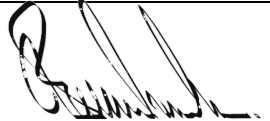


PROMOTION OF ACCESS TO INFORMATION ACT (ACT 2 OF 2000) SECTION 51 MANUAL

FSP NAME	Groups Are Us (Pty) Ltd
FSP NUMBER	45735
FSP ENTITY	Credit Life and Funeral Cover Insurance
PHYSICAL ADDRESS	Groups Are Us Building 34 Newton Street Newton Park Gqeberha 6055
TELEPHONE NO	041 004 0114
POLICY DATE	15 April 2025
AUTHOR	Caitlin Williams

Policy Revision & Authorisation			
Name: Department head, Manager and/or Representative	Designation	Approval Date	Approval Signature
Andre van Tonder	Director/Dept Head Manager/Representative	15 April 2025	

Note: Signature herewith the department head, line manager or department representative confirms that process disclosed in this SOP is followed and monitored accordingly. When audited by compliance, provision will be made to also ensure and enhance minimum compliance and/or regulatory requirement standards are amended and met.

Annual Audit Revision: Compliance			
Name:	Designation	Approval Date	Approval Signature
	Compliance Officer/Administrator	____ / ____ / ____	

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1. DEFINITIONS

- a) **IO**
Is an abbreviation and refers to an Information Officer.
- b) **Records**
A thing constituting a piece of evidence about the past, especially an account kept in writing or some other permanent form.
- c) **GRU**
Is an abbreviation and refer to Groups Are Us (Pty) Ltd.
- d) **FAIS**
Is an abbreviation and refers to the Financial Advice and Intermediary Services Act.
- e) **PAIA**
Is an abbreviation and therefore refers to the Promotion of Access To Information Act, (Act 2 of 2000).
- f) **Information Regulator**
An independent body established in terms of section 39 of the Protection Information Act 4 of 2013.
- g) **Private Body**
 - i. A natural person who carries or has carried on any trade, business, or profession.
 - ii. A partnership who carries or has carried on any trade, business, or profession.
 - iii. Any former or existing juristic person.
 - iv. A political party.
 - v. But excludes a public body.
- h) **Legal Provisions**
All statutes, laws, ordinances, rules, regulations, judgments, orders, and decrees of any governmental entity.
- i) **Requester**
A person acting on behalf of a private or public body making a request for access to a record(s).
- j) **Public Body**
Any department of state or administration in the national or provincial sphere of government.
- k) **SAHRC**
Is an abbreviation and refers to the South African Human Rights Commission.

2. PURPOSE

The Act's purpose is to uphold the principles of transparency, accountability, efficient governance within both public and private entities. It is imperative to implement measures that facilitate easy access to information.

Such measures not only empower members of the public, Groups R Us and the staff members to engage in effective scrutiny and decision-making processes. To foster an environment of openness is essential, thereby encouraging proactive disclosure of information. To achieve these goals in mind, it is necessary to establish both voluntary and mandatory mechanisms or procedures that streamline the right of access to information, ensuring its prompt, cost effective and user-friendly to all stakeholders involved.

3. INTRODUCTION

This entity, Groups Are Us (Pty) Ltd T/a Groups R Us, is an authorised financial services provider that provides financial advice and renders intermediary services to clients on financial products under a license issued in terms of the Financial Advisory and Intermediary Services Act, Act 37 of 2002.

This manual has been designed to serve as a guide for individuals who wish to understand their rights under the Promotion of Access to Information Act and the procedures involved at Groups R Us in accessing information. This manual details the responsibilities of our organisation concerning information requests,

outlines the essential contact information for our designated Information Officer, and categories the various types of records that we maintain.

By making this information readily accessible, we aim to empower individuals to engage more fully within our organisation and the services we provide. Our commitment to transparency is rooted in the belief that informed citizens are vital to the functioning of a good governance.

GRU has proactively adopted Microsoft 365 to facilitate the sharing of information through both a centralised and local system. This transition is crucial as it not only streamlines communication and collaboration across the organisation but also ensures that all data is monitored and protected by our dedicated IT Team. With regular updates and vigilant oversight, we are committed to safeguarding sensitive information, thereby reinforcing our responsibility to maintain data security and integrity. This strategic move is essential in fostering a secure environment where information can be shared efficiently while upholding our commitment to confidentiality and trust.

The Information Officer of a credit provider is required by law to be registered with the information regulator. This registration is significant because the IO is recognised as the official point of contact and the individual held accountable for all matters related to information management and compliance within the organisation.

To facilitate this registration, the process is conducted through the Information Regulator's online registration portal. The portal can be accessed at the following address: <https://registrations.inforegulator.org.za/login>. The IO is the person tasked with the crucial responsibility of overseeing the company's compliance with the Promotion of Access to Information Act (PAIA).

The registration is not merely a formality; it is a requirement stipulated in Section 32 of the Act, which underscores the importance of having a dedicated point of accountability within the organisation.

Through this process, the IO ensures that the organisation adheres to its legal obligations, fostering trust with stakeholders and promoting a culture of openness regarding information sharing.

We encourage all members of the company to take the time to familiarise themselves with this manual. By understanding their rights and the mechanisms in place for accessing information, individuals can play an active role in promoting transparency and accountability within our company and society.

4. RIGHT OF ACCESS TO RECORDS

A requester must be given access to a record of a public body if –

- a) They comply with all the procedural requirements outlined in the Act for making a request.
- b) Access is not refused based on any grounds for refusal detailed in chapter 4 of the Act.
- c) Section 11 of the Act clarifies that the right to request access does not extend to records containing personal information about the requester.
- d) The requester's right of access is not affected by the beliefs of the information officer regarding the requester's reasons for access and any reasons they provide for requesting access.

5. AUTOMATIC AVAILABILITY OF RECORDS

The IO of a public body, referred to in the definitions of a "public body" in section 1, must make available in the prescribed form and manner a description of-

- a) Delineates the categories of records that are readily accessible, including:
 - i. Records available for inspection under other legislation apart from the specified act.
 - ii. Records are available for purchase or copying directly from the public body.
 - iii. Records that the public body provides free of charge.
- b) Provides guidance on how individuals can access these records, detailing the procedures or channels through which they can make inquiries or requests for access.
- c) A record belonging to Groups R Us, as defined by the legislation in Part 1 of the Schedule, is considered an official document that we are required to maintain and manage. This classification

ensures that these records, which may include meeting minutes, reports, and correspondence, are subject to established regulations and protocols.

6. RECORDS AVAILABLE AT NO COST

The latest notice regarding the categories of records of the body, which are available without a person having to request access in terms of section 52 (2) of this Act, and at no cost are:

- a) Websites
- b) Flyers
- c) Brochures
- d) Pamphlets
- e) Documents relating to business activities.

7. ACCESSIBILITY OF DOCUMENTS UNDER OTHER LEGAL PROVISIONS

GRU makes constant effort to train and develop their staff with the necessary tools to abide by the Act, therefore, we have included a list of legislation where records are available should an employee request access to view this document:

- a) Basic Conditions of Employment Act No. 75 of 1997
- b) Collective Investments Schemes Control Act No. 45 of 2002
- c) Companies Act No. 71 of 2008
- d) Compensation for Occupational Injuries and Health Diseases Act No. 130 of 1993
- e) Consumer Protection Act No. 68 of 2008
- f) Employment Equity Act No. 55 of 1998
- g) Financial Advisory and Intermediary Services Act No. 37 of 2002
- h) Financial Intelligence Centre Act No. 1 of 2017
- i) Financial Institutions (Protection of Funds) Act No. 28 of 2001
- j) Financial Services Board Act No. 97 of 1990
- k) Financial Services Ombud Schemes Act No. 37 of 2004
- l) Friendly Societies Act No. 25 of 1956
- m) Income Tax Act No. 58 of 1962
- n) Insurance Laws Amendment Act No. 27 of 2008
- o) Labour Relations Act No. 66 of 1995
- p) Long-term Insurance Act No. 52 of 1998
- q) Occupational Health and Safety Act No. 85 of 1993
- r) Prevention of Organised Crime Act No. 121 of 1998
- s) Protection of Constitutional Democracy against Terrorist and Related Activities Act No. 33 of 2004
- t) Skills Development Act No. 97 of 1998
- u) Unemployment Contributions Act No. 4 of 2002
- v) Unemployment Insurance Act No. 63 of 2001
- w) Value Added Tax Act No. 89 of 1991

8. RECORDS WHICH MAY BE REQUESTED

The following records may be requested in various departments:

8.1 Administrative Department

- a) License of product categories
- b) Minutes of management meeting
- c) Correspondence

8.2 Human Resources

- a) Employment Contracts
- b) Mandates

- c) Policies and Procedures
- d) Training
- e) Remuneration and benefits policies and records thereof
- f) Record of absenteeism and disciplinary actions

8.3 Operations/Compliance

- a) Production records
- b) Compliance manual – FAIS
- c) Compliance reports
- d) Complaints procedures
- e) Contractual agreements with suppliers
- f) Procedures manuals – FICA
- g) Record of advice
- h) Register of Key Individuals
- i) Register of Representatives
- j) Register of non-compliance
- k) Record of continued compliance by representatives
- l) Register of premature cancellation of products
- m) Clients register.

8.4 Finance

- a) Accounting records
- b) Audit records
- c) Financial statements
- d) Assets inventory

9. HOW TO UTILIZE THE ACT

The Information Regulator must update and make available the existing guide that has been compiled by the South African Human Rights Commission or can be accessed on their website. The details are as follows:

Postal Address	The South African Human Rights Commission- PAIA Unit The Research and Documentation Department Private Bag 2700 Houghton 2041
Telephone Number	011 877 3600
Fax Number	011 403 0625
Email Address	paia@sahrc.org.za lidlamini@sahrc.org.za
Website	www.sahrc.org.za

10. GUIDE

The Information Regulator is required to update and provide the existing guide created by the South African Human Rights Commission in a clear and accessible format for individuals wishing to exercise their rights under this Act and the Protection Of Personal Information Act, 2013. Groups R Us must make a manual available in terms of subsection (3) containing the below details:

Name of business	Groups Are Us (Pty) Ltd t/a Groups R Us (Pty) Ltd
Designated contact person	Compliance Department
Physical address	34 Newton Street Newton Park Gqeberha Eastern Cape 6045
Postal address	34 Newton Street Newton Park Gqeberha Eastern Cape 6045
Telephone number	086 127 3342
Email address	compliance@groupsrus.co.za

11. PAIA MANUAL

The manual is available for inspection at the offices of the relevant private body free of charge. Copies are also available with the SAHRC and on the private body's website (if any).

ANNEXURE A – REQUEST FOR ACCESS OF RECORDS OF GROUPS R US (PTY) LTD

Details of private body:

Groups Are Us (Pty) Ltd t/a Groups R Us (Pty) Ltd – FSP 45735

Details of person requesting access to the record:

Instructions: • The particulars of the person who requests access to the record must be given below. • The address and/or fax number in the Republic to which the information is to be sent must be given. • Proof of the capacity in which the request is made, if applicable, must be attached.	
Full name and surname	
Identity number	
Postal address	
Telephone number	
Fax number	
Email address	
Capacity in which request is made, when made on behalf of another person	

Particulars of person on whose behalf the request is made:

Instructions: This section must be completed ONLY if a request for information is made on behalf of another person.	
Full name and surname	
Identity number	

Particulars of record:

Instructions: • 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 a separate folio and attach it to this form. The requester must sign all the additional folios.
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Description of record or relevant part of the record	
Reference number, if available	
Any further particulars of record	

Fees:

Instructions: • A request for access to a record, other than records containing personal information about you, will be processed only after a request fee has been paid. • You will be notified of the amount required to be paid as the request fee. • 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. • If you qualify for exemption of the payment of any fee, please state the reason for exemption.	
Reason for exemption from payment of fees	

Form of access to record:

Instructions: If you are prevented by a disability to read, view or listen to the record in the form of access provided for in 1 to 4 hereunder, state your disability and indicate in which form the record is required.	
Disability	
Form in which record is required	
Instructions: - Mark the appropriate box with an X - Compliance with your request in the specified form may depend on the form in which the record is available. - Access in the form requested may be refused in certain circumstances. In such a case you will be informed if access will be granted in another form. - The fee payable for access to the record, if any, will be determined partly by the form in which access is requested.	
1. If the record is in written or printed form: ☐ Copy of record ☐ Inspection of record	
2. If record consists of visual images (this includes photographs, slides, video recordings, computer-generated images, sketches etc): ☐ View images ☐ Copy of images ☐ Transcription of images	
3. If record consists of recorded words or information which can be reproduced in sound: ☐ Listen to soundtrack (audio cassette) ☐ Transcription of images	
4. If record is held on computer or in an electronic or machine-readable form: ☐ Printed copy ☐ Printed copy of information derived from record ☐ Copy in computer-readable form (stiffy or compact disc)	

* If you requested a copy or transcription of a record (above), do you wish the copy or transcription to be posted to you?

YES

NO

Postage is payable.

Particulars of right to be exercised or protected:

Instructions:

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

Indicate which right is to be exercised or protected.

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

Notice of decision regarding request for access:

You will be notified in writing whether your request has been approved / denied. If you wish to be informed in another manner, please specify the manner and provide the necessary particulars to enable compliance with your request.

How would you prefer to be informed of the decision regarding your request for access to the record?

Signed at _____ on this _____ day of _____ 20 _____

Full Name of Requester

(Person on whose behalf the request is made)

Signature of Requester

(Person on whose behalf the request is made)

ANNEXURE B – FEES IN RESPECT OF PRIVATE BODIES

1. The fee for a copy of the manual as contemplated in regulation 9(2) (c) is R1.10 for every photocopy of an A4-size page or part thereof.	
2. The fees for reproduction referred to in regulation 11(1) are as follows:	R0.00
a. For every photocopy of an A4-size page or part thereof	1.10
b. For every printed copy of an A4-size page or part thereof held on a computer or in electronic or machine-readable form	0.75
c. For a copy in a computer-readable form on:	7.50
i. Stiffy disc	
ii. Compact disc	70.00
d. For a transcription of visual images:	40.00
i. A4 size page or part thereof	
ii. A copy of visual images	60.00
e. For a transcription of an audio record:	20.00
i. A4 size page or part thereof	
ii. A copy of an audio record	30.00
3. The request fee payable by a requester, other than a personal requester, referred to in regulation 11(2) is R50,00	
4. The access fees payable by a requester referred to in regulation 11(3) are as follows:	R0.00
a. For every photocopy of an A4-size page or part thereof	1.10
b. For every printed copy of an A4-size page or part thereof held on a computer or in electronic or machine-readable form	0.75
c. For a copy in a computer-readable form on:	7.50
i. Stiffy disc	
ii. Compact disc	70.00
d. For a transcription of visual images:	40.00
i. A4 size page or part thereof	
ii. A copy of visual images	60.00
e. For a transcription of an audio record:	20.00
i. A4 size page or part thereof	
ii. A copy of an audio record	30.00
For purposes of section 54(2) of the Act, the following applies:	

(a) Six hours as the hours to be exceeded before a deposit is payable; and
(b) One third of the access fee is payable as a deposit by the requester. The actual postage is payable when a copy of a record must be posted to a requester.

DOC VERSION AND CHANGE TRACKING:

- Must be completed by last author/reviewer of document.

Seq No:	Date of review	Version Reviewed	New Version	Short note of critical changes	Author/Reviewer Name
1	2021	Non existent	V 1.0	Base Policy to Ensure operational ability.	Andre van Tonder
2	2022	V 1.0	V 2.0	Optimisation of Version 1.0	Andre van Tonder
3	2023	V 2.0	V 3.0	Optimisation of Version 2.0 (Added version and Index Standards)	Andre van Tonder
4	2024	V 3.0	V 4.0	Optimisation of Version 3.0	Caitlin Williams
5	2025	V 4.0	V 5.0	Optimisation of Version 4.0	Rigert Du Toit
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