



Tial Technologies (Pty) Ltd

PAIA MANUAL

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

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1. LIST OF ACRONYMS AND ABBREVIATIONS

1.1 “**CEO**” Chief Executive Officer

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 Tial Technologies (Pty) Ltd

3.1. Chief Information Officer

Name: Tony Jacobsen (Managing Director)

Tel: +27 (0)11 807 1030

Email: Tony.Jacobsen@Tial.co.za

Fax number: +27 (0)11 807 1034

3.2. Deputy Information Officer *(NB: if more than one Deputy Information Officer is designated, please provide the details of every Deputy Information Officer of the body designated in terms of section 17 (1) of PAIA.*

Name: None

3.3 Access to information general contacts

Email: Anthea.Fousekis@Tial.co.za

3.4 National or Head Office

Postal Address: P.O. Box 3454, Rivonia, 2128

Physical Address: 67 Wessel Road, Rivonia, Bentley Office Park, Block 4, Gauteng, 2128

Telephone: +27 (0)11 807 1030

Email: Anthea.Fousekis@Tial.co.za

Website: <http://www.tial.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 Guide is available in each of the official languages and in braille.
- 4.3. The aforesaid Guide contains the description of
 - 4.3.1. the objects of PAIA and POPIA;
 - 4.3.2. the postal and street address, phone and fax number and, if available, electronic mail address of-
 - 4.3.2.1. the Information Officer of every public body, and
 - 4.3.2.2. every Deputy Information Officer of every public and private body designated in terms of section 17(1) of PAIA and section 56 of POPIA;
 - 4.3.3. the manner and form of a request for-
 - 4.3.3.1. access to a record of a public body contemplated in section 11; and
 - 4.3.3.2. access to a record of a private body contemplated in section 50;
 - 4.3.4. the assistance available from the IO of a public body in terms of PAIA and POPIA;
 - 4.3.5. the assistance available from the Regulator in terms of PAIA and POPIA;
 - 4.3.6. 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-
 - 4.3.6.1. an internal appeal;
 - 4.3.6.2. a complaint to the Regulator; and
 - 4.3.6.3. 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;
 - 4.3.7. 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;
 - 4.3.8. the provisions of sections 15 and 52 providing for the voluntary disclosure of categories of records by a public body and private body, respectively;

- 4.3.9. the notices issued in terms of sections 22 and 54 regarding fees to be paid in relation to requests for access; and
- 4.3.10. the regulations made in terms of section 92.
- 4.4. 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.
- 4.5. The Guide can also be obtained-
 - 4.5.1. upon request to the Information Officer;
 - 4.5.2. from the website of the Regulator (<https://inforegulator.org.za/paia-guidelines/>).
- 4.6 A copy of the Guide is also available in the following two official languages, for public inspection during normal office hours-
 - 4.6.1 (English and Afrikaans)

5. CATEGORIES OF RECORDS OF Tial Technologies (Pty) Ltd WHICH ARE AVAILABLE WITHOUT A PERSON HAVING TO REQUEST ACCESS

NB: Please specify the categories of records held by the body which are available without a person having to request access by completing Form C, types of the records and how the records can be accessed. These are mostly records that maybe available on the website and a person may download or request telephonically or by sending an email or a letter.

Below is an example of the table that can be used.

Category of records	Types of the Record	Available on Website	Available upon request
About Us	Mission Statement, Vision & Values.	X	X
Services	Product Information (SystemA, Automatic Communication, Claims Workflow Automation, Client and Broker Zone, Tial Rating System & General Support).	X	X
Features	Value Added Product Information (Insurance Commissions Management, Claims Management, Premium Collection and Disbursements, Reinsurance Management, Financial Management & Reporting).	X	X
Training	Training approach & link to Online Training website.	X	X
Exec Team	List of executives and their background (Chairman, Business Development Director, Managing Director & Director of Operations).	X	X
Departments	List of departments and their roles (Development, Reporting, Operations, Speciality & Relations).	X	X
Contact Us	Telephone, Email & Physical address.	X	X
Social Media Accounts	Links to Meta (formally known as Facebook), X (formally known as Twitter) & LinkedIn.	X	X

6. DESCRIPTION OF THE RECORDS OF Tial Technologies (Pty) Ltd WHICH ARE AVAILABLE IN ACCORDANCE WITH ANY OTHER LEGISLATION

NB: Please specify all the records which are created and available in accordance with any of the South African legislation. Below is an example of the table that can be used in describing the records and applicable 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
POPI Act Policy – Privacy Notice (Appendix A), Obtaining Consent Policy (Appendix B), Specific Purpose Condition Policy (Appendix C), Ensuring Information Quality Policy (Appendix D) & Consent Notice For Notification To Data Subject (Appendix E)	Protection of Personal Information Act 4 of 2013
Data Destruction Script Policy	Protection of Personal Information Act 4 of 2013

7. DESCRIPTION OF THE SUBJECTS ON WHICH THE BODY HOLDS RECORDS AND CATEGORIES OF RECORDS HELD ON EACH SUBJECT BY Tial Technologies (Pty) Ltd

NB: Describe the subjects (i.e. Finance, SCM or HR), in respect of which the body holds records and the categories of records held on each subject. Below is an example of the table that can be used.

Subjects on which the body holds records	Categories of records
Human Resources	- HR policies and procedures - Advertised posts - Employees records
Administration	- Customer / Client records - Customer / Client invoices and statements
IT	- Customer / Client environment details - Service Provider records - Service Provider invoices and statements

8. PROCESSING OF PERSONAL INFORMATION

8.1 Purpose of Processing Personal Information

NB: Describe the purpose or reasons for processing personal information in your organisation.

We will use Personal and Non-Personal Information only for the purposes for which it was collected or agreed with, for example:

- Setting up services.
- Maintaining and enhancing services.
- Troubleshooting service breakdowns as and when they occur.
- Collect information about the device used to view our website, such as the IP address or the type of Internet browser or operating system used, and link this to the website visitor's Personal Information to ensure that the site presents the best web experience.
- Evaluate the use of the site, products and services.
- For audit and record-keeping purposes.
- For market research purposes.
- For monitoring and auditing website usage.
- Help speed up your future activities and experience on the site.
- In connection with legal proceedings.
- Make the site easier to use and better tailor the site and our products to Customer / Client interests and needs.
- Offer Customers / Clients the opportunity to take part in competitions or promotions.
- Personalise the website experience, as well as evaluate (anonymously and in the aggregate) statistics on website activity, such as what time it was visited, whether it has been visited before, and what site referred the website visitor to it.
- Suggest products or services (including those of relevant third parties) that we think may be of interest to Customers / Clients.
- To assist with business development.
- To carry out our obligations arising from any contracts entered into between Customers / Clients and us.

- To conduct market or customer satisfaction research or statistical analysis.
- To confirm and verify Customers' / Clients' identity or to verify that they are authorized customers for security purposes.
- To contact Customers / Clients regarding products and services which may be of interest to them, provided they have given us consent to do so or they have previously requested a product or service from us, and the communication is relevant or related to that prior request and made within any timeframes established by applicable laws.
- To notify Customers / Clients about changes to our services and products.
- To respond to Customers' / Clients' queries or comments.
- We will also use Personal Information to comply with legal and regulatory requirements or industry codes to which we subscribe, or which apply to us, or when it is otherwise allowed by law.
- Where we collect Personal Information for a specific purpose, we will not keep it for longer than is necessary to fulfil that purpose, unless we must keep it for legitimate business or legal reasons. To protect information from accidental or malicious destruction, when we delete information from our services, we may not immediately delete residual copies from our servers or remove information from our backup systems.
- Customers / Clients can opt out of receiving communications from us at any time. Any direct marketing communications that we send to them will provide them with the information and means necessary to opt out.

8.2 Description of the categories of Data Subjects and of the information or categories of information relating thereto

***NB:** Specify the categories of data subjects in respect of whom the body processes personal information and the nature or categories of the personal information being processed.*

Below is the template that can be used to set out the categories of data subjects and the description of the nature or categories of the personal information to be processed. Note that the nature or categories of the personal information is dependent on the purpose of the body in performing its functions or services.

Categories of Data Subjects	Personal Information that may be processed
Customers / Clients	name, address, registration numbers or identity numbers, employment status, bank details, telephone number and email address
Customers' / Clients' Policy Holders	name, address, registration numbers or identity numbers, employment status, bank details, telephone number, email address, short-term insurance policy and claim information.
Service Providers	names, registration number, vat numbers, address, trade secrets, bank details, telephone number and email address
Employees	address, qualifications, gender, race, telephone number and email address

8.3 The recipients or categories of recipients to whom the personal information may be supplied

***NB:** Specify the person or category of persons to whom the body may disseminate personal information. Below is an example of the category of personal information which may be disseminated and the recipient or category of recipients of the personal information.*

Category of personal information	Recipients or Categories of Recipients to whom the personal information may be supplied
Identity number and names, for criminal checks	South African Police Services
Qualifications, for qualification Verifications	South African Qualifications Authority
Credit and payment history, for credit information	Credit Bureaus
Customers' / Clients' Policy Holder rated items information	Various Underwriter Rating Black Boxes
Customers' / Clients' Policy Holder vehicle information	Imagin8
Dynaco Hosted Customers' / Clients' Policy Holder information	Cloud services vendor (Dynaco – Broad Spectrum Business Solutions)
Electronic / Paper Record Archiving	Metrofile

8.4 Planned transborder flows of personal information

NB: Indicate if the body has planned transborder flows of personal information. For example, some personal information may be stored in the cloud outside the Republic. Please specify the country in which personal information will be stored and categories of personal information.

The personal information referenced under point 8.3 above for Dynaco hosted Customers' / Clients' is stored in the cloud inside of the RSA. The cloud vendor name is Dynaco and they are based in Johannesburg.

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

NB: Specify the nature of the security safeguards to be implemented or under implementation to ensure the confidentiality and integrity of the personal information under the care of the body. This may, for example, include Data Encryption; Antivirus and Anti-malware Solutions.

- Access to information on SharePoint that is readily available to any staff with a PC/laptop and valid AD credentials has been limited to role/function. i.e. Next of kin details and Client environment login details.
- Access to information on Tial Technologies computer systems environment/s (i.e. development environments) will be controlled by function.
- Our Tial Technologies' Employee Policies and Procedures covers:
 - Acceptable usage of personal information;
 - Access to personal information;
 - Computer and network security;
 - Governance and regulatory issues;
 - Investigating and reacting to security incidents.
 - Monitoring access and usage of personal information;
 - Physical security;
 - Retention and disposal of information;
 - Secure communications;
 - Security in contracting out activities or functions;
- When we contract with third parties, we impose appropriate security, privacy and confidentiality obligations on them to ensure that Personal Information that we remain responsible for, is kept secure.
- We will ensure that anyone to whom we pass your Personal Information agrees to treat your information with the same level of protection as we are obliged to.
- SystemA front-end data masking (i.e. simplified data encryption) managed by function using the user access rights module.
- SystemA PDF output (policy schedules/wordings) password protection.
- SystemA data destruction script/policy.
- Webroot Anti-Virus / Anti Malware, Norton Enterprise Anti-Virus/ Anti Malware, Encryption by BitLocker, Monitored by Atera RMM. Two Factor Authentication by DUO on all desktops and servers.

9. AVAILABILITY OF THE MANUAL

9.1 A copy of the Manual is available-

9.1.1 on <http://www.tial.co.za/>, if any;

9.1.2 head office of **Tial Technologies (Pty) Ltd** 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 a **Tial Technologies (Pty) Ltd** will on a regular basis update this manual.

Issued by



(Tony Jacobsen)
(Managing Director)