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PAIA Manual (Section 51 Statutory Manual)	Frequency of Review	Annually
	Related Governance Documents	<ul style="list-style-type: none"> • Promotion of Access to Information Act, 2000 • Protection of Personal Information Act, 2013
	Effective Date	1 January 2010

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Introduction

- The aim of the manual is to assist potential requestors as to the procedure to be followed when requesting access to information or documents from Lombard Insurance Co. Limited as contemplated in terms of the Act. The manual may be amended from time-to-time and as soon as any amendments have been finalised, the latest version of the manual will be made public. Any requestor is advised to contact:

Peter James Orford

should he or she require any assistance in respect of the utilisation of this manual and/or the requesting of information or documents from Lombard Insurance Co. Limited.

Purpose of the Manual

- This manual is intended to foster and proclaim Lombard Insurance Co. Limited's commitment to fostering a culture of transparency and accountability within the organisation as a whole, by giving effect to the right to access information that is required for the exercise or protection of any right and actively promote a society in which the people of South Africa have effective access to information to enable them to more fully exercise and protect their rights.
- To promote the effective governance of all private institutions, Lombard Insurance Co. Limited recognises the fundamental requirement that all the people of South Africa be empowered and educated to understand their rights in terms of this Act for them to exercise their rights in relation to all institutions, whether those institutions are of a private or public nature.

Definitions and Interpretations

- The following words will bear the following meaning in this manual:
 - The "Act" shall mean the Promotion of Access to information Act 2000, together with all relevant regulations published.
 - "the/this manual" shall mean this manual together with all annexures thereto as available at the offices of Lombard Insurance Co. Limited from time-to-time.
 - "Lombard" shall mean Lombard Insurance Company Limited with registration number 1990/001253/06, a non-life insurance business.
 - "Information Officer" means the person has been appointed as the Information Officer of in accordance with the Promotion of Access to Information Act, 2000 (hereinafter referred to as PAIA).
 - "Information Regulator" means the Information Regulator established in terms of Section 39 of the Protection of Personal Information Act, 2013.

Contact Details (Section 51(1)(a) of the Act)

- Name of body: Lombard Insurance Company Limited
- Chief Executive Officer: Peter James Orford
- Appointed Information Officer: Peter James Orford
- Appointed Deputy Information Officer: Dominic Parry
- Address: 4th Floor
22 Wellington Road
Parktown

Johannesburg

2193

- Telephone: (011) 551 - 0600
- Fax: (011) 551 – 0603
- E-mail: **Appointed Information Officer:** jameso@lombardins.com

Deputy Information Officer: dominicp@lombardins.com

- Website address: www.lombardins.com

Guide in terms of Section 10 of the PAIA

(Section 51(1)(b)(i) of the Act)

- In terms of Section 10 of the Act, a guide compiled by the South African Human Rights Commission and as updated by the Information Regulator containing such information as may be required by a person who wishes to exercise any right contemplated in the Act.
- The guide is available and obtainable from the Information Regulator.
- Contact details of the Information Regulator are as follows:

Physical Address: JD House, 27
Siemens Street
Braamfontein
Johannesburg
2001

Postal Address: P.O Box 31533
Braamfontein
Johannesburg
2017

Website: <https://inforegulator.org.za>
E-mail: PAIACompliance@inforegulator.org.za

Notice(s) in terms of Section 52(2) of the Act

(Section 51(1)(b)(ii) of the Act)

- The categories of records held by **Lombard** that are automatically available without a person having to request access in terms of this Act, including such categories of records which are available:
 - for inspection in terms of legislation other than this Act;
 - for purchase or copying from the private body;
 - from the private body free of charge; and
 - how to obtain access to such records.are set out below.

Information/documents available in accordance with legislation

(Section 51(1)(b)(iii) of the Act)

- Lombard keeps information/documents in accordance with the following legislation (as may and applicable) (please note that this is not an exhaustive list):

Corporate & Financial Institution Governance Legislations	
	Companies Act, Nr. 71 of 2008
Financial Services Related Information	
	Insurance Act, 2017
	Short-Term Insurance Act, 1998
	Financial Advisory and Intermediaries Act; 2004
Tax related Legislation	
	Income Tax Act 58 of 1962
	Value-Added Tax Act 89 of 1991
Labour Protection Legislation	
	Labour Relations Act 66 of 1995
	Section 31 of the Basic Conditions on Employments Act, Nr. 75 of 1997.
	Skills Development Act, Nr. 97 of 1998
	Unemployment Insurance Act, Nr. 63 of 2001
	Occupation Health & Safety Act 85 of 1993

Equality related legislation	
	Employment Equity Act 55 of 1998
	Broad-Based Black Economic Empowerment Act 53 of 2003
	Constitution of South Africa 108 of 1996

- The above records, in so far as it being of a public nature are available automatically without a person having to request access thereto in terms of the Act, as envisaged in Section 52.

Documents/information held by Lombard Limited in terms of the Act

(Section 51(1)(b)(iv) of the Act)

- Lombard holds the information/documents listed herein below:
 - Details relating to the operational, commercial and financial interests of Lombard:
 - ✓ Commercial contracts.
 - ✓ Client database (personal information of clients, commercial and financial information, information on agreements, proposals and intellectual property of such clients):
 - ✓ Personnel Report:
 - Standard Employment Contracts
 - Human Resources (personal information of past, present and prospective employees and partners/directors):
 - ✓ Insurance policies:
 - Records required in terms of the Policyholder Protection Rules.
 - ✓ **Lombard's** website address is www.lombardins.com and it is accessible to anyone with access to the internet. It contains a profile on **Lombard**, its contact particulars, services rendered and field of expertise.
 - ✓ It is recorded that all documents/information requested to the aforesaid shall only be made available to a requestor subject to the provisions of the Act.
 - ✓ A request for information should be in the prescribed form, addressed to the Information Officer and submitted against payment of the prescribed fee.
 - ✓ Lombard has compiled a schedule of the types of information it holds and categories as to the circumstances under which this access to this information may be given.

Sources of Personal Information collected by Lombard:

(Section 51(1)(c)(ii) of the Act)

- Lombard collects personal information directly and/or indirectly from the following data subjects:
 - Prospective clients who enquire about our financial services.
 - Clients who have appointed a broker for their insurance purposes.
 - Policyholders who enter a policy via any of our FSP's with whom we have binder and/or intermediary agreements with.
 - Any other insurance purposes that Lombard may require the information for.
- Personal information is most usually collected directly from the data subjects through the completion of a needs analysis done by the intermediary, application form and/or any other information that is for the purpose of insurance and to enable Lombard to act as an insurer.
- Lombard may also collect personal information about from other sources such as external third parties.

Purpose for processing information by Lombard

(Section 51(1)(c)(i) of the Act)

- Lombard collects, holds, uses, and discloses personal information mainly to provide clients with access to its financial services and products. Lombard will only process personal information for a purpose that would be reasonably be expected, including:
 - Complying with the obligations contained in the contract concluded between Lombard and its clients.
 - Providing clients or prospective clients with advice, products and services which suits their needs.
 - Verifying the clients' identity and to conduct credit reference checks.
 - Issuing, administering, and managing clients' insurance policies.
 - Processing insurance claims and taking recovery action when necessary.
 - Notifying clients of new products or developments that may be of interest to them.
 - Confirming, verifying, and updating clients' details.
 - Complying with all legal and regulatory requirements.
- Some of the personal information that we hold may include, clients' first and last name, email address, home, postal or other physical address, other contact information, birth date, gender, occupation, qualifications, past employment, residency status, assets, liabilities, insurance, income, expenditure, family history, medical information, and banking details.

Third parties who may have access to personal information held by Lombard Limited

(Section 51(1)(c)(iii) of the Act)

- Lombard may be required to share clients' personal information with third parties. Where this information is shared, Lombard will take all precautions to ensure that the third-party will treat this information with the same level of protection as required of Lombard.
- These third-parties may include:
 - The Compliance Officer of Lombard (where applicable).
 - Analytics and search engine providers assisting in the enhancement of our websites.
 - Information Technology specialists assisting us with data storage, security, processing, analytics, etc.
 - Auditors of Lombard.
 - Regulatory or governmental authorities such as the Financial Sector Conduct Authority and the Prudential Authority.

The Transfer of Personal Information outside of the Republic of South Africa

(Section 51(1)(c)(iv) of the Act)

- Clients' personal information may be hosted on servers managed by a third-party service provider, which may be located outside of South Africa. Furthermore, to the degree any information is required to be provided to an international reinsurer, all such reinsurers have regulation like the data protection regulations of South Africa.

Information Security Measures

(Section 51(1)(c)(v) of the Act)

- The following policy statements will apply to all data-management initiatives undertaken at Lombard:
 - wherever possible, data should be collected once only, at the source, and made available to all who have a legitimate business need for the data.
 - processes for data capture, validation and processing should be automated wherever possible.
 - data should be collected only when known and documented uses and value of this data exist.
 - collection of accurate and complete data is expected, even when elements of this data are required by a business unit different to the unit capturing the data.
 - for accountability and stewardship, all data must have a defined Data Owner and Data Steward responsible for the accuracy, integrity and security of data.
 - data must be used only by those persons duly authorised to access and use the data by virtue of their functional role and position at Lombard, and only for the purpose for which use has been authorised; authorisation for access to data is not transferable.
 - every data user must recognise that data and the information derived from it are potentially complex; it is the responsibility of every data user to understand the data that they use, and to guard against making misinformed or incorrect interpretations of data or misrepresentations of information.
 - data users must carry out all tasks related to the creation, storage and retrieval, maintenance, cataloguing, use, dissemination and disposal of institutional data responsibly, in a timely manner and with the utmost care.
 - data users must not knowingly falsify data, delete data that should not be deleted or reproduce data that should not be reproduced.
 - data users must respect the privacy of individuals whose records they may access; no subsequent disclosure of personal information contained in files or databases may be made, where disclosure is understood to include (but is not limited to) verbal references or inferences, correspondence, memoranda and sharing of electronic files.
 - wherever possible Lombard should avoid maintaining redundant and duplicate data in multiple systems.
 - data may only be deleted or destroyed in such a manner and timeframe as stated in applicable legislation in relation to prescribed retention periods.
 - data should be readily accessible in electronic form to authorised users to view, query or update.
 - data must be stored in such a way as to ensure that the data is secure, and that access is limited to authorised users; secure storage of Lombard's data assets is the joint responsibility of system and network administrators, database designers, application designers, and the data users who must all ensure that passwords and other security mechanisms are used; and
 - all external vendors requiring access to Lombard data must sign a Non-Disclosure Agreement (NDA) before access to any data is granted; in conjunction with the NDA, for purposes of external processing of data, the parties would need to enter into a formal Service Level Agreement (SLA) or Outsourcing arrangement.
- In line with the overarching Data Management policy, personal information will be used only by those persons duly authorised to access and use the information by virtue of their position at Lombard, and only for the purpose for which use has been authorised. Authorisation for access to information is not transferable. As part of Lombard's Data Governance function, data access matrices are created detailing the level of access required by each role in the business.

- All employees and personnel that have access to organizational computer systems or business data stored in cloud services must adhere to the password policies defined below to protect the security of the network, devices and protect data integrity. Cloud computing services encompass any infrastructure, application or service that is accessed via the internet. Examples include Office 365, Dropbox or Microsoft Azure.
- All Notebook computers issued by Lombard will be fully encrypted using disk-based encryption

Availability of the Manual

(Section 51(3) of the Act)

- This manual is available for inspection at the offices of Lombard, free of charge.
- Copies of the manual may be obtained, subject to the prescribed fees, at the offices of Lombard Insurance Co. Limited

Annexure A – Records held by Lombard Insurance Company Limited

Organization Record Classification Key

Classification No	Access	Classification
1	May be disclosed	Public Access Document
2	May be disclosed	Subject to Copyright
3	Limited disclosure	Personal information of the requester of the information
4	May not be disclosed	Unreasonable disclosure of personal information
5	May not be disclosed	Request after commencement of criminal proceedings
6	May not be disclosed	Would breach duty of confidence owed to a third party
7	May not be disclosed	Could harm the commercial or financial interests of a third party
8	May not be disclosed	Could harm the organisation or third party in contract or other negotiations
9	May not be disclosed	Could compromise the safety of individuals or protection of property
10	May not be disclosed	Legally privileged document
11	May not be disclosed	Commercial information of Lombard Insurance Company Limited

Organizational Records

Area	Subject	Classification
Websites	<ul style="list-style-type: none"> Organisational and divisional profiles News and publications Organisational Structure 	2
Communication	<ul style="list-style-type: none"> Public Product Information Media Releases Promotion of Access to Information Act Manual 	2
Human Resources	<ul style="list-style-type: none"> Staff Records Employment Contracts Policies and Procedures 	3,4,10,11 (dependent on the nature of the

	<ul style="list-style-type: none"> Information Pertaining to Staff Benefits 	information requested)
Corporate Records	<ul style="list-style-type: none"> Notice of incorporation (registration certificate) Memorandum of incorporation and alterations or amendments Record of directors and past directors Minutes and resolutions of directors' meetings, audit committee and directors' committees Securities register 	3,4,10,11 (dependent on the nature of the information requested)
Financial Information	<ul style="list-style-type: none"> Financial Statements Financial and Tax Records (Organisational and Employee) Asset Register 	11
Governance	<ul style="list-style-type: none"> General Governance Policies Risk Management Policies Compliance Policies 	11
Actuarial Information	<ul style="list-style-type: none"> Information relating to Capital Model 	11
Market Conduct Information	<ul style="list-style-type: none"> Registers of Key Individuals and FAIS Representatives etc. A Register of complaints received directly from clients 	3,4,10 (dependent on the nature of the information requested)
Legal Records	<ul style="list-style-type: none"> Statutory Records Agreements and Contracts 	2,6,7,8,11 (dependent on the nature of the information requested)
Operational Records	<ul style="list-style-type: none"> Policy Documents Sales Records Security Records Internal Communications Records Supplier Records 	2,3,6,7,8,11 (dependent on the nature of the information requested)

Annexure “B”: Forms 2 and 3 – Request for Information from Private Body and Outcome of Request of Fees Payable.

FORM 2

REQUEST FOR ACCESS TO RECORD

[Regulation 7]

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)

E-mail address:

Fax number:

Mark with an "X"

Request is made in my own name

Request is made on behalf of another person.

PERSONAL INFORMATION			
Full Names			
Identity Number			
Capacity in which request is made <i>(when made on behalf of another person)</i>			
Postal Address			
Street Address			
E-mail Address			
Contact Numbers	Tel. (B):		Facsimile: <input type="text"/>
	Cellular:		
Full names of person on whose behalf request is made <i>(if applicable):</i>			
Identity Number			
Postal Address			

Street Address			
E-mail Address			
Contact Numbers	Tel. (B)		Facsimile
	Cellular		
PARTICULARS OF RECORD REQUESTED			
<i>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.)</i>			
Description of record or relevant part of the record:			
Reference number, if available			
Any further particulars of record			
TYPE OF RECORD <i>(Mark the applicable box with an "X")</i>			
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 (including copies of any virtual images, transcriptions and information held on computer or in an electronic or machine-readable form)	
Written or printed transcription of virtual images (this includes photographs, slides, video recordings, computer-generated images, sketches, etc)	
Transcription of soundtrack (written or printed document)	
Copy of record on flash drive (including virtual images and soundtracks)	
Copy of record on compact disc drive (including virtual images and soundtracks)	
Copy of record saved on cloud storage server	

MANNER OF ACCESS
(Mark the applicable box with an "X")

Personal inspection of record at registered address of public/private body (including listening to recorded words, information which can be reproduced in sound, or information held on computer or in an electronic or machine-readable form)	
Postal services to postal address	
Postal services to street address	
Courier service to street address	
Facsimile of information in written or printed format (including transcriptions)	
E-mail of information (including soundtracks if possible)	
Cloud share/file transfer	
Preferred language (Note that if the record is not available in the language you prefer, access may be granted in the language in which the record is available)	

PARTICULARS OF RIGHT TO BE EXERCISED OR PROTECTED

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

Indicate which right is to be exercised or protected	

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

FEEES	
a)	<i>A request fee must be paid before the request will be considered.</i>
b)	<i>You will be notified of the amount of the access fee to be paid.</i>
c)	<i>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.</i>
d)	<i>If you qualify for exemption of the payment of any fee, please state the reason for exemption</i>
Reason	

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	Facsimile	Electronic communication <i>(Please specify)</i>

Signed at _____ this _____ day of _____ 20 _____

Signature of Requester / person on whose behalf request is made

FOR OFFICIAL USE

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

FORM 3
OUTCOME OF REQUEST AND OF FEES PAYABLE
 [Regulation 8]

Note:

1. If your request is granted the—
 - (a) amount of the deposit, (if any), is payable before your request is processed; and
 - (b) requested record/portion of the record will only be released once proof of full payment is received.
2. Please use the reference number hereunder in all future correspondence.

Reference number: _____

TO: _____

Your request dated _____, refers.

1. 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>) is free of charge. 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 prescribed in Annexure B.	
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OR

2. You requested:

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 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 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	

3. To be submitted:

Postal services to postal address	
Postal services to street address	
Courier service to street address	
Facsimile of information in written or printed format (<i>including transcriptions</i>)	
E-mail of information (<i>including soundtracks if possible</i>)	
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>	

Kindly note that your request has been:

Approved

Denied, for the following reasons:

--

4. Fees payable with regards 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:			
(i) Flash drive	R40.00		
• To be provided by requestor			
(ii) Compact disc	R40.00		
• If provided by requestor			
• If provided to the requestor	R60.00		
For a transcription of visual images per A4-size page	Service to be outsourced. Will depend on the quotation of the service provider		
Copy of visual images			
Transcription of an audio record, per A4-size	R24.00		
Copy of an audio record			
(i) Flash drive	R40.00		
• To be provided by requestor			
(ii) Compact disc	R40.00		
• If provided by requestor			
• If provided to the requestor	R60.00		
Postage, e-mail or any other electronic transfer:	Actual costs		
TOTAL:			

5. Deposit payable (if search exceeds six hours):

Yes

No

Hours of search	Amount of deposit (calculated on one third of total amount per request)

The amount must be paid into the following Bank account:

Name of Bank: _____
 Name of account holder: _____
 Type of account: _____
 Account number: _____
 Branch Code: _____
 Reference Nr: _____
 Submit proof of payment to: _____

Signed at _____ this _____ day of _____ 20 _____

 Information officer