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different

Hannover Re South Africa  
PAIA and POPI Information Manual

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## Information Manual

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# Information Manual

As prescribed by the provisions of The Promotion Of Access To Information Act, 2000 and The Protection Of Personal Information Act, 2013.

## 1. Purpose of the manual

This Manual

- (a) for the purposes of PAIA, details the procedure to be followed by a Requester and the manner in which a Request for Access will be facilitated; and
- (b) for the purposes of POPIA, amongst other things, details the purpose for which Personal Information may be processed; a description of the categories of Data Subjects for whom the Company Processes Personal Information as well as the categories of Personal Information relating to such Data Subjects; and the recipients to whom Personal Information may be supplied.

## 2. Definitions

- (a) Company means Hannover Re South Africa Limited (“Hannover Re”), registration number 1972/003347/06, a company duly registered and incorporated with limited liability in accordance with the company laws of the Republic of South Africa and having its registered place of business situated at Office Floor 3, Rosebank Towers, 15 Biermann Avenue, Rosebank, Gauteng, Republic of South Africa;
- (b) Conditions for Lawful Processing means the conditions for the lawful processing of Personal Information as fully set out in chapter 3 of POPIA;
- (c) Constitution means the Constitution of the Republic of South Africa, 1996;
- (d) Customer refers to any natural or juristic person that received or receives services from the Company;
- (e) Data Subject has the meaning ascribed thereto in section 1 of POPIA;
- (f) Head of the Company means the “head” as defined in section 1 of PAIA and referred to under the Contact Details in clause 4;
- (g) Information Officer means the Company’s appointed Information Officer as referred to under the Contact Details in clause 4;
- (h) Manual means this manual prepared in accordance with section 51 of PAIA and regulation 4(1) (c) of the POPIA Regulations;
- (i) PAIA means the Promotion of Access to Information Act, 2000;
- (j) Personal Information has the meaning ascribed thereto in section 1 of POPIA;
- (k) Personnel refers to any person who works for, or provides services to or on behalf of the Company, and receives or is entitled to receive remuneration and any other person who assists in carrying out or conducting the business of the Company, which includes, without limitation, directors (executive and non-executive), all permanent, temporary and part-time staff as well as contract workers;
- (l) POPIA means the Protection of Personal Information Act, 2013;
- (m) POPIA Regulations mean the regulations promulgated in terms of section 112(2) of POPIA;
- (n) Private Body has the meaning ascribed thereto in sections 1 of both PAIA and POPIA;
- (o) Processing has the meaning ascribed thereto in section 1 of POPIA;
- (p) Responsible Party has the meaning ascribed thereto in section 1 of POPIA;
- (q) Record has the meaning ascribed thereto in section 1 of PAIA and includes Personal Information;
- (r) Requester has the meaning ascribed thereto in section 1 of PAIA;
- (s) Request for Access has the meaning ascribed thereto in section 1 of PAIA;

Capitalised terms used in this Manual have the meanings ascribed thereto in Section 1 of POPIA and PAIA as the context specifically requires, unless otherwise defined herein.

## 3. Introduction to Hannover Re

Hannover Re is a licensed composite reinsurer. The Company operates as a professional reinsurer and is owned by Hannover Reinsurance Group Africa (Pty) Ltd and is part of the world-wide Hannover Rück SE, based in Hannover Germany, which is one of the largest reinsurance groups in the world.

Hannover Re provides Life & Health and Property & Casualty reinsurance to clients throughout sub-Saharan Africa.

#### 4. Contact details

Head of Company:	Achim Klennert (Chief Executive Officer)
Information Officer:	Susan Atkinson
Physical address:	Office Floor 3, Rosebank Towers, 15 Biermann Avenue, Rosebank, Johannesburg, 2196
Postal address:	PO Box 85321, Emmarentia, 2029
Telephone:	011 481 6500
E-mail:	<a href="mailto:customercare@hannover-re.co.za">customercare@hannover-re.co.za</a>
Website:	<a href="#">Property &amp; Casualty (P &amp; C)</a> and <a href="#">Life &amp; Health (L &amp; H)</a>

#### 5. Who may request access to information

- (a) In terms of PAIA, a Requester is only entitled to request access to a record if the record is required for the exercise or protection of a right.
- (b) Only requests for access to a record, where the Requester has satisfied the Information Officer that the record is required to exercise or protect a right, will be considered.
- (c) A Requester may request access to a record containing personal information about the requester or the person on whose behalf the request is made.
- (d) A public body may request access to a record, but only if the public body is:
  - (i) acting in the interests of the public, and
  - (ii) if the records are required to fulfil or protect any rights other than those of the public body.
- (e) Requesters are [referred to the Guide](#) in terms of Section 10 of PAIA, made available by the Information Regulator, which contains information for the purposes of exercising rights in terms of the Constitution. The contact details of the Information Regulator of South Africa: Postal Address: P.O Box 31533, Braamfontein, Johannesburg, 2017. Telephone Number: +27-10-023-5200. General enquiries: [enquiries@inforegulator.org.za](mailto:enquiries@inforegulator.org.za). Website: <https://inforegulator.org.za/>. Alternatively, you can [request a copy of the guide](#) from the Information Officer of Hannover Re South Africa.

#### 6. Policy with regard to confidentiality and access to information

- (a) Hannover Re will protect the confidentiality of information provided to it by third parties, subject to the Company's obligations to disclose information in terms of any applicable law or a court order requiring disclosure of the information.
- (b) If access is requested to a record that contains information about a third party, the Company is obliged to attempt to contact this third party to inform them of the request. This enables the third party the opportunity of responding by either consenting to the access or by providing reasons why the access should be denied.
- (c) In the event that the third party furnishes reasons for the support or denial of access, the Information Officer will consider these reasons in determining whether access should be granted, or not.

#### 7. Grounds for refusal to grant access to records

The main grounds to refuse a request for information are:

- (a) Mandatory protection of privacy of a third party who is a natural person, which would involve unreasonable disclosure of personal information of that natural person;
- (b) Mandatory protection of the commercial information of a third party, if the record contains trade secrets of that third party; financial, commercial, scientific or technical information which disclosure could likely cause harm to the financial or commercial interest of that third party; information disclosed in confidence by a third party to the institution, if the disclosure could put that third party at a disadvantage in negotiations or commercial competition;
- (c) Mandatory protection of confidential information of third parties if it is protected in terms of any agreement;
- (d) Mandatory protection of the safety of individuals and the protection of property;
- (e) Mandatory protection of records, which would be regarded as privileged in legal proceedings;
- (f) The commercial activities of the Company, including but not limited to: trade secrets of the Company, and certain financial, scientific or technical information which disclosure could likely cause harm to the financial or commercial interests of the Company;
- (g) Requests for information that are clearly frivolous or vexatious, or which involve an unreasonable diversion of resources shall be refused.

#### 8. The request procedure

- (a) The Requester must use the form: [Request for Access](#) to make the request for access to a record. This must be made to the Information Officer. This request must be made to the address or electronic mail address as set out in clause 4 of this Manual.

- (b) The Requester must provide sufficient detail on the request form to enable the Information Officer to identify the record and the Requester.
- (c) The Requester should also indicate which form of access is required in terms of clauses 9 and 10 of this Manual.
- (d) The Requester should also indicate if any other manner is to be used to inform the Requester and state the necessary particulars to be so informed.
- (e) The Requester must identify the right that is sought to be exercised or to be protected and provide an explanation of why the requested record is required for the exercise or protection of that right.
- (f) If a Request is made on behalf of another person, the requester must then submit proof of the capacity in which the requester is making the request to the satisfaction of the Information Officer.
- (g) The requisite fees payable are set out in the [Appendix A - Prescribed fee schedule](#) hereto.

## 9. Categories of records held by the company

- (a) Operational Information  
This is the information relating to the business activities of the company, and includes information such as contracts between the Company and ceding companies and reinsurance brokers, the records of claims and premiums, the relevant slips, cover-notes, and other contractual documents relating to reinsurance treaties and facultative arrangements with insurers, accounting and investment activities, and retrocession arrangements..
- (b) Administration  
This is the information relating to the day-to-day running of the Company, and is generally of little or no use to persons outside the organisation. This information includes items such as the internal telephone lists, address lists, company policies, company contracts, employee records and general “housekeeping” information.
- (c) Communications  
This includes correspondence to and from persons within and without the Company.
- (d) Legal  
The company records required by the Registrar of Companies in terms of the Companies Act, 71 of 2008; the insurance and related records required by the Authorities representing the Prudential Authority and the Financial Services Conduct Authority, as regulated by the Financial Sector Regulation Act, 9 of 2017, and in terms of the:
  - (i) Insurance Act, 18 of 2017;
 The tax records filed in accordance with the:
  - (ii) Income Tax Act, 58 of 1962, and
  - (iii) Value-Added Tax Act, 89 of 1991.
 The human resources and related records required in terms of the:
  - (iv) Unemployment Insurance Act, 63 of 2001;
  - (v) Occupational Health and Safety Act, 85 of 1993;
  - (vi) Labour Relations Act, 66 of 1995;
  - (vii) Basic Conditions of Employment Act, 75 of 1997;
  - (viii) Employment Equity Act, 55 of 1998;
  - (ix) Skills Development Levies Act, 9 of 1999

## 10. Categories of records that are available without request

- (a) Certain records are available without needing to be requested in terms of the request procedures set out in PAIA and provided for in this Manual.
- (b) This information may be inspected, collected, purchased or copied (at the prescribed fee for reproduction) at the Company’s offices; e.g. marketing brochures.
- (c) Certain information is also freely available on the Company’s website.

## 11. Processing of personal information

- (a) The Company needs Personal Information relating to both individual and juristic persons in order to carry out its business and organisational functions.
- (b) The Company is accordingly a Responsible Party for the purposes of POPIA and will ensure that the Personal Information of a Data Subject:
  - (i) is processed lawfully, fairly and transparently. The Company must also have a legal basis (for example, contractual) to process Personal Information;
  - (ii) is processed only for the purposes for which it was collected;
  - (iii) will not be processed for a secondary purpose unless that processing is compatible with the original purpose.

- (iv) is adequate, relevant and not excessive for the purposes for which it was collected;
  - (v) is accurate and kept up to date;
  - (vi) will not be kept for longer than necessary;
  - (vii) is processed in accordance with integrity and confidentiality principles; this includes physical and organisational measures to ensure that Personal Information, in both physical and electronic form, are subject to an appropriate level of security when stored, used and communicated by the Company, in order to protect against access and acquisition by unauthorised persons and accidental loss, destruction or damage;
  - (viii) is processed in accordance with the rights of Data Subjects, where applicable.
- (c) Data Subjects have the right to:
- (i) be notified that their Personal Information is being collected by the Company. The Data Subject also has the right to be notified in the event of a data breach;
  - (ii) know whether the Company holds Personal Information about them, and to access that information. Any request for information must be handled in accordance with the provisions of this Manual;
  - (iii) request the correction or deletion of inaccurate, irrelevant, excessive, out of date, incomplete Personal Information by completing and submitting the prescribed [Objection Form](#) or [Request for Correction or Deletion Form](#) as the case may be;
- (d) The Company may transfer data trans-border in order to store data with third party cloud storage providers.

## 12. Categories of data subjects and their personal information

- (a) Policyholders of Clients – Natural Persons  
Names, date of birth, ID number, nationality, gender, occupation, salary, health information, confidential correspondence.
- (b) Clients – Juristic Persons / Entities  
Names of contact persons, Name of Legal Entity, Physical and Postal address and contact details, Registration Number, Founding documents, Tax related information, authorised signatories.
- (c) Service Providers  
Names of contact persons; Name of Legal Entity, Physical and Postal address and contact details, Registration Number, Founding document, Tax related information, authorised signatories, beneficiaries, ultimate beneficial owners.
- (d) Suppliers  
Names of contact persons; Name of Legal Entity, Physical and Postal address and contact details, Registration Number, Founding document, Tax related information, authorised signatories, beneficiaries, ultimate beneficial owners.
- (e) Employees / Directors  
Gender, Pregnancy, Marital Status, Ethnicity, Age, Language, Education information, Financial Information, Employment History, ID number, Physical and Postal address, Contact details, Criminal behaviour, Well-being.

## 13. Categories of recipients processing the personal information

- (a) The Company, its affiliates and their respective representatives are recipients of Personal Information.
- (b) The Company may supply Personal Information to service providers who render some of the following services:
  - (i) Insurance related services as delegated and / or authorised by the Company;
  - (ii) Capturing and organising of data;
  - (iii) Storing of data;
  - (iv) Sending of emails and other correspondence to clients.

### Version control

Version	Date	Author	Description
V1.0	28 Dec 2021	Susan Atkinson	Document V1
V2.0	01 June 2023	Susan Atkinson	Document V2

## Appendix A - Prescribed fee schedule

- The request fee is payable by every requester unless a valid reason to be exempted from the payment of fees is provided to the Information Officer.
- The Information Officer of the Company must notify the Requester and request the Requester to pay the prescribed fee (if any) before further processing the request.
- The Requester may lodge an [internal appeal](#) or an application to the court against the tender or payment of the request fee.
- After the Information Officer has made a decision on the request, the Requester must be notified in the required form.
- If the Request is granted, then a further access fee must be paid for the search, reproduction, preparation, and for any time that has exceeded the prescribed hours to search and prepare the record for disclosure.

The fees in respect of private bodies, referred to in Annexure B of the Regulations relating to the PAIA, are as follows:

Description	Amount
The request fee payable by every requester	R140.00
Photocopy of A4-size page	R2.00 per page or part thereof.
Printed copy of A4-size page	R2.00 per page or part thereof.
For a copy in a computer-readable form on:	
• Flash drive (to be provided by requester)	R40.00
• Compact disc	
– If provided by requester	R40.00
– If provided to the requester	R60.00
For a transcription of visual images per A4-size page	Service to be outsourced. Will depend on quotations from the service provider.
Copy of visual images	Service to be outsourced. Will depend on quotations from the service provider.
Transcription of an audio record, per A4-size page	R24.00
Copy of an audio record on:	
• Flash drive (to be provided by requester)	R40.00
• Compact disc	
– If provided by requester	R40.00
– If provided to the requester	R60.00
• To search for and prepare the record for disclosure for each hour or part of an hour, excluding the first hour, reasonably required for such search and preparation.	R145.00
• To not exceed a total cost of	R435.00
Deposit: If search exceeds 6 hours	One third of the amount per request calculated in terms of items 2 to 8.
Postage, e-mail or any other electronic transfer	Actual expense, if any.