



Gallagher

Insurance | Risk Management | Consulting

PAIA AND POPIA MANUAL OF:

Gallagher Re (Pty) Limited ("Gallagher Re")

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1. LIST OF ACRONYMS AND ABBREVIATIONS

“CEO”	Chief Executive Officer
“CIPC”	Companies and Intellectual Property Commission
“EFT”	Electronic Funds Transfer
“ESG”	Environmental, Social, and Governance
“FSCA”	Financial Sector Conduct Authority
“Minister”	Minister of Justice and Correctional Services;
“PAIA”	Promotion of Access to Information Act No. 2 of 2000 (as Amended);
“POPIA”	Protection of Personal Information Act No.4 of 2013;
“Regulator”	The Information Regulator of South Africa; and
“Republic”	Republic of South Africa
“SARS”	South African Revenue Services
“VAT”	Value Added Tax

2. WHO IS GALLAGHER RE?

- 2.1 Gallagher Re is the full service global reinsurance division of Gallagher, one of the world's largest insurance brokerage, risk management and consulting firms. At Gallagher Re our goal is to be a trusted advisor to our clients. Relationships are at the heart of our business, with client focus and advocacy our number one priority. We inspire client confidence by providing unparalleled levels of reinsurance services, strategic insight and transactional excellence. We retain that confidence by continuing to attract the best talent in the market into our global reinsurance hubs around the world.
- 2.2 The full power of Gallagher Re is our integrated combination of that expertise with market-leading analytical services and capabilities. We support all of this with dedicated claims and treaty management, premium and accounting teams, creating an unrivaled reinsurance proposition for our clients. Everything we do at Gallagher Re is about pushing the boundaries of innovation. That is the common denominator in the advice we give to our clients and in the way we develop bespoke products and placements for reinsurance needs around the world.

3. PURPOSE OF PAIA AND POPIA MANUAL

- 3.1 This manual was prepared in accordance with section 51 of the Promotion of Access to Information Act, 2000 (“PAIA”) and to address the requirements of the Protection of Personal Information Act, 2013 (“POPIA”).

- 3.2 Under PAIA, Gallagher Re is required to grant individuals access to records held by Gallagher Re if that record is required by the individual to exercise or protect any legal right that individual enjoys under the law.
- 3.3 Additionally, under POPIA, Gallagher Re is required to be open and transparent about how Gallagher Re handles personal information, and allow individuals to access and correct their personal information.
- 3.4 This Manual sets out the information which Gallagher Re is legally required to disclose under PAIA and POPIA, and to explain how you can exercise your statutory rights under PAIA and POPIA with respect to records and personal information handled by Gallagher Re.
- 3.5 This PAIA Manual is useful for the public to-
 - 3.5.1 check the categories of records held by Gallagher Re which are available without a person having to submit a formal PAIA request;
 - 3.5.2 have a sufficient understanding of how to make a request for access to a record, by providing a description of the subjects on which Gallagher Re holds records and the categories of records held on each subject;
 - 3.5.3 know the description of the records of Gallagher Re which are available in accordance with any other legislation;
 - 3.5.4 access all the relevant contact details of the Information Officer who will assist the public with the records they intend to access;
 - 3.5.5 know the description of the guide on how to use PAIA, as updated by the Regulator and how to obtain access to it;
 - 3.5.6 know if Gallagher Re 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;
 - 3.5.7 know the description of the categories of data subjects and of the information or categories of information relating thereto;
 - 3.5.8 know the recipients or categories of recipients to whom the personal information may be supplied;
 - 3.5.9 know if Gallagher Re 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
 - 3.5.10 know whether Gallagher Re has appropriate security measures to ensure the confidentiality, integrity and availability of the personal information which is to be processed.

4. STATUS AND SCOPE OF THIS MANUAL

- 4.1 This Manual (version 1.3) was last updated on 20 October 2023 and will become effective on 20 October 2023.
- 4.2 This Manual applies only in respect to records and personal information in the possession of Gallagher Re (Pty) Limited referred to in the Manual as “Gallagher Re”.
- 4.3 This PAIA and POPIA Manual is available at the physical address of Gallagher Re at:

C/o : The Information Officer
Gallagher Re (Pty) Limited
115 West Street
Sandton
2031
Tel: +44 (0)20 7204 6000

Email: Amanda.Lightfoot@GallagherRe.com

Or via our website: <https://www.ajg.com/gallagherre/legal-regulatory-information/>

5. KEY CONTACT DETAILS FOR ACCESS TO INFORMATION OF GALLAGHER RE

- 5.1 PAIA prescribes the appointment of an Information Officer to, inter alia, assess requests for access to information. Although the CEO fulfils such function in terms of section 51 of PAIA, Gallagher Re has opted to appoint an Information Officer to assess such requests for access to information as well as to oversee its required function in terms of PAIA.
- 5.2 The Information Officer appointed in terms of PAIA is also referred to as the Information Officer for purposes of the POPIA. The Information Officer oversees the functions and responsibilities as required in terms of both PAIA as well as those required in terms of section 55 of POPIA.
- 5.3 The Contact details of the **CEO of Gallagher Re (Pty) Limited** are:

Name:	Natalie van de Coolwijk
Address:	115 West Street, Sandton, 2031
Tel:	+2773 169 3631
Email:	Natalie.vandeCoolwijk@GallagherRe.com

- 5.4 The Contact details of the **Information Officer of Gallagher Re (Pty) Limited** are:

Name:	Amanda Lightfoot
Address:	115 West Street, Sandton, 2031
Tel:	+2782 903 7697
Email:	Amanda.Lightfoot@GallagherRe.com



5.5 Access to information general contacts

Email: GlobalPrivacyOffice@ajg.com

5.6 The contact details of the National or Head Office

Postal Address: P.O. Box 411775, Craighall, 2024, South Africa

Physical Address: 115 West Street, Sandton, 2031, South Africa

Telephone: +2782 903 7697

Email: <https://www.ajg.com/gallagherre/contact-us/>

Website: <https://www.gallagherre.com/>

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

6.1 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.

6.2 The Guide is made available by the Regulator in each of the official languages and in braille.

6.3 The aforesaid Guide contains the description of-

6.3.1 the objects of PAIA and POPIA;

6.3.2 the postal and street address, phone and fax number and, if available, electronic mail address of-

s

6.3.2.1 the Information Officer of every public body, and

6.3.2.2 every Deputy Information Officer of every public and private body designated in terms of section 17(1) of PAIA and section 56 of POPIA;

6.3.3 the manner and form of a request for-

6.3.3.1 access to a record of a public body contemplated in section 11; and

6.3.3.2 access to a record of a private body contemplated in section 50;

6.3.4 the assistance available from the Information Officer of a public body in terms of PAIA and POPIA;

6.3.5 the assistance available from the Regulator in terms of PAIA and POPIA;



- 6.3.6 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-
 - 6.3.7.1 an internal appeal;
 - 6.3.7.2 a complaint to the Regulator; and
 - 6.3.7.3 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;
- 6.3.7 the provisions of sections 14 and 51 requiring a public body and private body, respectively, to compile a manual, and how to obtain access to a manual;
- 6.3.8 the provisions of sections 15 and 52 providing for the voluntary disclosure of categories of records by a public body and private body, respectively;
- 6.3.9 the notices issued in terms of sections 22 and 54 regarding fees to be paid in relation to requests for access; and
- 6.3.10 the regulations made in terms of section 92.
- 6.4 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 using the below contact details:

The Information Regulator of South Africa
Address: JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001.
P.O Box: 31533, Braamfontein, Johannesburg, 2017, South Africa
Email: enquiries@inforegulator.org.za
Web: <https://www.inforegulator.org.za/>
- 6.5 The Guide can also be obtained-
 - 6.5.1 upon request to the Information Officer;
 - 6.5.2 from the website of the Regulator (<https://www.inforegulator.org.za/>).

7. WHAT ARE MY RIGHTS UNDER PAIA AND POPIA?

What are my rights under PAIA?

- 7.1 Under PAIA, everyone has the right to access:
 - 1) any information held by the state; and
 - 2) any information that is held by another person and that is required for the exercise or protection of any rights.

- 7.2 A public body may make a request for information under PAIA only if, in making the request, the public body is acting in the public interest.
- 7.3 Records Gallagher Re makes available under PAIA are described in sections 8, 9 and 10 of this Manual. If you wish to make a request under PAIA to Gallagher Re, please follow the procedure described in section 12 of this Manual. Please note that your request will be subject to the applicable charges set out in section 12.5.
- 7.4 You can learn more about your rights under PAIA by contacting the Information Regulator using the contact details in section 6.4.

What are my rights under POPIA?

- 7.5 Under POPIA, everyone has various rights in respect of his/her/their own personal information.
Your rights under POPIA include your right to ask Gallagher Re to:
- 1) confirm whether or not Gallagher Re handles your personal information;
 - 2) grant access to your own personal information;
 - 3) correct, destroy, or delete your personal information, if your personal information held by Gallagher Re is inaccurate, irrelevant, excessive, out of date, incomplete, misleading, or was obtained illegally; or
 - 4) stop using your personal information in particular ways, for example by asking Gallagher Re to stop using your personal information for direct marketing purposes.
- 7.6 Further information regarding why and how Gallagher Re handles personal information of its job applicants, employees, temporary workers, contractors, other workers, prospects, clients, (re)insureds, claimants, suppliers and other persons who are not Gallagher Re's workers is embedded in Part E of this Manual.
- 7.7 Information Security Measures:

Gallagher Re undertakes to institute and maintain the data protection measures to accomplish the objectives outlined below. The below provided details are to be interpreted as examples of how to achieve an adequate data protection level for each objective. As required, Gallagher Re may enhance and alter their information security measures in light of broader industry developments provided that the objectives are achieved.

▪ **Access Control of Persons**

Gallagher Re shall implement suitable measures in order to prevent unauthorised persons from gaining access to the data processing equipment where personal information is processed.

▪ Data Control

Gallagher Re undertakes to implement suitable measures to prevent the unauthorised manipulation of data, including reading, copying, alteration or removal of the personal information used / in the control of Gallagher Re and containing personal information.

▪ Data Memory Control

Gallagher Re undertakes to implement suitable measures to prevent unauthorised input into data memory and the unauthorised reading, alteration or deletion of stored data.

▪ User Control

Gallagher Re shall implement suitable measures to prevent its data processing systems from being used by unauthorised person by means of data transmission equipment.

▪ Access Control to Data

Gallagher Re represents that the persons entitled to use its data processing systems are only able to access the data within the scope and to the extent covered by their respective authorisation.

▪ Transmission Control

Gallagher Re shall implement suitable measures to prevent personal information from being read, copied, altered or deleted by unauthorised persons during the transmission thereof or during the transport of the data.

▪ Organisational Control

Gallagher Re shall maintain its internal organisation in a manner that meets the requirements of this manual.

- 7.8 If you wish to make a request to Gallagher Re under POPIA in respect of your personal information, please follow the procedure described in Part B of this Manual. Please note that your request will be subject to the applicable charges set out in section 12.5.
- 7.9 POPIA establishes a new regulator called the Information Regulator. Should you wish to contact the Information Regulator, you may do so in one of the following ways laid out in section 6.4.
- 7.10 Should you wish to make a complaint with the Information Regulator you can complete and submit the complaint form (Form 5) which can be found on the Information Regulator [website](#).

8. CATEGORIES OF RECORDS OF GALLAGHER RE WHICH ARE AVAILABLE WITHOUT A PERSON HAVING TO REQUEST ACCESS

- 8.1 Records of a public nature, typically those disclosed on the Gallagher Re website may be accessed without the need to formally request access.
- 8.2 Other non-confidential records maintained at SARS and CIPC, may also be accessed without the need to submit a formal access request. However, please note that an appointment to view such records will still have to be made with the Information Officer.

9. DESCRIPTION OF THE RECORDS OF GALLAGHER RE WHICH ARE AVAILABLE IN ACCORDANCE WITH ANY OTHER LEGISLATION

- 9.1 The below table provides the records which are created and available in accordance with various South African legislation applicable to Gallagher Re.
- 9.2 Please note that to access records described below, you must follow the procedure for making a request under POPIA/PAIA as set out in section 12.
- 9.3 If you make a request to access the below records, Gallagher Re may deny your request where Gallagher Re is allowed to do so under PAIA and POPIA. For more detail on the potential grounds for refusal please consult section 12.3.

Category of Records	Applicable Legislation
<ul style="list-style-type: none"> • Records regarding: <ul style="list-style-type: none"> ○ Known premature cancellations of transactions or financial products by clients of the provider; ○ Complaints received together with an indication whether or not any such complaint has been resolved; ○ The continued compliance with the requirements referred to in section 8 of the Act; ○ Cases of non-compliance with this Act, and the reasons for such non-compliance; and ○ The continued compliance by representatives with the requirements referred to in section 13(1) and (2) of this Act by maintaining a representatives register. 	The Financial Advisory and Intermediary Service Act 37 of 2002
<ul style="list-style-type: none"> • Memorandum of Incorporation and alterations or amendments • Register of company secretary and auditors • Record of directors and past directors, after the director has retired from the company 	Companies Act 71 of 2008



<ul style="list-style-type: none"> • Reports presented at annual general meeting of the company • Annual financial statements • Accounting records • Notice and minutes of all shareholders meeting including: <ul style="list-style-type: none"> ○ Resolutions adopted ○ Document made available to holders of securities • Minutes and resolutions of directors' meetings, audit committee and directors' committees • Securities register and uncertificated securities register 	
<ul style="list-style-type: none"> • Records in respect of workforce • Employment equity plan • Section 21 report 	The Employment Equity Act
<ul style="list-style-type: none"> • Employment records containing the following information: <ul style="list-style-type: none"> ○ The employee's name and occupation; ○ The time worked by each employee; ○ The remuneration paid to each employee; ○ The date of birth of any employee under 18 years of age; and ○ Any other prescribed information. • Written particulars of employee after termination of employment 	The Basic Conditions of Employment Act 75 of 1997
<ul style="list-style-type: none"> • Records for each employee specifying the nature of any disciplinary transgressions, the actions taken by the employer and the reasons for the actions • Record of the prescribed details of any strike, lock-out or protest action involving its employees • Records that an employer is required to keep in compliance with any applicable: <ul style="list-style-type: none"> ○ Collective agreement; ○ Arbitration award; and ○ Determination made in terms of the Wage Act. 	The Labour Relations Act 66 of 1995
PAIA Manual	Promotion of Access to Information Act 2 of 2000
POPIA Manual	Protection of Personal Information Act 4 of 2013

10. DESCRIPTION OF THE SUBJECTS ON WHICH GALLAGHER RE HOLDS RECORDS AND CATEGORIES OF RECORDS HELD ON EACH SUBJECT

10.1 The below table provides subjects, in respect of which Gallagher Re holds records and the categories of records held on each subject.

10.2 Please note that to access records described below, you must follow the procedure for making a request under POPIA/PAIA as set out in section 12.

10.3 If you make a request to access the below records, Gallagher Re may deny your request where Gallagher Re is allowed to do so under PAIA and POPIA. For more detail on the potential grounds for refusal please consult section 12.3.

Subjects on which Gallagher Re holds records	Categories of records
Reinsurance ¹	<ul style="list-style-type: none"> Records generated by or within Gallagher Re relating to its clients; Records provided by a third party (typically insurer or reinsurer) in respect of the client; Records provided by a client to a third party acting for or on behalf of Gallagher Re; Reinsurance contract information (e.g. start & end dates, cover, premium, individual terms); Due diligence information; Claims history; Mid-term adjustments; Reasons for cancellation; Risk profile; Financial information; Third party records; Data for processing premium and claims; and Financial and catastrophe models.
Operations	<ul style="list-style-type: none"> Operational records; Administrative records; Day-to day business operations information; Third party records; Internal policies and procedures; and Statutory record.
Finance	<ul style="list-style-type: none"> Financial records; Contractual records; Budget information; Third party records; Financial transactions; and Payment terms.
IT	<ul style="list-style-type: none"> IT-related records (e.g. username, password, history of usage of information and communications devices, services and systems); IT third party records; IT system event records; and IT equipment fault history.
Communications	<ul style="list-style-type: none"> Communication; Third party records; and

¹ We will not provide records that will reveal the identity of our clients.

Subjects on which Gallagher Re holds records	Categories of records
	<ul style="list-style-type: none"> Reference material used in communications.
Legal/Compliance	<ul style="list-style-type: none"> Finalised litigation records; Third party records; and Compliance certification including compliance with FSCA).
Human Resources	<ul style="list-style-type: none"> Training schedules and material; Personal records provided by personnel; Payroll records; Conditions of employment and other personnel related records; Disciplinary records; Third party records; Employee performance records; Insured benefits; and Correspondence relating to personnel.
Sales and RFP management	<ul style="list-style-type: none"> Information relating to Sales & Bid Management activities; Third party records; and RFPs.

11. PROCESSING OF PERSONAL INFORMATION

11.1 This section directs you to our privacy notices (see sections 11.2, 11.3 and 11.4) in which you can find further information about our processing of your information in accordance with section 18 of POPIA. More specifically, our privacy notices provide you with information regarding the:

- Purpose of processing personal information;
- Description of the categories of data subjects and of the related information or categories of information;
- The recipients or categories of recipients to whom the personal information may be shared;
- Planned transborder flows of personal information; and
- General description of Information Security Measures to be implemented by the responsible party to ensure the confidentiality, integrity and availability of the information.

11.2 Please find information regarding the processing of personal information in our [Global Privacy Notice](#) if you are a business contact, website user or an individual;

- in respect of (re)insurance policies we place;
- entering competitions or promotions, requesting marketing information, making general enquiries
- whose images we use in marketing or
- who is captured on CCTV

- 11.3 If you are a prospective, present or past employee, contractor, secondee, agency staff or work placement you can find information regarding the processing of personal information in our Global Employee Privacy Notice. The Global Employee Privacy Notice is accessible through the applicable HR online platform and Gallagher One.
- 11.4 If you are a job applicant or potential job applicant, you can find information regarding the processing of personal information in the Data Privacy Statement for Job Applicants which can be found on our [job portal](#).

Please note that it is not mandatory to provide your personal information however, as a result, we will be unable to employ you as an employee or provide reinsurance services.

12. PROCEDURE FOR MAKING A REQUEST UNDER PAIA / POPIA

12.1 How can I make a request to Gallagher Re under PAIA/POPIA?

- 12.1.1 If you wish to access records held by Gallagher Re or wish to access, correct, delete or object to the processing of your personal information, you will need to:

- 1) Complete the relevant Request Form which can be downloaded separately from <https://infoeregulator.org.za/>

For ease of reference and your convenience, the following forms have been attached to this manual:

- a) **Appendix 1:** PAIA Request for Access to Record;
 - b) **Appendix 2:** PAIA Outcome of Request and of Fees Payable;
 - c) **Appendix 3:** Objection to the Processing of Personal Information in terms of section 11(3) of POPIA; or
 - d) **Appendix 4:** Request for Correction or Deletion of Personal Information or, Destruction or Deletion of Record of Personal Information.
- 2) Submit the completed Request Form (Appendix 1, 2 or 3) by:
 - a) Emailing a scanned PDF of the completed Request Form to: GlobalPrivacyOffice@ajg.com
 - b) Posting the completed Request Form to:

The Information Officer
Gallagher Re (Pty) Limited
P.O Box 411775, Craighall, 2024
 - c) Pay the applicable Request Fee described in section 12.5 below. Payment can be made via:
 - Bank guaranteed cheque or postal order written to Gallagher Re; or
 - EFT (direct bank transfer). If you wish to pay the applicable Request Fee via EFT, you will need to send the proof of payment together with your request. you

can obtain the details required for EFT by contacting Gallagher Re (see section 5 above for contact details).

Unfortunately, Gallagher Re cannot accept payment via credit card or debit card.

12.1.2 Please note that your request will not be processed until the applicable Request Fee is paid (see section 12.5 below).

12.1.3 If you are unable to complete the Request Form (e.g. if you don't know how to write / type or if you have a disability that prevents you from completing the Request Form), please contact Gallagher Re by telephone at +2782 903 7697.

12.1.4 When you complete the Request Form, please be sure to complete the form as fully as you can. Please note that Gallagher Re will not be able to process your request unless:

- 1) You provide sufficient particulars to enable Gallagher Re to:
 - a) Identify you;
 - b) Identify the records / personal information in question; and
 - c) Ascertain the nature of your request and the form or manner in which you require access.
- 2) If you are making a request under PAIA, sufficient explanation regarding the right you seek to exercise or protect, including a clear explanation as to why you feel that the records you request are required to exercise or protect that right; and
- 3) If you are making a request on behalf of another person, proof of the capacity in which you are authorised to make the request.

12.2 How will my PAIA / POPIA request be processed by Gallagher Re?

12.2.1 Gallagher Re will process your request when the completed Request Form is received and any applicable Request Fee is paid. Subject to the below conditions, your request will normally be processed within 30 days of receipt of the completed Request Form and Request Fee, provided that all of the required details are properly set out in the completed Request Form.

12.2.2 If it turns out that it will take more than 30 days to process your request (e.g. due to the volume of records / personal information that must be processed, or difficulty in accessing the relevant record / personal information), Gallagher Re may extend the aforementioned 30 day period in processing your request. Should this become necessary, Gallagher Re will notify you.

12.2.3 Once a decision on your request is reached, Gallagher Re will notify you in writing. Where Gallagher Re decides to:

- 1) Grant access to the record / personal information requested, Gallagher Re will notify you how the access will be granted and what Access Fees are payable,

and release the requested record / personal information upon receipt of the applicable Access Fee;

- 2) Deny access to the record / personal information requested, Gallagher Re will notify you of the reasons why access is denied;
- 3) Comply with your request to correct or delete your personal information, confirm how your request has been or will be actioned; or
- 4) Deny your request to correct or delete your personal information, confirm why your request has been denied.

12.2.4 Where your request was a request for confirmation as to whether or not Gallagher Re handles your personal information (i.e. you make a request under POPIA s23(1)(a)), Gallagher Re will give you the confirmation.

12.3 What potential grounds for refusal does Gallagher Re have?

12.3.1 If you make a request to access records / personal information held by Gallagher Re, Gallagher Re may deny your request where Gallagher Re is allowed to do so under PAIA. This could be the case, for example, where your request:

- 1) Results in unreasonable disclosure of personal information about another individual including a deceased individual;
- 2) Results in disclosure of trade secrets, research information, or financial, commercial, scientific, technical, or other confidential information of Gallagher Re or a third party;
- 3) Could reasonably be expected to result in endangerment of the life or physical safety of any individual;
- 4) Is likely to prejudice or impair the security or safety of any property or the public; or
- 5) Results in breach of legal privilege, unless the person entitled to the privilege has waived the privilege;
- 6) Its disclosure would constitute an action for breach of a duty of confidence owed to a third party in terms of an agreement;
- 7) The request is clearly frivolous or vexatious

12.3.2 If you make any other request in respect of your personal information, such as a request to correct / delete your personal information, Gallagher Re may deny your request where Gallagher Re is allowed to do so under POPIA. This would typically be the case where POPIA allows Gallagher Re to handle your personal information in a particular way, and Gallagher Re would otherwise be prevented from providing its services.

12.4 What if I'm not happy about how Gallagher Re handled my PAIA / POPIA request?

12.4.1 If you are not satisfied about the way in which your request was handled by Gallagher Re (including where you are not happy about the Access Fee charged by Gallagher Re or the length of time Gallagher Re is taking to process your request), you can make an application for relief to the Constitutional Court, the High Court or another court of similar status.

12.4.2 Please note that if you wish to make an application to the court, you will need to do so within 180 days of receiving the relevant decision made by Gallagher Re.

12.5 What are the charges applicable to my PAIA / POPIA request?

12.5.1 There are two types of fees which are payable under PAIA, namely Request Fee and Access Fee.

12.5.2 Request Fee is payable upon making a request to access records / personal information, and it is R57 (inclusive of VAT)² for each request. You do not have to pay a Request Fee if:

- 1) You are a private individual requesting access to your own records / personal information;
- 2) You are single and earning less than R14,812 p/a; or
- 3) You are married (or in a life partnership), and earning less than R27,192 p/a.

12.5.3 Access Fee is payable in respect of records/ personal information which are produced in response to your request. Access Fee is payable by everyone who makes a request.

12.5.4 The rate of Access Fees are as follows:

Type of activity involved in producing the record or personal information	Rate (incl. VAT) ³
For every photocopy of an A4-size page or part thereof.	R1.25
For every printed copy of an A4-size page or part thereof. Held on a computer or in electronic or machine readable form.	R0.86
For a copy in a computer-readable form on stiffy disk.	R8.55
For a copy in a computer-readable form on CD.	R79.80
For a transcription of visual images, for an A4-size page or part thereof.	R45.60
For a copy of visual images.	R68.40

² This fee is subject to amendment without notice.

³ These fees are subject to amendment without notice.

For a transcription of an audio record, for an A4-size page or part thereof.	R22.80
For a copy of an audio record.	R34.20
Each hour or part of an hour (excluding the first hour) reasonably required to search for and prepare the record/personal information for disclosure.	R34.20
For posting the record/personal information.	Actual postage incurred
For confirming whether or not Gallagher Re handles personal information of the requestor (POPIA s23(1)(a) request)	Free of charge

12.5.5 Please note that:

- 1) Where Request Fee is payable, your request will not be processed until you pay the Request Fee; and
- 2) Where Access Fee is payable, the record / personal information you requested will not be released until the Access Fee is paid.

12.5.6 Please also note that if you are not a private individual and if the search for and preparation of the record requested is in Gallagher Re's view likely to require more than 6 hours of work, Gallagher Re reserves the right to require you to pay one-third of the Access Fee up front as a deposit.

13. AVAILABILITY OF THE MANUAL

13.1 A copy of the Manual is available-

- 1) On (<https://www.ajg.com/gallagherre/legal-regulatory-information/>);
- 2) Head office of the Gallagher Re for public inspection during normal business hours (see section 5.6 for contact details);
- 3) To any person upon request and upon the payment of a reasonable prescribed fee; and
- 4) To the Information Regulator upon request.

13.2 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.

14. UPDATING OF THE MANUAL

CEO of Gallagher Re will on a regular basis update this manual to reflect changes in laws and regulations, or changes in Gallagher Re's business operation.

Issued by



Natalie van de Coolwijk

CEO of Gallagher Re (Pty) Limited

APPENDIX 1: PAIA FORM 2 - REQUEST FOR ACCESS TO RECORD

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 (when made on behalf of another person)			
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 (if applicable):			
Identity Number			
Postal Address			
Street Address			



E-mail Address			
Contact Numbers	Tel. (B)		Facsimile
	Cellular		
<p align="center">PARTICULARS OF RECORD REQUESTED</p> <p><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></p>			
Description of record or relevant part of the record:			
Reference number, if available			
Any further particulars of record			
<p align="center">TYPE OF RECORD</p> <p align="center"><i>(Mark the applicable box with an "X")</i></p>			
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 <i>(Mark the applicable box with an "X")</i>	
Printed copy of record <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 record on flash drive <i>(including virtual images and soundtracks)</i>	
Copy of record on compact disc drive <i>(including virtual images and soundtracks)</i>	
Copy of record saved on cloud storage server	

MANNER OF ACCESS <i>(Mark the applicable box with an "X")</i>	
Personal inspection of record 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>	
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>	

PARTICULARS OF RIGHT TO BE EXERCISED OR PROTECTED <i>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.</i>	
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:	

FEES	
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 (Please specify)

Signed at _____ this _____ day of _____ 20 _____

Signature of Requester / person on whose behalf request is made

FOR OFFICIAL USE

Reference number:	
Request received by: (State Rank, Name And Surname of Information Officer)	
Date received:	
Access fees:	
Deposit (if any):	

Signature of Information Officer

APPENDIX 2: PAIA FORM 3 – OUTCOME OF REQUEST AND OF FEES PAYABLE

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 (*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*) 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.

OR

2. You requested:

Printed copies of the information (*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 information on flash drive (*including virtual images and soundtracks*)

Copy of information on compact disc drive (*including virtual images and soundtracks*)

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 (*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)

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	R60.00		
• If provided to the requestor			
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	R60.00		
• If provided to the requestor			
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

APPENDIX 3: POPIA FORM 1 - OBJECTION TO THE PROCESSING OF PERSONAL INFORMATION

FORM 1 OBJECTION TO THE PROCESSING OF PERSONAL INFORMATION IN TERMS OF SECTION 11(3) OF THE PROTECTION OF PERSONAL INFORMATION ACT, 2013 (ACT NO. 4 OF 2013)

REGULATIONS RELATING TO THE PROTECTION OF PERSONAL INFORMATION, 2018 [Regulation 2]

Note:

1. Affidavits or other documentary evidence as applicable in support of the objection may be attached.
2. If the space provided for in this Form is inadequate, submit information as an Annexure to this Form and sign each page.
3. Complete as is applicable.

A	DETAILS OF DATA SUBJECT
Name(s) and surname/ registered name of data subject:	
Unique Identifier/ Identity Number	
Residential, postal or business address:	
	Code ()
Contact number(s):	
Fax number / E-mail address:	
B	DETAILS OF RESPONSIBLE PARTY
Name(s) and surname/ Registered name of responsible party:	
Residential, postal or business address:	
	Code ()
Contact number(s):	
Fax number/ E-mail address:	
C	REASONS FOR OBJECTION IN TERMS OF SECTION 11(1)(d) to (f) (Please provide detailed reasons for the objection)



Gallagher

Insurance | Risk Management | Consulting

Signed at this day of20.....

..... *Signature of*
data subject/designated person

APPENDIX 4: POPIA FORM 2 - REQUEST FOR CORRECTION OR DELETION OF PERSONAL INFORMATION

REQUEST FOR CORRECTION OR DELETION OF PERSONAL INFORMATION OR DESTROYING OR DELETION OF RECORD OF PERSONAL INFORMATION IN TERMS OF SECTION 24(1) OF THE PROTECTION OF PERSONAL INFORMATION ACT, 2013 (ACT NO. 4 OF 2013)

REGULATIONS RELATING TO THE PROTECTION OF PERSONAL INFORMATION, 2018 [Regulation 3]

Note:

1. *Affidavits or other documentary evidence as applicable in support of the request may be attached.*
2. *If the space provided for in this Form is inadequate, submit information as an Annexure to this Form and sign each page.*
3. *Complete as is applicable.*

Mark the appropriate box with an "x".

Request for:

- ☐ Correction or deletion of the personal information about the data subject which is in possession or under the control of the responsible party.
- ☐ Destroying or deletion of a record of personal information about the data subject which is in possession or under the control of the responsible party and who is no longer authorised to retain the record of information.

A	DETAILS OF THE DATA SUBJECT
Name(s) and surname / registered name of data subject:	
Unique identifier/ Identity Number:	
Residential, postal or business address:	
	Code ()
Contact number(s):	
Fax number/E-mail address:	
B	DETAILS OF RESPONSIBLE PARTY
Name(s) and surname /	



registered name of responsible party:	
Residential, postal or business address:	
	Code ()
Contact number(s):	
Fax number/ E-mail address:	
C	INFORMATION TO BE CORRECTED/DELETED/ DESTROYED/ DESTROYED
D	REASONS FOR *CORRECTION OR DELETION OF THE PERSONAL INFORMATION ABOUT THE DATA SUBJECT IN TERMS OF SECTION 24(1)(a) WHICH IS IN POSSESSION OR UNDER THE CONTROL OF THE RESPONSIBLE PARTY ; and or REASONS FOR *DESTRUCTION OR DELETION OF A RECORD OF PERSONAL INFORMATION ABOUT THE DATA SUBJECT IN TERMS OF SECTION 24(1)(b) WHICH THE RESPONSIBLE PARTY IS NO LONGER AUTHORISED TO RETAIN. <i>(Please provide detailed reasons for the request)</i>

Signed at this day
of.....20.....

.....
Signature of data subject/ designated person