident funds and/or their trustees
- Medical aid funds
- Recruitment companies
- Credit bureaux

Our security practices

- We are committed and obliged to implement all reasonable controls to safeguard access to your personal information.
- Where third parties are required to process your personal information in relation to the purposes set out in this manual and for other legal requirements, we ensure that they are contractually bound to apply the appropriate security practices.
- All use of our website and transactions through it are protected by encryption (secret codes) in line with international standards.

TYPES OF RECORDS HELD BY IWCP GROUP AND/OR LIBERTY

IWCP Group and/or Liberty maintain records on the following categories and subject matters. However, please note that recording a category or subject matter in this Manual does not imply that a request for access to such records would be granted. All requests for access will be evaluated on a case-by-case basis in accordance with the provisions of the Act.

Company records

The following are records pertaining to IWCP Group and/or Liberty's own affairs:

Finance and accounting records

- Human Resources;
- Strategy;
- Shareholders;
- Intermediaries;

Operational records;

- Technology;
- Compliance and Risk;
- Subsidiary;
- Contractors; and
- Directors

Types of personal information held by IWCP Group and/or Liberty

Categories of data subjects	Categories of information held
Customers including policy holders / investors/ beneficiaries / trustees / life assured / claimants / guardians	<p>Includes relevant personal information or special personal information as defined by the Protection of Personal Information Act, No. 04 of 2013, such as name, South African identity number or other identifying number (e.g. passport), date of birth, citizenship, telephone number(s), email address(es), income tax numbers, physical and postal addresses, financial information (e.g. fund or portfolio details), banking information (including account numbers), health information.</p> <p>For juristic persons: entity name, registration number, income tax number, tax information, contact details for representative persons.</p> <p>FICA documentation used to verify identity and details of customer</p>
Advisers / brokers/ Liberty entrepreneurs' executors / agents of executors /	<p>Includes licence numbers, physical addresses, contact details, compliance officer details.</p>
Directors	<p>ID numbers, name, financial information as required for statutory reporting</p>
Employees	<p>Includes ID number, contact details, physical and postal address, date of birth, age, marital status, race, disability information, employment history, criminal / background checks, fingerprints, CVs, education history, banking details, income tax reference number, remuneration and benefit information (including medical aid, pension / provident fund information), details related to employee performance, disciplinary procedures</p> <p><i>"Employee" refers to any person who works for or provides services to or on behalf of Liberty and receives or is entitled to receive any remuneration and any other person who assists in carrying out or conducting any work or services for Liberty. This includes, without limitation, heads of departments, managers, all permanent, temporary and part-time staff as well as contract workers.</i></p>
Consultants / contractors	<p>Dependent on the nature of the consultant or contractor, but may include any details under "Employees" or "Service Providers" categories</p>
Service Providers, including outsourced / hosted services, auditors	<p>Includes company registration details, income tax and VAT registration details, BEE certificates, payment details including bank accounts, invoices, contractual agreements, addresses, contact details, any records a third party has provided to IWCP Group and/or Liberty; and Records generated by or within IWCP Group and/or Liberty pertaining to work or services, including transactional records.</p>

Other Parties

Records are kept in respect of other parties, including without limitation contractors, suppliers, departments, service providers. Alternatively, such other parties may possess records which can be said to belong to IWCP Group and/or Liberty. The following records fall under this category:

- Employee, work or service-related records which are held by another party as opposed to being held by IWCP Group and/or Liberty; and
- Records held by IWCP Group and/or Liberty pertaining to other parties, including financial records, correspondence, contractual records, records provided by the other party, and records third parties have provided about the contractors/suppliers.

Publicly available records

We set out the records which are already publicly available without a request for access in terms of the Act being necessary:

- Group annual financial statements; and
- Group interim audited report.

Records available in accordance with other legislation

- Long-Term Insurance Act 52 of 1998
- Pension Funds Act 24 of 1956
- Medical Schemes Act 131 of 1998
- Collective Investments Schemes Control act 45 of 2002
- Companies Act 61 of 1973
- Skills Development Levies Act 66 of 1995
- Financial Intelligence Centre Act 38 of 2001
- Labour Relations Act 66 of 1995
- Basic Conditions of Employment Act 75 of 1997
- Employment Equity Act 55 of 1998
- Prevention of Organised Crime 121 of 1998
- Income Tax Act 58 of 1962
- Financial Advisory and Intermediary Services Act 37 of 2002
- Value Added Tax 89 of 1991
- Unemployment Insurance Act 63 of 2001
- Compensation for Occupational Injuries and Diseases Act 130 of 1993

STEPS TO CONSIDER BEFORE SUBMITTING A REQUEST

The following steps must be considered before submitting a request:

Step 1: Are you requesting your own information?

All IWCP Group and/or Liberty clients are allowed access to their **own information** without having to use the request for access to information procedures as set out in the Promotion of Access to Information Act, including, but not limited to:

- Policy documents
- Account information
- Personal Records
- Voice recordings

All IWCP Group and/or Liberty clients should contact the relevant call centre or their financial adviser to request access to their **own information**. Please note that there may be administration costs associated with retrieval of certain types of information records.

Step 2: Are you entitled to use the Act to request access?

Please take note of section 7(1) of the Act which states:

“This Act does not apply to a record of a public body or a private body if:

- a) that record is requested for the purpose of criminal or civil proceedings;
- b) so requested after the commencement of such criminal or civil proceedings, as the case may be; and
- c) the production of or access to that record for the purpose referred to in paragraph
- d) is provided for in any other law.”

If section 7(1) applies, you may not bring a request in terms of this Act. You must use the rules and procedures for discovery of information of the relevant legal forum and proceedings you are involved in. IWCP Group and/or Liberty reserve the right to claim all expenses and other damages incurred as a result of a requester submitting a request in contravention of section 7(1).

Step 3: Does the information requested exist in the form of a record?

Please note that the Act only applies to records that are in existence at the time of us receiving your request. The Act does not compel anyone to create a record which is not yet in existence at the time the request is made. For instance, the Act cannot be used to obtain reasons for a decision taken by IWCP Group and/or Liberty if such reasons are not in the form of a record.

Step 4: Is the record in the possession or under the control of IWCP Group and/or Liberty?

The Act provides that the record requested must be in our possession or under our control. Therefore, even if a record was created by IWCP Group and/or Liberty or at some point in IWCP Group and /or Liberty’s possession (but no longer in IWCP Group and/or Liberty’s control at the time



of your request), you must seek access to the record from the party under whose possession or control it is.

HOW TO SUBMIT REQUEST FOR ACCESS

Please consider the steps in paragraph 7 above before submitting your request. Once you are satisfied that none of the foregoing prohibitions apply to you, you may proceed to submit a request as follows:

Request form

Please complete the request form in **ANNEXURE 1**:to this Manual (the “Request Form”). You can send the completed request form as is or under cover of a separate letterhead,

In the Request Form, you need to provide sufficient information to enable us to adequately identify:

- The record or records requested;
- The identity of the requester,
- Which form of access is required, if the request is granted;
- The postal address or email address of the requester.

Description of the right

Take care to adequately describe the right which you are seeking to protect or enforce by means of the records requested. Please note that the courts have indicated that access to the records must be “necessary” for the exercise or protection of the right so stated.

It is important to note that Liberty may refuse you access to the records requested if the right is not clearly defined or where the right you claim to seek to exercise or protect does not qualify as a right as contemplated in the Act.

Representatives

If a request is made on behalf of another person, then the requester must submit proof of the capacity in which the requester is making the request to the reasonable satisfaction of IWCP Group and/or Liberty.

Illiteracy or disability

If an individual is unable to complete the prescribed form because of illiteracy or disability, such a person may make the request orally.

Prescribed fees

- a) The prescribed fees, where applicable, as provided for in paragraph 9.2 below must be paid and proof of payment (e.g. copy of deposit slip) must be submitted following your request.
- b) The requester will be notified where the Information Officer requires a deposit (calculated from the access fee).
- c) You must submit proof of payment before your request can be processed.
- d) If you qualify for exemption of the payment of any fee, please state the reason for exemption.

PRESCRIBED FEES

The Act provides for two types of fees, namely:

- A request fee, which will be a standard fee; and
- An access fee, which must be calculated by taking into account reproduction costs, search and preparation time and cost, as well as postal costs.

The requester, other than a *personal requester**, must pay the prescribed R50.00 (fifty rand) request fee, following submission of the request and provide a deposit slip as proof of payment which must follow the Request Form.

** “personal requester” means a requester seeking access to a record containing personal information** about the requester.*

*** “personal information” means information about an identifiable individual, including, but not limited to—*

- (a) information relating to the race, gender, sex, pregnancy, marital status, national, ethnic or social origin, colour, sexual orientation, age, physical or mental health, well-being, disability, religion, conscience, belief, culture, language and birth of the individual;*
- (b) information relating to the education or the medical, criminal or employment history of the individual or information relating to financial transactions in which the individual has been involved;*
- (c) any identifying number, symbol or other particular assigned to the individual;*
- (d) the address, fingerprints or blood type of the individual;*
- (e) the personal opinions, views or preferences of the individual, except where they are about another individual or about a proposal for a grant, an award or a prize to be made to another individual;*
- (f) correspondence sent by the individual that is implicitly or explicitly of a private or confidential nature or further correspondence that would reveal the contents of the original correspondence;*
- (g) the views or opinions of another individual about the individual;*
- (h) the views or opinions of another individual about a proposal for a grant, an award or a prize to be made to the individual, but excluding the name of the other individual where it appears with the views or opinions of the other individual; and*
- (i) the name of the individual where it appears with other personal information relating to the individual or where the disclosure of the name itself would reveal information about the individual,*
- (j) but excludes information about an individual who has been dead for more than 20 years.*

If the search for and preparation of the record (for disclosure), including arrangement to make it available in the requested form, requires more than the hours prescribed in the regulations for this purpose, IWCP Group and/or Liberty will request you to pay as a deposit the prescribed portion of the access fee which would be payable if the request is granted.

IWCP Group and/or Liberty may withhold a record until the requester has paid the fees as indicated in **Annexure 2**.

A requester whose request has been granted must pay the applicable access fee for reproduction and for search and preparation, and for any time reasonably required in excess of the prescribed hours to search for and prepare the record for disclosure including making arrangements to make it available in the request form.

You may ask for a refund of the deposit if your request for access is refused.



CONSIDERING YOUR REQUEST

- 1 IWCP Group and/or Liberty will have deemed to have received your request when all the requirements in respect of the Act have been met.
- 2 Subject to the provisions in the Act in respect of extension of time periods, IWCP Group and/or Liberty will process the request within 30 days, unless you have stated special reasons which would satisfy IWCP Group and/or Liberty that circumstances dictate that the above time periods not be complied with.
- 3 You will be informed in writing whether access has been granted or denied.
- 4 The main grounds for IWCP Group and/or Liberty to refuse a request for information relate to the:
 - a. mandatory protection of the privacy of a third party who is a natural person, which would involve the unreasonable disclosure of personal information of that natural person;
 - b. mandatory protection of the commercial information of a third party, if the record contains:
 - i. trade secrets of that third party;
 - ii. financial, commercial, scientific or technical information which disclosure could likely cause harm to the financial or commercial interests of that third party; and
 - iii. information disclosed in confidence by a third party to IWCP Group and/or Liberty, if the disclosure could place that third party at a disadvantage in negotiations or commercial competition;
 - c. mandatory protection of confidential information of third parties if it is protected in terms of any agreement;
 - d. mandatory protection of the safety of individuals and the protection of property;
 - e. mandatory protection of records which would be regarded as privileged in legal proceedings;
 - f. the commercial activities of IWCP Group and/or Liberty, which may include:
 - i. trade secrets of IWCP Group and/or Liberty;
 - ii. financial, commercial, scientific or technical information which disclosure could likely cause harm to the financial or commercial interests of IWCP Group and/or Liberty; and
 - iii. information which, if disclosed could put IWCP Group and/or Liberty at a disadvantage in negotiations or commercial competition;
 - iv. a computer program which is owned by IWCP Group and/or Liberty, and which is protected by copyright; and
 - v. the research information of IWCP Group and/or Liberty or a third party, if its disclosure would disclose the identity of IWCP Group and/or Liberty, the researcher or the subject matter of the research and would place the research at a serious disadvantage.



YOUR REMEDIES

IWCP Group and/or Liberty do not have internal appeal procedures. As such, the decision made by the IWCP Group Information officer or Liberty Group Privacy Officer is final. If your request is denied, you are entitled to apply to a court with appropriate jurisdiction for relief.

ANNEXURE 1:

REQUEST FOR ACCESS TO RECORDS OF PRIVATE BODY

1. Particulars of IWCP Group

This annexure must accompany the cover letter addressed to the Information Officer

Information Officer
4 Kikuyu Road
Sunninghill 2157
Tel: +011 678 8904
E-mail: info@iwcp.co.za

2. Particulars of person requesting access to the record

- (a) The particulars of the person who requests access to the record must be given below.
- (b) The address in the Republic or the email address to which the information is to be sent must be given.
- (c) Proof of the capacity in which the request is made, if applicable, must be attached.

Full names and surname:

Identity number: _____

Postal address:

Cell / Telephone number: _____

E-mail address: _____

Capacity in which the request is made, when made on behalf of another person:

3. Particulars of person on whose behalf request is made

(a) 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.

(b) If the provided space is inadequate, please continue on a separate folio and attach it to this form. The requester must sign all the additional folios.

Full names and surname:

Identity number: _____

4. Particulars of record

(c) 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.

(d) If the provided space is inadequate, please continue on a separate folio and attach it to this form. The requester must sign all the additional folios.

1. Description of record or relevant part of the record:

2. Reference number, if available:

3. Any further particulars of record:

4. Fees

- (e) A request for access to a record, other than a record containing personal information about yourself, will be processed only after a request fee has been paid.
- (f) There are two types of fees:
- **Request fee:** R50
 - **Access fee:** 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. This is calculated by taking into account reproduction costs, search and preparation costs, as well as postal costs. These fees are set out in Annexure 2.
- (g) The requester will be notified where the Information Officer requires a deposit (calculated from the access fee). Where a deposit has been taken and the request has subsequently been refused, the Information Officer will refund the deposit to the requester.
- (h) Please ensure that you use the following reference for your deposit or we will not be able to identify it as belonging to you:**
- **“PAIA” followed by your initial(s) and surname (e.g. If your initials and surname is AN Smith, you must use PAIA AN Smith as your reference.**
 - You must submit proof of payment before your request can be processed.
- (i) If you qualify for exemption of the payment of any fee, please state the reason for exemption.

Reason for exemption from payment of fees:

5. Form of access to record

If you are prevented by a disability to read, view or listen to the record in the form of access provided for in 1 to 4 hereunder, state your disability and indicate in which form the record is required.	
Disability: Form in which record is required:	Form in which record is required
Mark the appropriate box with an X.	
NOTES:	
(a) Compliance with your request in the specified form may depend on the form in which the record is available.	
(b) Access in the form requested may be refused in certain circumstances. In such a case you will be informed if access will be granted in another form.	
(c) The fee payable for access for the record, if any, will be determined partly by the form in which access is requested.	
1. If the record is in written or printed form:	
<input type="checkbox"/> copy of record*	<input type="checkbox"/> inspection of record
2. If record consists of visual images: this includes photographs, slides, video recordings, computer-generated images, sketches, etc	
<input type="checkbox"/> view the images	<input type="checkbox"/> copy of the images
<input type="checkbox"/> transcription of images*	<input type="checkbox"/>
3. If record consists of recorded words or information which can be reproduced in sound:	
<input type="checkbox"/> listen to the soundtrack audio cassette	<input type="checkbox"/> transcription of soundtrack* written or printed document

4. If record is held on computer or in an electronic or machine-readable form:			
	printed copy of record*	Printed copy of information derived from the record	copy in computer readable form* - flash drive
If you requested a copy or transcription of a record (above), do you wish the copy or transcription to be posted to you? Postage is payable			Yes No

6. Particulars of right to be exercised or protected

If the provided space is inadequate, please continue on a separate folio and attach it to this form. The requester must sign all the additional folios.

1. Indicate which right is to be exercised or protected:

2. Explain why the record requested is required for the exercise or protection of the aforementioned right:



7. Notice of decision regarding request for access

You will be notified in writing whether your request has been approved/denied. If you wish to be informed in another manner, please specify the manner and provide the necessary particulars to enable compliance with your request.

- 1. How would you prefer to be informed of the decision regarding your request for access to the record?

Signed at _____ this _____ day of _____ 20__

Signature of requester / person on whose behalf request is made

FOR IWCP INTERNAL USE ONLY

Reference number:

Information Officer:

Request fee (if any): R

Deposit (if any): R

Access fee: R

SIGNATURE OF INFORMATION OFFICER (or duly authorised representative)

ANNEXURE 2:

FEES IN RESPECT OF PRIVATE BODIES

DESCRIPTION		Rand
1)	The fee for a copy of the manual as contemplated in regulation 9(2)(c) -for every photocopy of an A4-size page or part thereof.	1,10
2)	The fees for reproduction referred to in regulation 11 (1) are as follows:	
a)	For every photocopy of an A4-size page or part thereof	1,10
b)	For every printed copy of an A4-size page or part thereof held on a computer or in electronic or machine-readable form	0,75
c)	For a copy in a computer-readable form on—	
i)	Stiffy disc	7,50
ii)	Compact disc	70,00
d)	For a transcription of visual images, for an A4-size page or part thereof	40,00
e)	For a copy of visual images	60,00
f)	For a transcription of an audio record, for an A4-size page or part thereof	20,00
g)	For a copy of an audio record	30,00
3)	The request fee payable by a requester, other than a personal requester, referred to in regulation 11(2)	50,00
4)	The access fees payable by a requester referred to in regulation 11 (3) are as follows:	
a)	For every photocopy of an A4-size page or part thereof	1,10
b)	For every printed copy of an A4-size page or part thereof held on a computer or in electronic or machine-readable form	0,75
c)	For a copy in a computer-readable form on—	
i)	Stiffy disc	7,50
ii)	Compact disc	70,00
d)	For a transcription of visual images, for an A4-size page or part thereof	40,00
i)	For a copy of visual images	60,00
e)	For a transcription of an audio record, for an A4-size page or part thereof	20,00
i)	For a copy of an audio record	30,00
f)	To search for and prepare the record for disclosure, R30.00 for each hour or part of an hour, excluding the first hour, reasonably required for such search and preparation.	
g)	For purposes of section 54 (2) of the Act, the following applies:	
i)	Six hours as the hours to be exceeded before a deposit is payable; and	
ii)	One third of the access fee is payable as a deposit by the requester.	
h)	The actual postage is payable when a copy of a record must be posted to a requester.	



ANNEXURE 3:

IWCP Group – BASIC INFORMATION

Physical Address

4 Kikuyu Road
Sunninghill
2157

Other Contact Details:

Phone: (011) 678 8904
E-mail: info@iwcp.co.za
Website: www.iwcp.co.za