



**AIG SOUTH AFRICA LIMITED**

# **PAIA MANUAL**

**Prepared in terms of Section 51 of the Promotion of Access to  
Information Act, 2 of 2000 (as Amended)**

**DATE OF COMPILATION : 27/11/2013**  
**DATE OF LAST REVISION : 23/02/2024**

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## 1. LIST OF ACRONYMS AND ABBREVIATIONS

1.1	<b>“IO”</b>	Information Officer
1.2	<b>“DIO”</b>	Deputy Information Officer
1.3	<b>“Minister”</b>	Minister of Justice and Correctional Services
1.4	<b>“PAIA”</b>	Promotion of Access to Information Act No. 2 of 2000 (as amended)
1.5	<b>“POPIA”</b>	Protection of Personal Information Act No.4 of 2013
1.6	<b>“Regulator”</b>	Information Regulator
1.7	<b>“Republic”</b>	Republic of South Africa
1.8	<b>“AIG South Africa”</b>	AIG South Africa Limited
1.9	<b>“Guide”</b>	Guide on how to use PAIA

## 2. INTRODUCTION

This Promotion of Access to Information Act “PAIA” Manual is in respect of AIG South Africa. AIG South Africa is registered and incorporated in the Republic, registration number 1962/003192/06. AIG South Africa is licensed to conduct Non-Life insurance business by the Prudential Authority and regulated by the Financial Sector Conduct Authority and Prudential Authority (FSP number 15805).

PAIA was enacted on 3 February 2000 and gives effect to the constitutional rights of access to information held by another person and that is required for the exercise or protection of any rights. If a public body is the requester, the public body must be acting in the public interest. If a request is made in terms of PAIA, the body to whom the request is made is obliged to release the information, except where PAIA provides that the information may or must not be released. Requests in terms of PAIA must be made in accordance with the prescribed procedures, at the rates provided.

## 3. PURPOSE OF PAIA MANUAL

This PAIA Manual is intended to ensure that AIG South Africa complies with PAIA and to foster a culture of transparency and accountability within AIG South Africa by giving effect to the right to information that is required for the exercise or protection of any right and to actively promote a society in which the people of the Republic have effective access to information to enable them to exercise and protect their rights.

PAIA gives effect to the constitutional right of any person’s 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.

This PAIA Manual is useful for the public to:

- Check the categories of records held by a body which are available without a person having to submit a formal PAIA request;
- Have a sufficient understanding of how to make a request for access to a record of the body, by providing a description of the subjects on which the body holds records and the categories of records held on each subject;
- Know the description of the records of the body which are available in accordance with any other legislation;
- Access all the relevant contact details of the IO and DIO who will assist the public with the records they intend to access;
- Know the description of the Guide on how to use PAIA, as updated by the Regulator and how to obtain access to it;
- Know if the body will process personal information, the purpose of processing of personal information and the description of the categories of data subjects and of the information or categories of information relating thereto;
- Know the description of the categories of data subjects and of the information or categories of information relating thereto;
- Know the recipients or categories of recipients to whom the personal information may be supplied;
- Know if the body has planned to transfer or process personal information outside the Republic and the recipients or categories of recipients to whom the personal information may be supplied; and
- Know whether the body has appropriate security measures to ensure the confidentiality, integrity and availability of the personal information which is to be processed.

#### 4. KEY CONTACT DETAILS FOR ACCESS TO INFORMATION OF AIG SOUTH AFRICA

##### Information Officer

Name: Paul Donovan  
Tel: +27 0860 111 601  
Email: [aig-sapersonaldata.africa@aig.com](mailto:aig-sapersonaldata.africa@aig.com)

##### Deputy Information Officer

Name: Logan Armogam  
Tel: +27 0860 111 601  
Email: [aig-sapersonaldata.africa@aig.com](mailto:aig-sapersonaldata.africa@aig.com)

##### Access to information General contacts

Email: [aig-sapersonaldata.africa@aig.com](mailto:aig-sapersonaldata.africa@aig.com)  
Tel: +27 0860 111 601  
Website: [www.aig.co.za](http://www.aig.co.za)

##### Addresses:

Postal Address: Sandown Mews (West), 88 Stella Street, 1st Floor  
Sandton  
Johannesburg, 2196  
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Sandton  
Johannesburg, 2196

## 5. GUIDE ON HOW TO USE PAIA AND HOW TO OBTAIN ACCESS TO THE GUIDE

- 5.1. 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.
- 5.2. The Guide is available in each of the official languages and in braille.
- 5.3. The aforesaid Guide contains the description of:
  - 5.3.1. the objects of PAIA and POPIA;
  - 5.3.2. the postal and street address, phone, and fax number and, if available, electronic mail address of:
    - 5.3.2.1. the IO of every public body and private body, and
    - 5.3.2.2. every DIO of every public and private body designated in terms of section 17(1) of PAIA<sup>1</sup> and section 56 of POPIA<sup>2</sup>;
  - 5.3.3. the manner and form of a request for:
    - 5.3.3.1. access to a record of a public body contemplated in section 11<sup>3</sup>; and
    - 5.3.3.2. access to a record of a private body contemplated in section 50<sup>4</sup>;
  - 5.3.4. the assistance available from the IO of a public body in terms of PAIA and POPIA;
  - 5.3.5. the assistance available from the Regulator in terms of PAIA and POPIA;
  - 5.3.6. all remedies in law available regarding an act or failure to act in respect of a right or duty conferred or imposed by PAIA and POPIA, including the manner of lodging:
    - 5.3.6.1. an internal appeal;
    - 5.3.6.2. a complaint to the Regulator; and
    - 5.3.6.3. an application with a court against a decision by the IO of a public body, a decision on internal appeal or a decision by the Regulator or a decision of the head of a private body;
  - 5.3.7. the provisions of sections 14<sup>5</sup> and 51<sup>6</sup> requiring a public body and private body, respectively, to compile a manual, and how to obtain access to a manual;

<sup>1</sup> Section 17(1) of PAIA- For the purposes of PAIA, each public body must, subject to legislation governing the employment of personnel of the public body concerned, designate such number of persons as deputy information officers as are necessary to render the public body as accessible as reasonably possible for requesters of its records.

<sup>2</sup> Section 56(a) of POPIA- Each public and private body must make provision, in the manner prescribed in section 17 of the Promotion of Access to Information Act, with the necessary changes, for the designation of such a number of persons, if any, as deputy information officers as is necessary to perform the duties and responsibilities as set out in section 55(1) of POPIA.

<sup>3</sup> Section 11(1) of PAIA- A requester must be given access to a record of a public body if that requester complies with all the procedural requirements in PAIA relating to a request for access to that record; and access to that record is not refused in terms of any ground for refusal contemplated in Chapter 4 of this Part.

<sup>4</sup> Section 50(1) of PAIA- A requester must be given access to any record of a private body if-

- a) that record is required for the exercise or protection of any rights;
- b) that person complies with the procedural requirements in PAIA relating to a request for access to that record; and
- c) access to that record is not refused in terms of any ground for refusal contemplated in Chapter 4 of this Part.

<sup>5</sup> Section 14(1) of PAIA- The information officer of a public body must, in at least three official languages, make available a manual containing information listed in paragraph 5 above.

<sup>6</sup> Section 51(1) of PAIA- The head of a private body must make available a manual containing the description of the information listed in paragraph 4 above.

- 5.3.8. the provisions of sections 15<sup>7</sup> and 52<sup>8</sup> providing for the voluntary disclosure of categories of records by a public body and private body, respectively;
- 5.3.9. the notices issued in terms of sections 22<sup>9</sup> and 54<sup>10</sup> regarding fees to be paid in relation to requests for access; and
- 5.3.10. the regulations made in terms of section 92<sup>11</sup>.
- 5.4. Members of the public can inspect or make copies of the Guide from the offices of the public and private bodies, including the office of the Regulator, during normal working hours.
- 5.5. The Guide can also be obtained:
- 5.5.1. upon request to the IO;
- 5.5.2. from the website of the Regulator (<https://www.inforegulator.org.za>).
- 5.6. A copy of the Guide is also available in the following two official languages, for public inspection during normal office hours:
- English and Sesotho

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<sup>7</sup> Section 15(1) of PAIA- The information officer of a public body, must make available in the prescribed manner a description of the categories of records of the public body that are automatically available without a person having to request access

<sup>8</sup> Section 52(1) of PAIA- The head of a private body may, on a voluntary basis, make available in the prescribed manner a description of the categories of records of the private body that are automatically available without a person having to request access

<sup>9</sup> Section 22(1) of PAIA- The information officer of a public body to whom a request for access is made, must by notice require the requester to pay the prescribed request fee (if any), before further processing the request.

<sup>10</sup> Section 54(1) of PAIA- The head of a private body to whom a request for access is made must by notice require the requester to pay the prescribed request fee (if any), before further processing the request.

<sup>11</sup> Section 92(1) of PAIA provides that –“The Minister may, by notice in the Gazette, make regulations regarding-

- (a) any matter which is required or permitted by this Act to be prescribed;
- (b) any matter relating to the fees contemplated in sections 22 and 54;
- (c) any notice required by this Act;
- (d) uniform criteria to be applied by the information officer of a public body when deciding which categories of records are to be made available in terms of section 15; and
- (e) any administrative or procedural matter necessary to give effect to the provisions of this Act.”

## 6. CATEGORIES OF RECORDS OF AIG SOUTH AFRICA WHICH ARE AVAILABLE WITHOUT A PERSON HAVING TO REQUEST ACCESS

Below are the categories of records held by AIG South Africa which are available without a person having to request access by completing [Form 2](#). These records are available on the website and a person may download or request telephonically or by sending an email or a letter.

Category of Records	Record Type	Available on Website	Available upon Request
AIG Policy Records	PAIA Manual	✓	✓
	Privacy Policy	✓	✓
	Conflicts of Interest Management Policy	✓	✓
	Cookie Policy	✓	✓
Marketing and Advertising	AIG Product Information	✓	✓
Claims	AIG Claim Forms	✓	✓

## 7. RECORDS OF AIG SOUTH AFRICA WHICH ARE AVAILABLE IN ACCORDANCE WITH ANY OTHER LEGISLATION

Category of Records	Applicable Legislation
<ul style="list-style-type: none"> <li>- Employee Identification and Contact Details (Name and Surname, Contact Number, Identity Number, Passport Number, Phone Number, Age, Address, Bank Account Details)</li> <li>- Family Records (Next of Kin Name and Surname, Contact Number)</li> <li>- Medical and Health Records</li> <li>- Professional History (Occupation, Qualification)</li> <li>- Demographic Details (Age, Income, Gender, Location)</li> <li>- Employee Benefit and Compensation Records (Compensation, Banking Details, SARS related Information)</li> </ul>	Basic Conditions of Employment Act



Category of Records	Applicable Legislation
<ul style="list-style-type: none"> <li>- Behavioral Data (Criminal Checks, Performance, Disciplinary)</li> <li>- Employee Pension Plan Records</li> <li>- Employee Leave of Absence Records</li> <li>- Employee Training Records</li> <li>- Employee Handbook (Staff Policies/Rules)</li> </ul>	Basic Conditions of Employment Act (cont.)
<ul style="list-style-type: none"> <li>- Skills Development Section on the Financial Services Council Report</li> <li>- BBBEE Status</li> <li>- BBBEE Status of Suppliers</li> <li>- Supplier Employee Information</li> <li>- Contractor and Supplier Agreements</li> <li>- List of Suppliers, Products, Services and Distributors</li> </ul>	Broad Based Black Economic Empowerment Act
<ul style="list-style-type: none"> <li>- Finance and Accounting</li> <li>- Company Secretarial</li> <li>- Actuarial</li> <li>- Claims</li> <li>- Assets</li> <li>- Contracts and Agreements</li> <li>- Internal Insurance</li> </ul>	Companies Act, 71 of 2008
<ul style="list-style-type: none"> <li>- Employee Benefit and Compensation - Plan Records</li> <li>- Workers' Compensation Records</li> </ul>	Compensation for Occupational Injuries & Diseases Act
<ul style="list-style-type: none"> <li>- Digital Signatures</li> <li>- Transactional Records</li> <li>- Records of third parties to whom information is disclosed</li> </ul>	Electronic Communications and Transactions Act
<ul style="list-style-type: none"> <li>- Employment Equity Plans and Targets</li> </ul>	Employment Equity Act

Category of Records	Applicable Legislation
<ul style="list-style-type: none"> <li>- Clients' Identification and Contact Details (Identity Number, Phone Number, Age, Address, Bank Account Details)</li> <li>- Demographic Records Demographic Details (Age, Income, Gender, Location)</li> <li>- Policy Wording</li> <li>- Policy Schedules</li> <li>- Disclosure Notices</li> <li>- Financial Records (Premium Collections)</li> <li>- Records of Premature Cancellations of Transactions or Financial Products by Clients</li> <li>- Records of Complaints received together with an indication whether or not any such complaints have been resolved</li> <li>- Claims Records and Call Recordings</li> <li>- Marketing Project File (Product or Campaign Implemented)</li> <li>- Marketing Project File (Product or Campaign Not Implemented)</li> <li>- Public Communications Such as Press Releases and Talking Points</li> <li>- Telemarketing Records</li> <li>- Representatives and Key Individual Records (Appointment, Fit and Proper Requirements, Continuing Professional Development)</li> <li>- Producer Licensing and Appointments</li> <li>- Customer Call Recordings</li> <li>- Complaints Handling Information</li> </ul>	Financial Advisory and Intermediary Services Act
<ul style="list-style-type: none"> <li>- Identity Number of prospective or existing client and occupation</li> <li>- Client Due-Diligence Records</li> <li>- Ownership and Control Structure of the Client / Entity</li> <li>- Information regarding the business relationship (nature and purpose of business)</li> <li>- The source of income / funds / wealth that the client expects to use during the business relationship</li> </ul>	Financial Intelligence Centre Act

Category of Records	Applicable Legislation
<ul style="list-style-type: none"> <li>- The anticipated level and nature of the activity that is to be undertaken during the business relationship</li> <li>- The nature and extent of the activity / business activity that the client may be involved in</li> <li>- Sanctions Screening records</li> </ul>	Financial Intelligence Centre Act (Cont.)
<ul style="list-style-type: none"> <li>- PAYE Records</li> <li>- SARS records</li> <li>- Unemployment Insurance Fund (UIF) files</li> <li>- Accounting and Finance Records</li> <li>- VAT records</li> </ul>	Income Tax Act
<ul style="list-style-type: none"> <li>- Statutory Applications and Notifications</li> <li>- Key Persons Personal Information and Personal Records</li> <li>- Correspondence and Submissions to the Authority</li> <li>- Licensing and Authorizations</li> </ul>	Insurance Act
<ul style="list-style-type: none"> <li>- Disciplinary records, including outcomes</li> <li>- Labor Relations Reports</li> <li>- Arbitration Awards</li> <li>- Records of Strike Action and Protests</li> <li>- Employee Complaints / Investigations and Employee Relations</li> <li>- Employee Handbook (Staff Policies/Rules)</li> </ul>	Labor Relations Act
<ul style="list-style-type: none"> <li>- License Certificates</li> <li>- Intermediary Agreements</li> <li>- Binder Agreements</li> <li>- Outsourced Service Provider Agreements</li> <li>- Policy Wording</li> <li>- Policy Schedules</li> </ul>	Long Term Insurance Act
<ul style="list-style-type: none"> <li>- Occupational Health and Safety (OHS) Reports including the following:</li> <li>- Learning History Report</li> <li>- OHS Agreement</li> <li>- OHS Appointment Letters</li> <li>- Data Centre Procedure Documents</li> <li>- Incident Reports</li> <li>- Personal information for workmen's compensation</li> <li>- Personal information of visitors to our premises and branches</li> <li>- CCTV footage</li> </ul>	Occupational Health and Safety Act

Category of Records	Applicable Legislation
<ul style="list-style-type: none"> <li>- Membership Details (Name and Surname, Contact Number, Identity Number, Phone Number, Age, Address, Bank Account Details)</li> <li>- Contribution Records</li> <li>- Member Benefit Statements</li> <li>- Tax Applications, Directives, and Certificates (where applicable)</li> <li>- Member Choice Forms</li> <li>- Member Claim Forms Beneficiary Nomination Details</li> <li>- Information furnished to the Fund at claim stage to execute the duties in terms of section 37C of the Pension Funds Act</li> </ul>	Pension Funds Act
<ul style="list-style-type: none"> <li>- PAIA Manual</li> <li>- PAIA Requests and Outcome</li> </ul>	Promotion of Access to Information Act
<ul style="list-style-type: none"> <li>- Grievances Logged</li> <li>- Outcome of Grievances</li> </ul>	Promotion of Equality and Prevention of Unfair Discrimination Act
<ul style="list-style-type: none"> <li>- POPIA Operating Contract</li> <li>- Data Transfer Agreement</li> <li>- Layered Privacy Notices and Privacy Policy</li> <li>- Data Subject Rights Requests</li> <li>- Privacy Policy</li> </ul>	Protection of Personal Information Act
<ul style="list-style-type: none"> <li>- License Certificates</li> <li>- Intermediary Agreements</li> <li>- Binder Agreements</li> <li>- Outsourced Service Provider Agreements</li> <li>- Policy Wording</li> <li>- Policy Schedules</li> </ul>	Short Term Insurance Act
<ul style="list-style-type: none"> <li>- Sector Education and Training Authority (SETA) reports</li> <li>- Learning History Reports</li> <li>- Skills Development Levies</li> <li>- Certificates of Completion</li> </ul>	Skills Development Act

Category of Records	Applicable Legislation
<ul style="list-style-type: none"> <li>- Contracts And Agreements – Intercompany</li> <li>- Booking Sheets and Reports</li> <li>- Underwriting File and Policy File - (Claims Made or Claims Made and Reported Policies) And Index and Fixed Annuity Contract Files</li> <li>- Underwriting File and Policy File - Occurrence Based Policies</li> <li>- Outside Counsel Engagements</li> </ul>	Tax Administration Act
<ul style="list-style-type: none"> <li>- Address of the business, and any of its branches, of the Employer</li> <li>- The names, identification numbers and monthly remuneration of each of its employees and must state the address at which the employee is employed</li> <li>- Employee Identification Details &amp; Documents</li> <li>- Financial Records (Salary, Banking Details, SARS)</li> <li>- The amount of benefits for purposes of section 13(3)</li> <li>- The benefits the applicant is entitled to in terms of section</li> </ul>	Unemployment Insurance Act
<ul style="list-style-type: none"> <li>- Financial Records</li> <li>- Tax records</li> </ul>	Value Added Tax Act

## 8. TYPES OF RECORDS HELD BY AIG SOUTH AFRICA

AIG South Africa holds 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.

Subjects on which the body holds Records	Categories of Records
Accounting and Finance	<ul style="list-style-type: none"> <li>- Accounting Period Records</li> <li>- Accounts Payables</li> <li>- Accounts Receivables</li> <li>- Financial Reporting and Work Papers</li> <li>- Internal Banking Records</li> <li>- Meeting Records – Financial Control</li> <li>- Profit and Loss Statements</li> </ul>

Subjects on which the body holds Records	Categories of Records
Accounting and Finance (Cont.)	<ul style="list-style-type: none"> <li>- Meeting Records – Transaction Review/Financial Risk Related Committee</li> <li>- Debt</li> <li>- Loans and Financial Obligations</li> </ul>
Actuarial	<ul style="list-style-type: none"> <li>- Actuarial Models</li> <li>- Communications between Actuarial and Business Lines</li> <li>- Profitability Studies</li> <li>- Reserve Calculation Documentation</li> <li>- Solvency II Preparation</li> </ul>
Administration	<ul style="list-style-type: none"> <li>- Historical Archives</li> <li>- Records Management Function</li> </ul>
Claims	<ul style="list-style-type: none"> <li>- Claims Data and Claims Handling Information</li> <li>- Staff Counsel Case Files</li> </ul>
Common Business Records	<ul style="list-style-type: none"> <li>- Audit Records</li> <li>- Business Administration Records</li> <li>- Business Internal Controls: Security Videos</li> <li>- Business Internal Controls: Corporate Security Investigations</li> <li>- Business Continuity and Disaster Recovery Plans</li> <li>- Consumer Complaints, Responses, And Supporting Materials</li> <li>- Contracts Agreements (3<sup>rd</sup> Party, Inter-Company)</li> <li>- Credit Risk Assessments</li> <li>- Employee Expense Reports, Related Internal Reports, And Supporting Materials</li> <li>- Financial Planning</li> <li>- Internal Insurance Records</li> <li>- Internal Policies, Procedures and Operating Manuals</li> <li>- Marketing And Advertising Materials &amp; Presentations - Non-Life Insurance Products</li> <li>- Marketing And Advertising Materials &amp; Presentations – Life Insurance Products</li> <li>- Producer Licensing and Appointments</li> <li>- Rating Agency Interaction Records</li> <li>- Regulatory Examination, Inquiry, Investigation and Remediation Supporting Materials and Related Correspondence</li> <li>- Regulatory Filings and Reporting, Supporting Materials and Related Correspondence</li> </ul>

Subjects on which the body holds Records	Categories of Records
Common Business Records (Cont.)	<ul style="list-style-type: none"> <li>- Regulatory Filings and Reporting, Supporting Materials, And Related Correspondence for Life Insurance Products</li> <li>- Assumed Reinsurance (Facultative and Treaty) And Ceded Facultative Reinsurance Agreements and Supporting Materials</li> <li>- Ceded Treaty Reinsurance Agreements and Supporting Materials</li> <li>- Assumed Reinsurance (Facultative and Treaty) And Ceded Facultative Claims Handling</li> <li>- Ceded Treaty Reinsurance Claims Handling</li> <li>- Risk Transfer Worksheets, Documentation and Reports – Occurrence Based Policies</li> <li>- Risk Transfer Worksheets, Documentation and Reports – Claims Made and Reported Policies</li> <li>- Risk Transfer Worksheets, Documentation and Reports – All Other</li> </ul>
Compliance	<ul style="list-style-type: none"> <li>- Compliance Committee Records</li> <li>- Compliance Data Analytics and Monitoring Activities and Testing Reports and Workpapers</li> <li>- Compliance Policies – Inquiries and Advice</li> <li>- Compliance Risk Assessment Materials</li> <li>- Investigation Records</li> <li>- Law Department and Compliance Bulletins</li> <li>- Producer Compensation Policy – Inquiries, Advice &amp; Reporting</li> <li>- Office of Foreign Assets Control Compliance Program</li> <li>- Anti-Boycott</li> <li>- Blocked Property</li> </ul>
Corporate Records	<ul style="list-style-type: none"> <li>- Asset Records – Corporate Real and Personal Property</li> <li>- Certificate of Incorporation, Articles of Incorporation, Bylaws, Corporate Seal</li> <li>- Intellectual Property Records</li> <li>- Investment Planning and Records of Investments</li> <li>- Meeting Minutes – Shareholder, Board of Directors, and Board Committees</li> <li>- Merger And Acquisition, Divestiture, Or Reorganization Records – Completed Deals</li> <li>- Merger And Acquisition, Divestiture, Or Reorganization Records – Abandoned Deals</li> <li>- Securities (Equity and Debt) Records</li> <li>- Shareholder Records</li> </ul>

Subjects on which the body holds Records	Categories of Records
Human Resources	<ul style="list-style-type: none"> <li>- Drug Screen Results-Positive Tests</li> <li>- Drug Screen Results-Negative Tests</li> <li>- Employee Benefit and Compensation - Plan Records</li> <li>- Employee Pension Plan Records</li> <li>- Employee Benefit and Compensation – Supporting Documents</li> <li>- Employee Complaints / Investigations and Employee Relations</li> <li>- Employee Medical Records – Medical Department/New York</li> <li>- Employee Personnel Records</li> <li>- Applicant Records (Not Hired)</li> <li>- Employee Relocation Supporting Documents</li> <li>- Employee Leave of Absence Records</li> <li>- Human Resources Training Records</li> <li>- Immigration Records: General</li> <li>- Payroll</li> <li>- Workers' Compensation Records</li> <li>- Employee Leave of Absence Records</li> <li>- Human Resources Training Records</li> <li>- Immigration Records: General</li> <li>- Payroll</li> <li>- Workers' Compensation Records</li> <li>- Employee Verification Checks (Credit, Criminal and qualification)</li> <li>- Employee Fingerprints</li> </ul>
Information Technology	<ul style="list-style-type: none"> <li>- Change Management Process Records</li> <li>- Information Technology Governance</li> <li>- Information Security Cyber Event Records</li> <li>- Information Security Activity Logging</li> <li>- Projects</li> <li>- Release Notes</li> <li>- Run Books; Software Manuals / Documentation (Non-Tax Data); Source Code</li> <li>- Software Manuals for Tax Data</li> <li>- Systems Security</li> </ul>



Subjects on which the body holds Records	Categories of Records
Insurance Business Units	<ul style="list-style-type: none"> <li>- Booking Sheets and Reports</li> <li>- Business Submissions (Declined)</li> <li>- Underwriting File and Policy File - (Claims Made or Claims Made and Reported Policies) And Index and Fixed Annuity Contract Files</li> <li>- Underwriting File and Policy File - Occurrence Based Policies</li> <li>- Underwriting File and Policy File - Mortgage Insurance Policies</li> <li>- Recoveries And Collections Files – Mortgage and Credit Insurance Policies</li> <li>- Underwriting Guidelines and Policies, Procedures, And Authority</li> </ul>
Law Department	<ul style="list-style-type: none"> <li>- Certificates Of Authority, Qualifications to Do Business, Licenses and Whitelisting Records</li> <li>- Unique And Important Litigation Materials</li> <li>- Lobbying Records</li> <li>- Outside Counsel Engagements</li> <li>- Third Party Subpoenas</li> </ul>
Marketing/Communications	<ul style="list-style-type: none"> <li>- Annual Report Support Activities</li> <li>- Marketing Project File (Product or Campaign Implemented)</li> <li>- Marketing Project File (Product or Campaign Not Implemented)</li> <li>- Public Communications Such as Press Releases and Talking Points</li> <li>- Sweepstakes And Contests</li> <li>- Telemarketing Records</li> </ul>
Privacy Governance	<ul style="list-style-type: none"> <li>- Individual Rights Management</li> <li>- Data Subject Exercise of Rights</li> </ul>
Registered Companies	<ul style="list-style-type: none"> <li>- Anti-Money Laundering Information</li> <li>- Anti-Money Laundering – Training Manuals</li> <li>- Broker-Dealer Records: Retention Category 1</li> <li>- Customer Account Records</li> <li>- Fingerprint Exemptions</li> <li>- Functions And Responsibilities</li> <li>- Investment Adviser Records and Certain Investment Company Records</li> <li>- Investment Company Records and Certain Money Market Fund Requirements</li> </ul>

Subjects on which the body holds Records	Categories of Records
Registered Companies (Cont.)	<ul style="list-style-type: none"> <li>- Investment Adviser Records – Journals &amp; Ledgers</li> <li>- Management Records</li> <li>- Registered Companies Policies and Procedures</li> <li>- Broker / Dealer Employee Registration and Licensing Records</li> <li>- Special Mailings and Fund Substitution Letters</li> <li>- Investment Company Audit Committee Charter and Certain Other Investment Company Records</li> </ul>
Tax	<ul style="list-style-type: none"> <li>- Tax Returns - Direct: Workpapers; Supporting Materials; Audits; Protests; Research</li> <li>- Tax Returns - Indirect: Workpapers; Supporting Materials</li> <li>- Tax Accounts</li> <li>- Tax Compliance</li> </ul>
Underwriting Resources Division	<ul style="list-style-type: none"> <li>- Formal Position Document</li> <li>- Underwriting Governance Materials</li> <li>- Underwriting Guidelines and Policies, Procedures, And Authority</li> <li>- Underwriting Resource Division Audit Manual</li> </ul>

## 9. PROCESSING OF PERSONAL INFORMATION

### 9.1. Purpose of Processing Personal Information

We may be required to obtain Personal Information to comply with applicable legal requirements, and certain Personal Information may be needed to enable us to fulfil the terms of our contract, or in preparation of entering into a contract.

### 9.2. 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
Customers / Beneficiaries / Life Assureds / 3 <sup>rd</sup> Party Claimants / Witnesses	<ul style="list-style-type: none"> <li>- General Identification and Contact Information</li> <li>- Financial Information</li> <li>- Banking Information</li> <li>- Health / Medical Information</li> <li>- Sexual Orientation</li> </ul>

Categories of Data Subjects	Personal Information that may be processed
Customers / Beneficiaries / Life Assureds / 3 <sup>rd</sup> Party Claimants / Witnesses (Cont.)	<ul style="list-style-type: none"> <li>- Marital Status / Spouse</li> <li>- Demographic Information / Citizenship</li> <li>- Information on Minors</li> <li>- Employment Status</li> <li>- Entity Name and Contact Information</li> <li>- Company Registration Details</li> <li>- Tax Information</li> <li>- Shareholding Information</li> <li>- Directorship Information</li> </ul>
Employees / Consultants / Contractors	<ul style="list-style-type: none"> <li>- General Identification and Contact Information</li> <li>- Financial Information</li> <li>- Banking Information</li> <li>- Health/Medical Information</li> <li>- Sexual Orientation</li> <li>- Marital Status / Spouse</li> <li>- Demographic Information / Citizenship</li> <li>- Biometric Information</li> <li>- Ethnicity Information</li> <li>- Education Qualifications and Professional Registrations</li> <li>- Next of Kin Information</li> <li>- Employment History</li> <li>- Tax Information</li> <li>- Pension Fund Information</li> <li>- Criminal Checks</li> <li>- Performance and Disciplinary Information</li> </ul>
Outsourced Service Providers / Suppliers	<ul style="list-style-type: none"> <li>- Entity Name and Contact Information</li> <li>- Company Registration Details</li> <li>- Banking Details</li> <li>- Financial Information</li> <li>- Tax Information</li> <li>- Shareholding Information</li> <li>- Directorship Information</li> <li>- BEE Status</li> </ul>
Intermediaries / Brokers	<ul style="list-style-type: none"> <li>- Entity Name and Contact information</li> <li>- Intermediary Licencing Information</li> <li>- Company Registration Details</li> <li>- Banking Details</li> <li>- Financial Information</li> <li>- Tax Information</li> <li>- Shareholding Information</li> <li>- Directorship Information</li> <li>- BEE Status</li> </ul>

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

Category of Personal Information	Recipients or Categories of Recipients to whom the personal information may be supplied
<ul style="list-style-type: none"> <li>- Employee Personal Information and Records</li> <li>- Licensing Information</li> <li>- Company Secretarial</li> <li>- Policy Holder Personal and Policy Information</li> <li>- Financial Records</li> <li>- Statutory Reports</li> </ul>	Regulatory Authorities
<ul style="list-style-type: none"> <li>- Contracts and Agreements</li> <li>- Banking Records</li> <li>- Tax Records</li> <li>- Product Performance</li> <li>- BBBEE Information</li> </ul>	Intermediaries / Brokers
<ul style="list-style-type: none"> <li>- Contracts and Agreements</li> <li>- Banking Records</li> <li>- Tax Records</li> <li>- BBBEE Information</li> </ul>	Outsourced Services Providers
<ul style="list-style-type: none"> <li>- Financial Records</li> <li>- Tax Records</li> </ul>	South African Reserve Bank
<ul style="list-style-type: none"> <li>- Customer Identity Numbers, Names and Address</li> <li>- Employee Identity Numbers, Names and Address</li> </ul>	South African Police Services
<ul style="list-style-type: none"> <li>- Customer Identity Numbers, Names and Address</li> <li>- Customer Credit and Payment History</li> </ul>	Credit Bureaus
<ul style="list-style-type: none"> <li>- Policy Holder Personal and Policy Information</li> <li>- Claims Information</li> </ul>	Law Firms - Claims
<ul style="list-style-type: none"> <li>- Employee names, identity numbers and demographics</li> </ul>	INSETA
<ul style="list-style-type: none"> <li>- Employee Name, Identity Numbers Demographics</li> <li>- Employee Banking Details</li> <li>- Medical and Health Information</li> </ul>	Medical Aid Provider
<ul style="list-style-type: none"> <li>- Identification and Qualifications details</li> </ul>	South African Qualifications Authority
<ul style="list-style-type: none"> <li>- Share Holder and Suppliers</li> </ul>	BBBEE Verification Agency
<ul style="list-style-type: none"> <li>- Employee Names and Identity Numbers</li> <li>- Qualifications</li> </ul>	Training Providers
<ul style="list-style-type: none"> <li>- Employee Names, Identity Numbers and Demographics</li> <li>- Employee PAYE Information</li> <li>- Employee Leave Information</li> <li>- Banking Details</li> </ul>	Payroll Management Company

Category of Personal Information	Recipients or Categories of Recipients to whom the personal information may be supplied
<ul style="list-style-type: none"> <li>- Employee Names, Identity Numbers and Demographics</li> <li>- Employee PAYE Information</li> <li>- Banking Details</li> <li>- Pension Fund Records</li> <li>- Beneficiary Details</li> </ul>	Pension Fund Administrators
<ul style="list-style-type: none"> <li>- Employee Names, Identity Numbers and demographics</li> <li>- Banking Details</li> <li>- Beneficiary Details</li> <li>- Claim Information</li> <li>- Medical and Health Information</li> </ul>	Employee Insurance Service Providers

#### 9.4 Planned Transborder Flows of Personal Information

Due to the global nature of our business, for the purposes set out above AIG South Africa may transfer personal information to parties located in other countries (including the United States and other countries that have a different data protection regime than is found in the Republic). For example, we may transfer personal information in order to process international travel insurance claims and provide emergency medical assistance services when you are abroad. We may transfer information internationally to our group companies, service providers, business partners and governmental or public authorities. When making these transfers, AIG South Africa will take steps to ensure that personal information is adequately protected and transferred in accordance with the requirements of data protection law.

#### Countries other than the Republic where Personal Information may be Stored or Processed:

Countries	Categories of Personal Information
India	<ul style="list-style-type: none"> <li>- Customer Personal Information (Names, Identity Numbers, Contact and Demographics)</li> <li>- Insurance Contract Information</li> <li>- Medical and Health Information</li> <li>- Claims Information</li> <li>- Family Details</li> <li>- Employee Personal Information</li> <li>- Financial Information</li> <li>- Immigration Documentation</li> <li>- Company Share Ownership/Directorship Information</li> <li>- Compensation, Payroll &amp; Expenses information</li> <li>- Employment Contract Information</li> </ul>
Kenya	<ul style="list-style-type: none"> <li>- Basic Personal Details (Names and Contact Details)</li> <li>- General Employment Information</li> <li>- Health Data</li> <li>- Insurance Contract Information</li> <li>- Personal Claim Information</li> </ul>

Countries	Categories of Personal Information
Ireland	<ul style="list-style-type: none"> <li>- Customer Personal Information (Names, Contact and Demographics)</li> <li>- Insurance Contract Information</li> <li>- Medical and Health Information</li> <li>- Criminal Records</li> <li>- Estate and Will Information</li> <li>- Claims Information</li> <li>- Family Details</li> <li>- Employee Information</li> <li>- Financial Information</li> <li>- Voice Recordings</li> <li>- Immigration Documentation</li> <li>- Employee Travel Information</li> </ul>
Malaysia	<ul style="list-style-type: none"> <li>- Customer Personal Information (Names, Identity Numbers, Contact and Demographics)</li> <li>- Insurance Contract Information</li> <li>- Medical and Health Information</li> <li>- Criminal Records</li> <li>- Estate and Will Information</li> <li>- Claims Information</li> <li>- Family Details</li> <li>- Employee Information</li> <li>- Financial Information</li> <li>- Educational Information</li> </ul>
Philippines	<ul style="list-style-type: none"> <li>- Customer Personal Information (Names, Identity Numbers, Contact and Demographics)</li> <li>- Financial Transaction Details</li> <li>- General Employment Information</li> <li>- Medical and Health Information</li> <li>- Insurance Contract Information</li> <li>- Medical Records</li> <li>- Personal Claim Information</li> </ul>
Bulgaria	<ul style="list-style-type: none"> <li>- General Employment Information</li> <li>- Personal Claim Information</li> </ul>

Countries	Categories of Personal Information
United States	<ul style="list-style-type: none"> <li>- Compensation, Payroll &amp; Expenses Information</li> <li>- Personal Information (Names, Identity Numbers, Contact and Demographics)</li> <li>- Insurance Contract Information</li> <li>- Medical and Health Information</li> <li>- Criminal Records</li> <li>- Estate and Will Information</li> <li>- Claims Information</li> <li>- Family Details</li> <li>- Employee Information</li> <li>- Financial Information</li> <li>- Educational Information</li> <li>- Immigration Documentation</li> <li>- Job Application</li> <li>- Voice Recordings</li> <li>- Marketing and Customer Interaction</li> <li>- Company Share Ownership/Directorship Information</li> <li>- Employee Travel Information</li> </ul>
United Kingdom	<ul style="list-style-type: none"> <li>- Compensation, Payroll &amp; Expenses Information</li> <li>- Customer Personal Information (Names, Identity Numbers, Contact and Demographics)</li> <li>- Insurance Contract Information</li> <li>- Medical and Health Information</li> <li>- Criminal Records</li> <li>- Estate and Will Information</li> <li>- Claims Information</li> <li>- Family Details</li> <li>- Employee Information</li> <li>- Financial Information</li> <li>- Educational Information</li> <li>- Immigration Documentation</li> <li>- Job Application Information</li> <li>- Voice Recordings</li> <li>- Marketing and Customer Interaction</li> <li>- Company Share Ownership/Directorship Information</li> <li>- Employee Travel Information</li> </ul>

## 9.5 General description of Information Security Measures to be implemented by the responsible party to ensure the confidentiality, integrity, and availability of the information.

AIG South Africa maintains, operates, and regularly tests a comprehensive, documented information security program designed to protect the confidentiality, integrity, and availability of personal information. AIG South Africa's information security program complies with applicable privacy and security laws and includes appropriate technical, administrative, physical, organizational, and operational measures and controls to ensure a level of security appropriate to the information security risk. These security measures include encryption, limiting access to personal information, technical access controls such as password and multi-factor authentication protections and other controls to limit access to personal information such as the use of firewalls, the use of anti-virus software, recording access logs and maintaining written policies and procedures. AIG South Africa ensures that all personnel are trained as necessary in relation to our information security program.

AIG South Africa has implemented a comprehensive Information Security Program (Policy, Procedures and Controls) to ensure the safety and security of physical (hardcopy) records containing personal information. Security and safety controls are designed to maintain confidentiality, prevent loss, damage, or any compromise to information by unauthorized personnel, fire and or dampness to records stored in onsite storage facilities. These safety and security procedures include storing of records in secure record storage rooms with restricted access and general surveillance systems and access controls to prevent unauthorized access, and controls to prevent unauthorized destruction of records.

The following additional measures have been implemented for Record Storage Room:

- Physical Access Control Systems – access granted to authorized personnel
- Electronic Security Systems (Security Video and Alarms) – surveillance and intrusion detection
- Fireproof – Fire Prevention, walls, floors, and ceiling constructed with non-combustible materials
- Fire Safety Equipment – Fire alarm and sprinklers (detection and protection)
- Air conditioner -Temperature control, maintained at room temperature
- Storage Racks (raised from floor and installed away from walls) – prevention of dampness and mold
- No windows – prevention of damage from sun

## 10. AVAILABILITY OF THE MANUAL

10.1. A copy of the Manual is available:

10.1.1. on [www.aig.co.za](http://www.aig.co.za);

10.1.2. Office of AIG South Africa for public inspection during normal business hours;

10.1.3. to any person upon request and upon the payment of a reasonable prescribed fee as contemplated in Annexure B of the Regulations; and

10.1.4. to the Information Regulator upon request.

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



## 11. UPDATING OF THE MANUAL

The IO of AIG South Africa will on a regular basis update this manual.

***Issued by***

***Paul Donovan***

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Information Officer AIG South Africa Limited