#### **MANUAL**

# Prepared in terms of

# Section 51 of The Promotion of Access to Information Act 2 of 2000 and

The Protection of Personal Information Act, 4 of 2013

for assistance in requesting information from:

# **RGA Reinsurance Company of South Africa Limited**

(Registration No: 1997/020948/06),

a 100% owned subsidiary of

# **RGA South African Holdings (Proprietary) Limited**

(Registration No: 1997/020923/07)

#### 1. Introduction

This Manual is published in terms of Section 51 of the Promotion of Access to Information Act, 2000 ("PAIA") and the Protection of Personal Information Act 2013 ("POPIA"). These Acts give effect to the provisions of section 32 of the Constitution, which provides for the right of access to information held by the State and to information held by another person that is required for the exercise and/ or protection of any right.

The reference to any information in addition to that specifically required in terms of Section 51 of the PAIA does not create any right or entitlement (contractual or otherwise) to receive such information, other than in terms of the PAIA.

RGA South African Holdings (Proprietary) Limited acts as a holding company for the operating entity, RGA Reinsurance Company of South Africa Limited ("RGA") (together the "Companies").

RGA was established in late 1998 as a foreign subsidiary of RGA Inc. RGA has grown to become a significant competitor in the life reinsurance market. The Companies operate out of offices in Johannesburg and Cape Town.

RGA is entitled, through its registration under the Insurance Act 18 of 2017, to conduct the following classes of reinsurance business:

Funeral

Risk

Fund Risk

Credit Life

Life Annuities

Reinsurance

# 2. List of subjects and records held by the above companies to which you could be entitled to access:

#### a. Policyholders and Beneficiaries

All records kept in terms of the provisions of the Insurance Act 18 of 2017 and the financial services industry (in general) pertaining to the reinsurance products offered.

#### b. Companies Act Records

a. Policyholders ate oe p-1.1497 8 Life Policyuities F u n d R i s k

#### d. Other

All other records kept in terms of the legislation applicable to any of the abovementioned products or services and the financial services industry (in general), including the Securities Register.

#### 3. How to obtain information

A request for access to a record of the Company must be made in the form as prescribed in section 53 of PAIA. Complete the prescribed application form available at this link: https://www.justice.gov.za/legislation/acts/2000-002.pdf

A requester is required to complete the necessary application form and submit same to the Information Officer of the Company using the contact details as follows:

Information Officer: Michael Porter (Managing Director)

Email: infosa@rgare.com
Tel: (021) 4861811
Fax: (021) 4861702
Postal address: PO Box 13422

Mowbray 7705

Address: 7<sup>th</sup> Floor, The Terraces Black River Park

2 Fir Street Observatory

7825

The Information Officer will cause the application to be processed and inform the requester of fees, if any to be paid and any outstanding requirements in order to finalise the application.

NOTE: Access to certain records may be denied on the grounds set out in the PAIA.

A copy of the guide by the South African Human Rights Commission (SAHRC) as described in Section 10 of PAIA may be obtained from the SAHRC using the following details:

The SAHRC Research and Documentation Department

Postal Address: Private Bag 2700

Houghton 2041

Telephone: (011) 484 8300 Fax: (011) 484 1360 Website: www.sahrc.org.za

#### 4. Protection of Personal Information that is Processed by the Company

- 4.1 Chapter 3 of POPIA provides for the minimum Conditions for Lawful Processing of Personal Information by a Responsible Party. These conditions may not be derogated from unless specific exclusions apply as outlined in POPIA.
- 4.2 The Company needs Personal Information relating to both individual and juristic persons in order to carry out its business and organisational functions. The manner in which this information is Processed and the purpose for which it is Processed is determined by the Company. The Company is at times both an Operator and a Responsible Party in terms of its contractual obligations. The Company is accordingly a Responsible Party for the purposes of POPIA and will ensure that the Personal Information of a Data Subject:
  - is processed lawfully, fairly and transparently. This includes the provision of appropriate information to Data Subjects when their data is collected by the Company, in the form of privacy or data collection notices. RGA must also have a legal basis (for example, consent) to process Personal Information;
  - ii. is processed only for the purposes for which it was collected;
  - iii. will not be processed for a secondary purpose unless that processing is compatible

- with the original purpose.
- iv. is adequate, relevant and not excessive for the purposes for which it was collected;
- v. is accurate and kept up to date;
- vi. will not be kept for longer than necessary;
- vii. is processed in accordance with integrity and confidentiality principles; this includes physical and organisational measures to ensure that Personal Information, in both physical and electronic form, are subject to an appropriate level of security when

4.4Categories of Data Subjects and Persona	al Information/Special Personal Information relating thereto
4.4Categories of Data Subjects and Personal Information/Special Personal Information relating thereto As per section 1 of POPIA, a Data Subject may either be a natural or a juristic person. The Table below includes but is not limited to the various categories of Data Subjects that the Company Processes Personal Information on and the types of Personal Information relating thereto.	
Categories of data subjects Corporate	Group companies

**Personal details:** name, age, gender, date of birth, photographs, marital status, nationality, height and weight, employee number.

**Identification information:** government-issued ID and other certificates (for example, marriage certificates), driving license, taxpayer identification number, national ID number, passport ID number.

Corporate details: company name, identification number.

Contact information: address, telephone number and email address.

**Information about family:** marital status, number of children and their name, age, gender, date of birth, address.

**Employment information:** employment history, employer, job role, employment contract, start and leave dates, working pattern.

**Financial information:** details pertaining to a bank account, annual income and compensation.

**Insurance policy and claims related information:** policy number, previous insurance records and claims histories, insurance policy amount, terms and issue dates, recommendations and decisions regarding your policy underwriting and claims, including risk ratings.

**Education information:** educational background, professional licenses and qualifications, skills.

**Communication information:** communication preferences, opt-in/opt-out preferences, enquiries, complaints, requests.

Benefits related information: available benefits, payments claimed.

**Pay related information:** salary, payroll information, tax information, retirement and/or pension information, details of any leave, expenses claimed.

Personality test information

**Investigations related information:** grievance and dignity at work matters, disciplinary records, warnings or penalties issued, whistleblowing concerns.

**Security monitoring related information:** information derived from monitoring IT acceptable use standards and access to premises, including employee user ID, IT systems access logs, access card logs, CCTV records.

**Performance and training information:** performance at work, promotions, training history, development needs.

### Types / classes of special personal information processed

Racial or ethnic origin

Religious or other beliefs

4.5 Recipients of Personal Information

Other RGA group companies in other countries Retrocessionaires in other countries Suppliers and service providers in other countries.

4.7 Description of information security measures to be implemented by the Company

Security measures such as anti-malware detection, firewall, encryption, back-up and disaster recovery, systems access controls and other are implemented by the Company in order to ensure that Personal Information is protected.

The Company performs assessments of the suitability and effectiveness of information security measures in order to ensure that the Personal Information that is processed by the Company is safeguarded and Processed in accordance with the Conditions for Lawful Processing.

#### 5. Updating and availability of this Manual

This Manual will be reviewed, if necessary, on an annual basis and is available on RGA's website at: <a href="https://www.rgare.com/global-directory/emea/south-africa">https://www.rgare.com/global-directory/emea/south-africa</a>).

Reviewed and updated on 12 October 2021.