

PAIA MANUAL

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

DATE OF COMPILATION: 01/11/2021

UNIVERSAL LIFE BROKERS & CONSULTANTS CC
Vat Reg No 4510148440 • Company Reg No CK1989/012575/23 • FSP Reg No 5377
Managing Member: F Cline

Member of:



Authorised Financial Service Provider

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1. LIST OF ACRONYMS AND ABBREVIATIONS

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|-----|--------------------|---|
| 1.1 | “KI” | Key Individual |
| 1.2 | “DIO” | Deputy Information Officer; |
| 1.3 | “IO“ | Information Officer; |
| 1.4 | “Minister” | Minister of Justice and Correctional Services; |
| 1.5 | “PAIA” | Promotion of Access to Information Act No. 2 of 2000
(as amended); |
| 1.6 | “POPIA” | Protection of Personal Information Act No.4 of 2013; |
| 1.7 | “Regulator” | Information Regulator; and |
| 1.8 | “Republic” | Republic of South Africa |

2. PURPOSE OF PAIA MANUAL

This PAIA Manual is useful for the public to-

- 2.1 check the categories of records held by a body which are available without a person having to submit a formal PAIA request;
- 2.2 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;

- 2.3 know the description of the records of the body which are available in accordance with any other legislation;
- 2.4 access all the relevant contact details of the Information Officer and Deputy Information Officer who will assist the public with the records they intend to access;
- 2.5 know the description of the guide on how to use PAIA, as updated by the Regulator and how to obtain access to it;
- 2.6 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;
- 2.7 know the description of the categories of data subjects and of the information or categories of information relating thereto;
- 2.8 know the recipients or categories of recipients to whom the personal information may be supplied;
- 2.9 know if the body has planned to transfer or process personal information outside the Republic of South Africa and the recipients or categories of recipients to whom the personal information may be supplied; and
- 2.10 know whether the body has appropriate security measures to ensure the confidentiality, integrity and availability of the personal information which is to be processed.

3. KEY CONTACT DETAILS FOR ACCESS TO INFORMATION OF UNIVERSAL LIFE BROKERS & CONSULTANTS CC

3.1. Information Officer

Name: Melissa Mc Laughlin
Tel: (011) 781 3341
Email: melissa@unilifebrokers.com

3.2 Access to information general contacts

Email: mail@unilifebrokers.com

3.3 National or Head Office

Postal Address: PO Box 2915
Pinegowrie
2123

Physical Address: 1 Susman Avenue
Blairgowrie
Randburg
2194

Telephone: (011) 781 3341
Email: mail@unilifebrokers.com
Website: www.universallifebrokers.co.za

4. GUIDE ON HOW TO USE PAIA AND HOW TO OBTAIN ACCESS TO THE GUIDE

4.1. The Regulator has, in terms of section 10(1) of PAIA, as amended, updated and made available the revised Guide on how to use PAIA ("Guide"), in an easily comprehensible form and manner, as may reasonably be

required by a person who wishes to exercise any right contemplated in PAIA and POPIA.

4.2. The aforesaid Guide contains the description of-

4.2.1. the objects of PAIA and POPIA;

4.2.2. the postal and street address, phone and electronic mail address of-

4.2.2.1. the Information Officer of every private body designated in terms of section 17(1) of PAIA¹ and section 56 of POPIA²; and

4.2.3. the manner and form of a request for-

4.2.3.1. access to a record of a public body contemplated in section 11³; and

4.2.3.2. access to a record of a private body contemplated in section 50⁴;

¹ 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.*

² 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.*

³ 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.*

⁴ 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.*

- 4.2.4. the assistance available from the IO of a public body in terms of PAIA and POPIA;
- 4.2.5. the assistance available from the Regulator in terms of PAIA and POPIA;
- 4.2.6. 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-
 - 4.2.6.1. an internal appeal;
 - 4.2.6.2. a complaint to the Regulator; and
 - 4.2.6.3. an application with a court against a decision by the information officer 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;
- 4.2.7. the provisions of sections 14⁵ and 51⁶ requiring a public body and private body, respectively, to compile a manual, and how to obtain access to a manual;

⁵ 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 4 above.

⁶ 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.

- 4.2.8. the provisions of sections 15⁷ and 52⁸ providing for the voluntary disclosure of categories of records by a public body and private body, respectively;
- 4.2.9. the notices issued in terms of sections 22⁹ and 54¹⁰ regarding fees to be paid in relation to requests for access; and
- 4.2.10. the regulations made in terms of section 92¹¹.
- 4.3. Members of the public can inspect or make copies of the Guide from the offices of the public and private bodies, including the office of the Regulator, during normal working hours.
- 4.4. The Guide can also be obtained-
- 4.4.1. from the website of the Regulator (<https://www.justice.gov.za/inforeg/>).

⁷ 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

⁸ 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

⁹ 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.

¹⁰ 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.

¹¹ 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.”

5. CATEGORIES OF RECORDS OF UNIVERSAL LIFE BROKERS & CONSULTANTS CC WHICH ARE AVAILABLE WITHOUT A PERSON HAVING TO REQUEST ACCESS

Category of records	Types of the Record	Available on Website	Available upon request
FAIS Records	FSP Statutory Disclosures to clients		√
Representatives	Representative FAIS profiles		√

6. DESCRIPTION OF THE RECORDS OF UNIVERSAL LIFE BROKERS & CONSULTANTS CC WHICH ARE AVAILABLE IN ACCORDANCE WITH ANY OTHER LEGISLATION

Category of Records	Applicable Legislation
Memorandum of incorporation	Companies Act 71 of 2008
PAIA Manual	Promotion of Access to Information Act 2 of 2000
POPIA Manual	Protection of Personal Information Act 4 of 2013
FICA Risk Management Plan	Financial Intelligence Centre Act 38 of 2001
FAIS Statutory Disclosures	Financial Advisory and Intermediary Services Act 37 of 2002

7. DESCRIPTION OF THE SUBJECTS ON WHICH THE BODY HOLDS RECORDS AND CATEGORIES OF RECORDS HELD ON EACH SUBJECT BY UNIVERSAL LIFE BROKERS & CONSULTANTS CC

Subjects on which the body holds records	Categories of records
Clients	Personal Information; Investment/ Insurance portfolios; FICA documentation
Employees	FICA documentation; HR Records
Key Individuals/ Representatives	FAIS documentation
Product Suppliers (FAIS)	FAIS documentation; Service Level Agreements
IT Suppliers	Service Level Agreements
External Compliance	FAIS documentation; Service Level Agreements

8. PROCESSING OF PERSONAL INFORMATION

8.1 Purpose of Processing Personal Information

Personal Information of clients is processed for the purposes of carrying out our intermediary services in terms of the FAIS Act as mandated by the client.

8.2 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
Clients	name, address, registration numbers or identity numbers, employment status and bank details

Categories of Data Subjects	Personal Information that may be processed
Service Providers	names, registration number, vat numbers, address, trade secrets and bank details
Employees	address, qualifications, identity numbers, address

8.3 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
Clients	Product Suppliers
Clients	FAIS Compliance Officer
Clients	Regulators (FSCA/FIC)

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

Universal Life Brokers & Consultants CC outsources their IT service to Solid Systems, who provide the following services:

8.4.1 Technology Management Service: Recurring Onsite Visits & Site Improvement

- Schedule: Monthly for 3 hours each
- Response Time: GOLD

- Emergency Onsite Hours: 2

8.4.2 Proactive Support Plan - Legacy Server (used as a probe)

- Advanced Threat Security
- Security Management
- Patch Management
- 24/7 Automation and Hardware Monitoring

8.4.3 Proactive Support Plan – Workstation

- Advanced Threat Security
- Security Management
- Patch Management
- 24/7 Automation and Hardware Monitoring
- Workstation Asset Management

8.4.4 Proactive Support Plan – Network

- Connectivity Monitoring and Management
- Firewall Management
- Wireless Access Point Monitoring and Management
- Basic printer troubleshooting

8.4.5 Unlimited Helpdesk – Remote Support

- Response Time: GOLD
- Unlimited Remote Support for up to 20 users

Universal Life Brokers & Consultants CC infrastructure is set up as follows:

8.4.6 Data

- Company data is in SharePoint
- User data is in One Drive

- Cloud data is backed up using One Drive Protect, which runs in real time and includes desktop, documents and pictures

8.4.7 Disaster Recovery

- SharePoint allows for data to be restored by default within a 90-day period
- All Microsoft documents have version history which can be restored since the date of creation
- All user data (One Drive) has an online recycle bin for 30 days

8.4.8 Security In Place

- Anti-virus and remote monitoring are done via Solid Systems RMM system and managed by their NOC team. This is centrally managed.
- There is a Meraki UTM in place locally which scans network traffic and provided VPN connections for the staff that connect externally to the site.
- There is a valid subscription in place which includes support from Meraki.

8.4.9 Cloud Security

- Company data and emails are with Office 365, and the default security policies are in place for mail retention and anti-spam, as per Microsoft's recommendation.
- MFA has been enabled for all users and email accounts.
- Microsoft Defender for Office 365 has been set up on all email accounts, which increases the security for the business.

- Microsoft Defender for Office 365 monitors and protects all data within Office 365, which includes SharePoint Data and One Drive Data.

9. AVAILABILITY OF THE MANUAL

9.1 A copy of the Manual is available-

9.1.1 on www.universallifebrokers.co.za;

9.1.2 head office of the Universal Life Brokers & Consultants CC for public inspection during normal business hours;

9.1.3 to any person upon request and upon the payment of a reasonable prescribed fee; and

9.1.4 to the Information Regulator upon request.

9.2 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.

10. UPDATING OF THE MANUAL

The head of Universal Life Brokers & Consultants CC will on a regular basis update this manual

11 POPIA

This Manual is to be read together with the Protection of Personal Information (POPI) Manual of Universal Life Brokers & Consultants CC.

Issued by



Melissa Mc Laughlin
INFORMATION OFFICER