
Promotion of Access to Information Manual

Aon Limpopo (Pty) Limited

1. Definitions and Interpretation

Aon means Aon Limpopo (Pty) Limited, a subsidiary of Aon South Africa (Pty) Limited.

Associate means in relation to a juristic person which is a company, any subsidiary or holding company of that company, and any other subsidiary of that holding company;

Company means Aon South Africa (Pty) Limited.

Complaint means a matter reported to the Regulator in terms of section 74(1) and (2) of POPIA, (b) a complaint referred to in section 76(1)(e) and 92(1) of POPIA, or (c) a matter reported to the Regulator in terms of other legislation that regulates the mandate of the Regulator.

Complainant means any person who lodges a Complaint with the Regulator.

Conditions for Lawful Processing means the conditions for the lawful processing of Personal Information as fully set out in POPIA and this Manual;

CEO means Chief Executive Officer;

Data Subject has the meaning ascribed thereto in section 1 of POPIA and includes both natural persons and juristic persons;

Day means a calendar day, unless the last day of a specific period happens to fall on a Sunday or on any public holiday, in which case the time shall be calculated exclusive of that Sunday or public holiday in accordance with section 4 of the Interpretation Act, 1957 (Act No. 33 of 1957).

DIO means Deputy Information Officer;

Information Officer (IO) means the person that has been registered as the information officer with the Information Regulator in accordance with POPIA, being the Chief Executive Officer of the company or such other person designated as information officer by the Chief Executive Officer.

Manual means this manual prepared in accordance with section 51 of PAIA;

Office Hours means (a) in respect of offices of the Regulator, means the hours between 08:00 and 16:00 on Monday to Friday, excluding public holidays; and (b) in respect of offices designated by the Regulator, means the hours during which the offices are operating.

PAIA means the Promotion of Access to Information Act 2 of 2000, as amended or replaced from time to time;

Personal Information means information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person, including, but not limited to:

- a) information relating to the race, gender, sex, pregnancy, marital status, national, ethnic or social origin, colour, sexual orientation, age, physical or mental health, well-being, disability, religion, conscience, belief, culture, language and birth of the person;
- b) information relating to the education or the medical, financial, criminal or employment history of the person;
- c) any identifying number, symbol, e-mail address, physical address, telephone number, location information, online identifier or other particular assignment to the person;
- d) the biometric information of the person;
- e) the personal opinions, views or preferences of the person;
- f) correspondence sent by the person that is implicitly or explicitly of a private or confidential nature or further correspondence that would reveal the contents of the original correspondence;
- g) the views or opinions of another individual about the person; and
- h) the name of the person if it appears with other personal information relating to the person or if the disclosure of the name itself would reveal information about the person;

POPIA means the Protection of Personal Information Act 4 of 2013, as amended or replaced from time to time;

POPIA Regulations means the regulations promulgated in terms of section 112(2) of 112(2) of POPIA;

Private Body means:

- a) a natural person who carries or has carried on any trade, business or profession, but only in such capacity;
- b) a partnership which carries or has carried on any trade, business or profession; or
- c) any former or existing juristic person, but excludes a public body;

Processing means any operation or activity or any set of operations, whether or not by automatic means, concerning Personal Information, including-

- a) the collection, receipt, recording, organisation, collation, storage, updating or modification, retrieval, alteration, consultation or use;
- b) dissemination by means of transmission, distribution or making available in any other form; or
- c) merging, linking, as well as restriction, degradation, erasure or destruction of information;

Record of, or in relation to, a Private Body, means any recorded information-

- a) regardless of form or medium;
- b) in the possession or under the control of that Private Body; and
- c) whether or not it was created by that Private Body;

Relevant body/bodies refer to any specific body or class of bodies, or any specific industry profession, or vocation, or class of industries, professions, or vocations that in the opinion of the Regulator which has sufficient representation.

Requester, in relation to a Private Body, means any person, including, but not limited to, a public body or an official thereof, making a request for access to a record of that Private Body; or any person acting on behalf of such person;

Regulator means the Information Regulator;

Request for Access, in relation to a Private Body, means a request for access to a record of a Private Body in terms of section 50 of PAIA;

Responsible Party means a public body or Private Body or any other person which, alone or in conjunction with others, determines the purpose of and means for Processing Personal Information; and

Special Personal Information means Personal Information concerning religious or philosophical beliefs, race or ethnic origin, trade union membership, political persuasion, health or sex life, biometric information and criminal behaviour.

Writing means writing as referred to in section 12 of the Electronic Communication and Transaction Act, 2002 (Act No 25 of 2002).

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.

2. Preamble

PAIA came into operation on 23 November 2001 and POPIA came into effect on 1 July 2020, subject to a 12-month grace period.

Section 51 of PAIA requires Private Bodies to complete a manual which shall facilitate requests for information. Aon is such a Private Body which has compiled a manual, the terms of which are stated below.

The Manual is not exhaustive of, nor does it comprehensively deal with, every procedure provided for in PAIA and POPIA. Requesters are advised to familiarise themselves with the provisions of PAIA and POPIA before making any request to Aon in terms of PAIA and POPIA.

3. Purpose of the PAIA Manual

The purpose of this Manual is to enable the public to check the categories of Records held by Aon and which Records are available without a person having to submit a formal PAIA request. It is also so that the public have an understanding of how to make a request for access to a Record and have access to the relevant contact details of the Information Officer and DIO who will assist the public with the Records they intend to access.

A copy of the Manual is available at [Policies \(aon.co.za\)](https://aon.co.za), at head office (as per physical address provided below) for inspection (during normal business hours), to any person upon request and upon the payment of a reasonable prescribed fee and to the Regulator upon request.

4. Introduction

- 4.1 Aon has compiled this Manual to comply with the provisions of PAIA and POPIA and to ensure that members of the public have effective access to information in Aon's possession which will assist them in exercising and protecting their rights. Where information requested is not immediately available Aon will endeavour to make it available in a timely manner insofar as that is reasonably practicable in the circumstances.
- 4.2 This Manual sets out the procedure to be followed to facilitate a request to access to information as well as the following information:
- 4.2.1 Purpose of the Processing of Personal Information.
 - 4.2.2 Description of the categories of Data Subjects and of the information or categories of information relating thereto.
 - 4.2.3 The recipients or categories of recipients to whom Personal Information may be supplied.
 - 4.2.4 Planned transborder flows of Personal Information.
 - 4.2.5 A general description of the security measures implemented by Aon to ensure the confidentiality, integrity and availability of the information which is to be Processed.

Contact Details

Postal address: PO Box 78367 | Sandton | 2146
Physical address: 30 General Joubert Street | Polokwane | 0699

Telephone numbers:

Telephone number: 0860 100 404 or + 27 15 299 4461
Website address: www.aon.co.za

5. Contact details of the Managing Director, Information Officer and DIOs

Chief Executive Officer: Dr Nolwandle Mgoqi
Telephone number: 0860 100 404
Email address: comments@aon.co.za
The Information Officer: Tanya Prozzi
Telephone number: 0860 100 404
Email address: comments@aon.co.za

In terms of s56 of POPIA and s17(1) of PAIA the Information Officer has further designated DIOs as follows:

DIO: Simon Chambers
Telephone number: 0860 100 404
Email address: comments@aon.co.za
DIO: Carmen Kent
Telephone number: 0860 100 404
Email address: comments@aon.co.za

6. Information Regulator Guide

As of 30 June 2021, the Regulator has taken over the regulatory mandate functions relating to PAIA. This follows a proclamation, by the President, of sections 110 and 114(4) of POPIA which provided for the amendment of PAIA, and the effective transfer of certain functions performed by the South African Human Rights Commission (SAHRC) to the Information Regulator.

The PAIA Guide was developed in fulfilment of the Regulator's obligation under section 10 of the PAIA, which requires the Regulator to update and make available the existing Guide that had been compiled by the SAHRC.

The Guide contains information reasonably required to assist any person who wishes to exercise any right as contemplated in PAIA and has been designed as a guiding, user-friendly and accessible tool. The Guide is available in each official language for inspection at the office of the Regulator, during normal Office Hours or is accessible on the website at <https://infoeregulator.org.za/paia-guidelines/>.

Contact details are as follows:

Post Woodmead North Office Park

54 Maxwell Dr
Woodmead
Johannesburg | 2191

PO Box 31533
Braamfontein
Johannesburg 2017
Telephone: 010 023 5200

Website: <https://infoeregulator.org.za/>
E-mail: enquiries@infoeregulator.org.za

A copy of the Guide is available in English and isiZulu for free public inspection, during normal Office Hours, at Aon's head office. Alternatively, a written request for a free copy of the Guide may be submitted to Aon's Information Officer, whose contact details appear in section 5 above, using the Form located at **Annexure J** to this Manual.

7. Records available under other Legislation

- 7.1 The following information may be available in terms of the following pieces of legislation. Please note this list is not exhaustive.
- 7.2 The information listed below will not in all instances be provided to a Requester who requests them in terms of PAIA as the Requester is required to identify the right the Requester is seeking to exercise or protect and provide an explanation as to why the requested Record is required for the exercise or protection of that right. Furthermore, the request may be denied on the basis of the grounds of refusal under PAIA.

Category of Records	Applicable Legislation
Employment records - each employee's name and occupation; the time worked by each employee; and the remuneration paid to each employee;	Basic Conditions of Employment Act, 1997
Accounting records - information concerning the financial affairs of the Company, including purchase and sales records, general and subsidiary ledgers and other documents and books used in the preparation of financial statements; and copies of all reports presented at the annual general meetings of the Company; and copies of the Company's annual financial statements and accounting records. Constitutional Documents - a copy of the Company's Memorandum of Incorporation, and any amendments or alterations to it, rules of the Company; a record of the Company's current and past directors; CIPC records. Shareholder documents - notices and minutes of all shareholders meetings, including all resolutions adopted by shareholders; and any document that was made available by the Company to the holders of securities in relation to each such resolution; and a copy of the Company's securities register; and copies of any written communications sent generally by the Company to all holders of the Company's securities.	Companies Act, 2008
Director records - minutes of all meetings and director resolutions, or directors' committees, or records of the Company's directors including: full name; identity number or date of birth; nationality and passport number, occupation; date of their most recent election or appointment as director; name and registration number of every other Company or foreign Company of which the person is a director. Company secretarial records - a record of the Company secretaries and auditors, including, in respect of each person appointed as Company secretary or auditor: the name of each such person; and the date of every such appointment; and if a firm or juristic person is appointed: the name, registration number and registered address.	Companies Act, 2008
Sales records - records of each transaction containing the following: the supplier's full name, or registered business name, and VAT registration number, if any; the address of the premises at which, or from which, the goods or services were supplied; the date on which the transaction occurred; a name or description of any goods or services supplied or to be supplied; the unit price of any particular goods or services supplied or to be supplied; the quantity of any particular goods or services supplied or to be supplied; the total price of the transaction, before any applicable taxes; the amount of any applicable taxes; and the total price of the transaction, including any applicable taxes	Consumer Protection Act, 2008

Category of Records	Applicable Legislation
Employment records - records in respect of the Company's workforce, its employment equity plan and any other records relevant to the Company's compliance with the Employment Equity Act, 1998.	Employment Equity Act, 55 of 1998 Code of Good Practice on the Prevention and Elimination of Harassment in the Workplace
Financial records - Information pertaining to clients or prospective clients provided to verify a person's identity; information obtained concerning the nature of the business relationship; the intended purpose of the business relationship; and the source of the funds which the prospective client is expected to use in concluding transactions in the course of the business relationship; records of all transactions concluded in the course of the business relationship with the client, including, without limitation, the amount involved and the currency in which it was denominated; the date on which the transaction was concluded; the parties to the transaction; the nature of the transaction; business correspondence; and where the Company provides account facilities to clients, the identifying particulars of all accounts and the account files at the Company that are related to the transaction.	Financial Intelligence Centre Act, 38 of 2001
Records in respect of money and assets held on behalf of clients which confirm: the amount of money and financial products at year end held by the provider on behalf of clients; that such money and financial products were throughout the financial year kept separate from those of the business of the authorised financial services provider, and reports of any instance of non-compliance identified in the course of the audit and the extent thereof.	The Financial Advisory and Intermediary Services Act 37 of 2002 (FAIS Act)
The records and books of account of the financial institution.	The Financial Sector Regulation Act 9 of 2017
Accounting records - books of account, records or other accounting documents relating to the Company, including, without limitation, the amounts of remuneration paid or due by the Company to each employee; the amount of employees' tax deducted or withheld from the amounts of remuneration paid to employees; and the income tax reference number of each employee where that employee is registered as a taxpayer; SARS registration and tax records.	Income Tax Act, 58 of 1962
Employment records – records of all collective agreements; arbitration awards; and/or wage determinations.	Labour Relations Act, 1995

Category of Records	Applicable Legislation
Employment records – a record of each recommendation made to the Company or an inspector regarding any matter affecting the health or safety of persons at the workplace.	Occupational Health and Safety Act, 85 of 1993
Pension fund records - The rules of the fund to which the Company's employees belong.	Pension Funds Act, 24 of 1956
The Company's PAIA Manual.	Promotion of Access to Information Act, 2000
Records containing Personal Information – personal information relating to employees of the Company; the Company's Customers; the Company's suppliers/ vendors; the Company itself; and the Company's group of companies. Registration certificate, privacy notices, privacy statements.	Protection of Personal Information Act, 2013
Learnership records - the learnership agreements between learners and the Company; and learners' contracts of employment, if applicable.	Skills Development Act, 97 of 1998
Records relating to the skills development levy.	Skills Development Levies Act, 9 of 1999
Records containing the Company's street address, and the business's branches; the names, identification numbers and monthly remuneration of each of its employees, and the address at which the employees are employed.	Unemployment Insurance Act, 63 of 2001
Unemployment Insurance records - the Company's contributions to the Unemployment Insurance Fund.	Unemployment Insurance Contributions Act, 4 of 2002

8. Information automatically available

8.1 The following categories of Records are automatically available for inspection, purchase or photocopying.

8.2 Requests for these categories of information can be sent to Aon's Information Officer, whose contact details appear in section 5 of this Manual:

Category of records	Types of the Record	Available on Website	Available on request
General information pertaining to Aon	Company information, BBBEE level.	X	X
Services and product information	Brochures, marketing material, newsletters, articles and/or media statements.	X	X
Operational documents/information	PAIA Manual and Forms, Scope of Work Template.	X	X
Human Resources	Job advertisements		X

A Requester may request a copy of a Record described above and which will be provided subject to the payment of the fee for reproduction (where applicable).

9. Subjects and categories of information held by Aon

Aon holds the categories of information set out below which are available for inspection in terms of PAIA. The procedure in terms of which such Records may be requested from Aon is set out in Section 10 of this Manual. The Records listed below will not in all instances be provided to a Requester who requests them in terms of PAIA as the Requester is required to identify the right the Requester is seeking to exercise or protect and to provide an explanation of why the requested Record is required for the exercise or protection of that right. Furthermore, the request may be denied on the basis of the grounds of refusal under PAIA.

Category	Subject
Financial Tax and Regulatory Records	Monthly statements, annual statements, monthly management accounts, trial balances, general ledgers, income tax returns, provisional tax returns, annual budget agendas and minutes of finance meetings, invoices, cash books, cheque requests, journals, bank statements, reconciliations, debit/credit notes, ledger trial balances, foreign exchange documentation, VAT returns, asset register licenses, trademarks, service manuals, safety manuals, record of incidents, PAYE, VAT, Regional Services Levies, IRP2 and IRP5 documentation.
Company's Act and Contract documents	Memorandum and articles of association, share register, agendas, and minutes of board meetings, agendas and minutes of audit committee meetings, agendas and minutes of executive committee meetings, annual reports, service agreements and other agreements.

Operational Documents and Information	Client financial and operational documents, client business plans, note/minutes of meetings, presentation to potential clients, client documentation, general marketing and promotional information, debit/credit notes, statements, general correspondence, computer data records, minutes of client meetings, invoices, notes, authorization of payments, presentations to clients, brochures, performance records, marketing plans and strategies.
Human Resources	Offers of employment, applications for employment, contracts of employment, consultancy agreements, employee particulars, pension/provident fund application forms and death benefit beneficiary nominations, Workmen's compensation documentation, personnel policies, performance evaluations, job specifications, code of business ethics, employment equity plan, employee medical aid scheme documentation, employee pension fund documentation, disciplinary procedures and records, employee performance appraisals, loan and bursary agreements, payroll reports, training material, leave forms, Medical Schemes Act documentation, employee accreditation documentation and long service awards.
Information Technology	Software program and licensee, software application, contracts with computer suppliers and vendors, project documentation specifications, budgets, system documentation, escrow software documentation and manuals, reports and report definitions, invoices from suppliers and vendors, disaster recovery plans and procedures, all electronic documents, database systems with client information, internet connectivity, inter-company emails, Lotus Notes.

10. Procedure for requesting information not automatically available

- 10.1 A request must be made in the prescribed form as detailed in section 53 of PAIA. The procedural requirements are set out in this section. A copy of the form is attached marked **Annexure A**.
- 10.2 These forms are also electronically available from:
 - 10.2.1 Aon's Information Officer (whose contact details are in section 5 of this Manual); and
 - 10.2.2 the Regulator website <https://info regulator.org.za/wp-content/uploads/2020/07/InfoRegSA-PAIA-Form02-Reg7.pdf>
- 10.3 The prescribed form should be submitted to the Information Officer at the nominated address or email address, the Information Officer shall deal with the request him/herself or hand it to a designated person to deal with the request.

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- 10.4 In certain instances there is a prescribed fee (payable in advance where applicable) for requesting and accessing information in terms of PAIA. A Requester may also be called upon to pay the additional fees prescribed by regulations for searching for and compiling the information that is requested, including the costs of making copies of the information.
- 10.5 The Information Officer, as soon as reasonably possible and within thirty (30) Days after the request has been received, shall decide whether or not to grant the request.
- 10.6 The Requester shall be informed of the decision by the Information Officer, including fees payable, in the manner indicated by the Requester in the prescribed form, as per Regulation 8, which is annexed hereto as **Annexure K**. Noting that a request for a copy of the Guide may not be refused. Please refer to **Annexure J** for a copy of the prescribed Form for requesting a copy of the Guide.
- 10.7 Notwithstanding the foregoing, Aon will advise the Requester in the manner stipulated by the Requestor in the prescribed form of:
- 10.7.1 the access fee to be paid;
- 10.7.2 the format in which access will be given.
- 10.8 After access is granted, actual access to the Record requested will be given as soon as reasonably possible.
- 10.9 If the Request for Access to a Record is denied, the Requester is entitled to apply to a court for relief within One Hundred & Eighty (180) Days of notification of the decision. Such relief may include any order compelling the Record or Records requested to be made available to the Requester or for another appropriate order. The court will determine whether the Records should be made available or not. The Requester may also lodge a complaint with the Regulator against the refusal of the request by submitting the form contained in **Annexure L**.
- 10.10 The Requester may also approach the Regulator and lodge a complaint in accordance with section 74 of POPIA in the prescribed form in **Annexure L** against the access fee to be paid or the form of access granted. The details of the Regulator are as follows:
- Woodmead North Office Park
Maxwell Drive
Woodmead
Johannesburg
2191.
P.O Box 31533
Braamfontein
Johannesburg | 2017
Email: PAIAComplaints@inforegulator.org.za
- 10.11 Aon does not have any internal appeal procedures. As such, the decision made by the Information Officer is final and Requesters will have to exercise the external remedies at their disposal in the event that a Request for Access is refused.
- 10.12 In the event that the requester is refused the Information Officer shall advise the Requester in writing, in a notice of refusal and the notice of refusal shall state the following:
- 10.12.1 adequate reasons for the refusal;

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- 10.12.2 that the Requestor may lodge an appeal with a court of competent jurisdiction against the refusal of the request (including the period) for lodging such appeal or lodge a Complaint with the Regulator.
- 10.13 Upon the refusal by the Information Officer, the deposit paid by the Requester, if any, will be refunded.
- 10.14 If the Information Officer fails to respond within thirty (30) Days after a request has been received it is deemed in terms of section 58 read other with section 56 (1) of PAIA, that the Information Officer has refused the request.
- 10.15 The Information Officer may decide to extend the initial period of thirty (30) Days for another period of not more than thirty (30) Days if:
- 10.15.1 The request is for a large number of Records; or
 - 10.15.2 The search for the Records it to be conducted at premises not situated in the same town of city as the head office of Aon; or
 - 10.15.3 Consultation among branches, divisions, or departments, as the case may be, is required; or
 - 10.15.4 The Requester consents to such an extension in writing; or
 - 10.15.5 The parties agree in any other manner to such an extension.
- 10.16 Should Aon require an extension of time; the Requester shall be informed in the manner stipulated in the prescribed form of the reasons for the extension. In the case of an extension of the time limit, the Requester has the right to lodge a Complaint with the Regulator by following the process and completing the form prescribed by POPIA. The Requester may also make an application with a court against the extension.
- 10.17 It is important to note that access to information is not guaranteed – the Requester must identify the right she/he/it is seeking to protect and explain why the Record requested is required for the exercise or protection of that right. The Request for Access form must be completed with enough particularity to at least enable the Information Officer to identify the following:
- 10.17.1 The Record/s requested;
 - 10.17.2 The identity of the Requester;
 - 10.17.3 The form of access that is required, if the request is granted;
 - 10.17.4 The postal address or fax number of the Requester; and
 - 10.17.5 The right that the Requester is seeking to protect and an explanation as to why the Record is necessary to exercise or protect such a right.
- 10.18 If, in addition to a written reply from the Information Officer, the Requester wishes to be informed of the decision on the Request for Access in any other manner, the Requestor must state the manner and the particulars so required.
- 10.19 If a Request for Access is made on behalf of another person, the Requester must submit proof of the capacity in which the Requester is making the request to the reasonable satisfaction of the Information Officer.
- 10.20 If an individual is unable to complete the prescribed form because of illiteracy or disability, such a person may make the request orally.
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- 10.21 The prescribed fee for reproduction of the Record requested by a Personal Requestor will be charged in accordance with section 54(6) of PAIA.
- 10.22 If the search for a Record of Aon in respect of which a Request for Access by a Requester has been made; and the preparation of that Record for disclosure would, in the opinion of the Information Officer, require more than the 6 hours prescribed for this purpose, the Information Officer must by notice require the Requester to pay as a deposit the prescribed portion (being not more than one third) of the access fee which would be payable should the request be granted.
- 10.23 The Requester may lodge a Complaint with the Regulator by completing the form in **Annexure L** or make an application to court against the tender of the request fee or the tender or payment of a deposit, as the case may be.
- 10.24 If the Requester's interest affects a third party, then Aon will first need to inform the third party within twenty-one (21) Days of receiving the request and the third party will have twenty-one (21) Days to make representations and/or submissions regarding the granting of access to the Record. If the Information Officer does decide to grant access to the Record after considering these submissions, the third party that has been affected has thirty (30) Days in which to appeal the decision in the High Court or to lodge a complaint with the Information Regulator in accordance with section 74 of POPIA in the prescribed form. If no appeal or Complaint is lodged within thirty (30) Days, the Requester must be granted access to the Record.

11. Information of records not found

- 11.1 If a requested Record cannot be found or if the Records do not exist, the Information Officer shall, by way of an affidavit or an affirmation, notify the Requester that it is not possible to give access to the requested Record.
- 11.2 The affidavit or affirmation shall provide an account of all reasonable steps taken to find the Record or to determine its existence.
- 11.3 This notice will be regarded as a decision to refuse a Request for Access to the Record concerned for the purpose of PAIA.
- 11.4 If the Record should later be found the Requester shall be given access to Record in the manner stipulated by the Requester in the prescribed form unless access is refused by the Information Officer.
- 11.5 The attention of the Requester is drawn to the provisions of Chapter 4 of PAIA in terms of which Aon may refuse, on certain specified grounds, to provide information to a Requester. The grounds for refusal are set out in clause 12 below.

12. Grounds for Refusal

- 12.1 There are various grounds upon which Aon may or must refuse a Request for Access to a Record in accordance with Chapter 4 of PAIA. They are:
- 12.1.1 the protection of Personal Information of a third person (who is a natural person, including a deceased person) from unreasonable disclosure (section 63 of PAIA);
- 12.1.2 the protection of commercial information of a third party if the Records contain trade secrets, financial, commercial, scientific or technical information that may harm the commercial or financial interests of a third party (section 64 of PAIA);

- 12.1.3 refusing access to a Record if disclosure would result in the breach of a duty of confidence owed to a third party (section 65 of PAIA);
 - 12.1.4 refusing access to a Record if it would jeopardise the safety of an individual or prejudice or impair certain property rights of a third person (section 66 of PAIA);
 - 12.1.5 refusing access to a Record that was produced during legal proceedings, unless that legal privilege has been waived (section 67 of PAIA);
 - 12.1.6 refusing access to a Record containing trade secrets, financial or sensitive information or any information that would put the Private Body at a disadvantage in negotiations or prejudice it in commercial competition (section 68 of PAIA);
 - 12.1.7 refusing access to a Record containing information about research being carried out or about to be carried out on behalf of a third party (section 69 of PAIA).
- 12.2 Section 70 of PAIA contains an overriding provision. Disclosure of a Record that has been requested is compulsory if it would reveal a substantial contravention of, or failure to comply with the law, or imminent and serious public safety or environmental risk and the public interest in the disclosure of the Record clearly outweighs the harm contemplated by its disclosure.

13. Protection of Personal Information that is processed by Aon

13.1 Conditions for Lawful Processing

Chapter 3 of POPIA sets out the Conditions for Lawful Processing of Personal Information which must be complied with when a Responsible Party Processes Personal Information. Below is a description of the eight Conditions for Lawful Processing as contained in POPIA:

a) Accountability

POPIA provides that the Responsible Party is obliged to ensure that the Conditions for Lawful Processing and all other measures required in terms of POPIA are complied with.

b) Processing limitation

The Processing must be done lawfully and in a manner that does not infringe the right to privacy of a Data Subject. Personal Information may only be Processed if, given the purpose for which it is Processed, it is adequate, relevant and not excessive. There must furthermore be a justification for Processing Personal Information. Consent is one of the justifications, but Personal Information may be Processed in the absence of consent if it is necessary for pursuing the legitimate interests of the Responsible Party or the third party to whom it is disclosed or for the protection of the legitimate interests of the Data Subject. It may also be Processed if it complies with an obligation imposed by law or where it is necessary for the performance of a contract. The Processing of Special Personal Information or Personal Information of children generally requires consent, subject to certain limited exceptions.

c) Purpose specification

POPIA provides that Personal Information must be collected for a specific, explicitly defined and lawful purpose related to a function or activity of the Responsible Party. Subject to certain exceptions, Records of Personal Information must not be retained for longer than is necessary to achieve the purpose for which it was collected or subsequently Processed and must be destroyed or deleted once the Responsible Party is no longer authorised to retain the Record. Such exceptions include where (i) the retention is required or authorised by law, (ii) the Data Subject has consented to the retention, or (iii) the Personal Information is being retained for historical, statistical or research purposes.

d) Further Processing Limitation

POPIA provides that the further Processing of Personal Information must be in accordance with or compatible with the purpose for which the Personal Information was collected.

e) Information quality

A Responsible Party must take reasonably practicable steps to ensure that Personal Information is complete, accurate, not misleading and updated where necessary.

f) Openness

A Responsible Party is required to maintain the documentation of all Processing operations under its responsibility as required in terms of PAIA and must take reasonably practicable steps to ensure that the Data Subject is made aware of the Personal Information being collected, together with other stipulated information, subject to certain exceptions.

g) Security safeguards

POPIA provides that a Responsible Party must secure the integrity and confidentiality of Personal Information in its possession or under its control by implementing appropriate, reasonable technical and organisational measures to prevent the loss of damage to or unauthorised destruction of Personal Information, or unlawful access to or Processing of Personal Information. In addition, the Responsible Party should take all reasonable measures to identify all reasonably foreseeable internal and external risks, establish and maintain appropriate safeguards against risks identified, verify that the safeguards are effectively implemented and ensure that the safeguards are updated in response to new risks.

h) Data subject participation

A Data subject is entitled to request a Responsible Party to confirm whether or not it holds Personal Information about the Data Subject, and to request the Record itself or a description of the Record, subject to the requirements in PAIA. A Data Subject may also request a Responsible Party to correct or delete Personal Information that is inaccurate, irrelevant, excessive, out of date, incomplete, misleading, obtained unlawfully, or to destroy or delete personal information that a Responsible Party is no longer authorised to retain.

13.2 Purpose of the Processing of Personal Information by Aon

The purposes for which Aon Processes or will Process Personal Information is set out in **Annexure B**.

13.3 Categories of Data Subjects and Personal Information/Special Personal Information relating thereto

As per section 1 of POPIA, a Data Subject may either be a natural or a juristic person. The categories of Data Subjects in relation to which Aon Processes Personal Information are set out in **Annexure C**.

13.4 Recipients or categories of recipients of Personal Information

Below sets out the categories of data subjects and the description of the categories of personal information to be processed. Please refer to **Annexure C** for further details.

Category of personal Information	Recipients or categories of Recipients to whom the personal information may be supplied
Operational Documents and Information, Contact details, address, names, registration and/or Banking details, Contract documents.	Various vendors or suppliers.
Contact details, address, names, registration number, Operational Documents and Information, License details, Banking details, Contract documents.	Service providers.
Company's Act and Contract documents, Operational Documents and Information, Human Resources, Information Technology.	Companies within Aon's group of companies.
Operational Documents and Information, Contact details, Information Technology, License details, banking details.	Insurance companies.
Financial Tax and Regulatory Records Information Technology, Human Resources, Operational Documents and Information, Returns and /or Regulatory submissions.	Regulator or Government institution (if requested).

13.5 Cross-border flows of Personal Information

13.5.1 Section 72 of POPIA provides that Personal Information may only be transferred by a Responsible

Party to a third party in a foreign country outside of the Republic of South Africa in the following circumstances:

- a) If the third party who is the recipient of the Personal Information is subject to a law, binding corporate rules or a binding agreement which provide an adequate level of protection that effectively upholds principles similar to the Conditions for Lawful Processing under POPIA, including provisions relating to the further transfer of Personal Information from the recipient to third parties who are in a foreign country; or
- b) If the Data Subject consents to the transfer of their Personal Information; or
- c) If the transfer is necessary for the performance of a contractual obligation between the Data Subject and the Responsible Party; or
- d) If the transfer is necessary for the conclusion or performance of a contract between the Responsible Party and a third party, concluded in the interests of the Data Subject; or
- e) If the transfer is for the benefit of the Data Subject, and it is not reasonably practicable to obtain the consent of the Data Subject, and if it were, the Data Subject, would in all likelihood provide such consent.

13.5.2 **Annexure D** contains a list of the planned cross-border transfers of Personal Information and the justification for such transfers.

13.5.3 Aon has entered into an agreement with all its offices and its affiliates to ensure that Personal Information shared with other entities within its group is adequately protected.

13.6 Description of information security measures to be implemented by Aon to ensure confidentiality, integrity and availability of the information.

The types of security measures implemented by Aon in order to secure the integrity and confidentiality of the Personal Information and ensure that Personal Information is protected from loss, damage, unauthorized destruction or unlawful access are listed in **Annexure E** hereto.

13.7 Objection to the Processing of Personal Information by a Data Subject

13.7.1 A Data Subject who wishes to object to the Processing of Personal Information in terms of Section 11(3)(a) of POPIA, must submit the objection to a Responsible Party at any time during office hours of a Responsible Party and may do so free of charge.

13.7.2 A Data Subject who wishes to object to the Processing of Personal Information in terms of section 11(3)(b) of POPIA, must submit the objection to a Responsible Party at any time during office hours of a Responsible Party and may do so free of charge.

- 13.7.3 A Data Subject who wishes to object to the Processing of Personal Information must do so on a form substantially similar to **Form 1, Annexure F** hereto, free of charge in terms of Section 11(3)(a) of POPIA.
- 13.7.4 A Responsible Party must, when collecting Personal Information of a Data Subject, notify the Data Subject in terms of Section 18(1)(h)(iv) of POPIA, of their right to object as referred to in Section 11(3) of POPIA.
- 13.7.5 If an objection to the Processing of Personal Information of a Data Subject is made telephonically, such an objection shall be electronically recorded by the Responsible Party and upon request, be made available to the Data Subject in any manner, including the transcription thereof.
- 13.8 **Request for correction, deletion or destruction of Personal Information or destruction or deletion of record of Personal Information**
 - 13.8.1 A Data Subject has the right, in terms of section 24 of POPIA, to request, where necessary, the correction, destruction, or deletion of his, her or its Personal Information.
 - 13.8.2 A Data Subject, who wishes to request a correction or deletion of his, her, or its Personal Information, as provided for in section 24(1) (a) of POPIA, has the right to request for correction or deletion of personal information at any time and free of charge, if the Personal Information is inaccurate, irrelevant, excessive, out of date, incomplete, misleading or obtained unlawfully.
 - 13.8.3 A Data Subject, who wishes to request the destruction or deletion of a record of his, her, or its Personal Information, in terms of section 24(1) (b) of POPIA, has the right to request the destruction or deletion of a record of his, her or its Personal Information at any time and free of charge, if a Responsible Party is no longer authorised to retain in terms of section 14 of POPIA.
 - 13.8.4 A request for a correction or deletion of Personal Information, as referred to in section 13.8.2 or a request for the destruction or deletion of a record of Personal Information, as referred to in section 13.8.3 must be submitted to a Responsible Party in a form which is substantially similar to **Form 2, Annexure G** hereto, free of charge and reasonably accessible to a data subject by hand, fax, post, email, SMS, WhatsApp message, or in any manner expedient to the data subject.
 - 13.8.5 A request for a correction or deletion of Personal Information by telephonic means shall be recorded by a Responsible Party and such recording shall, upon request, be made available to a Data Subject in any manner, including the transcription thereof which shall be free of charge.
 - 13.8.6 A Responsible Party must, within thirty (30) Days of receipt of the outcome of the request referred to in section 13.8.2 or 13.8.3, notify a data subject, in Writing, of the action taken as a result of the request.

13.9 Request for Data Subject's consent to process personal information for direct marketing through unsolicited electronic communication

13.9.1 In certain circumstances a Responsible Party may be required to obtain consent from a Data Subject to Process Personal Information for direct marketing through unsolicited electronic communications. In such circumstances a Responsible Party will request consent in a form substantially similar to **Form 4, Annexure H** hereto, or in any manner that may be expedient, free of charge and reasonably accessible to a data subject including –

- 13.9.1.1. email;
- 13.9.1.2. telephonically;
- 13.9.1.3. SMS or WhatsApp ;
- 13.9.1.4. facsimile;
- 13.9.1.5. automated calling machine.

13.9.2. A request for a data subject's consent to the processing of his, her, or its personal information as referred to in sub-section 13.9.1 above by telephonic means must be electronically recorded by a responsible party and such recording must upon request be made available to a data subject in any manner, including the transcription thereof which must be free of charge.

13.9.3 A request for a data subject's consent to the processing of his, her, or its personal information as referred to in sub-section 13.9.1 above by automated calling machine must be electronically recorded by a responsible party and such recording must upon request be made available to a data subject in any manner, including the transcription thereof which must be free of charge.

13.9.4 For the purpose of direct marketing through unsolicited electronic communications, opt-out shall not constitute consent as referred to in section 69(2) of POPIA.

13.10 Complaint regarding interference with the Protection of Personal Information/Complaint regarding determination of an Adjudicator in terms of Section 74 of the Protection of Personal information Act, 2103 (Act No. 4 of 2013)

13.10.1 The following persons may lodge a complaint –

- 13.10.1.1 a data subject whose personal information has been interfered with in terms of section 73 of the Act.
- 13.10.1.2 Any person acting on behalf of a data subject whose personal information has been interfered with, as referred to in section 73 of the Act.
- 13.10.1.3 Any person with sufficient personal interest in the subject matter of the complaint referred to in section 73 of the Act.
- 13.10.1.4 A responsible party or data subject who is aggrieved by the determination of an adjudicator in terms of section 63(3) of the Act; or
- 13.10.1.5 Any person acting in the public interest.

- 13.10.2 Subject to section 13.10.7 a complaint submitted to the Regulator must be in writing by completing –
 - 13.10.2.1 an online complaint **Form 5, Annexure I**, hereto, and available on the website of the Regulator; or
 - 13.10.2.2 the complaint form, **Form 5, Annexure I**, hereto, and which shall be made available at the office of the Regulator during office hours and any office designated by the Regulator.
- 13.10.3 The Regulator will assist any person who wishes to make a complaint, to reduce that complaint to writing.
 - 13.10.3.1 Should a complainant require assistance in a language other than English, the Regulator will strive to provide a person competent in the language of the complainant to assist to reduce the complaint to writing.
 - 13.10.3.1.1 A complaint may be submitted at-
 - 13.10.3.1.2 The offices of the Regulator during office hours,
 - 13.10.3.1.3 any other office designated by the Regulator as a place where complaints may be lodged.
- 13.10.4 The office designated by the Regulator in terms of sub-section 13.10.3.1.3 shall transfer the complaint to the Regulator within fourteen (14) Days of receipt of the complaint.
- 13.10.5 A complaint may also be submitted to the Regulator in the following manner:
 - 13.10.5.1 by fax;
 - 13.10.5.2 by post;
 - 13.10.5.3 by courier, at the Regulator's physical address; or
 - 13.10.5.4 by email to a designated email address.
- 13.10.6 The Regulator shall acknowledge receipt of the complaint and provide the complainant with the reference number within fourteen (14) Days after receipt thereof.
- 13.10.7 If a complaint a complaint lodged with the Regulator contains any personal information which is protected in terms of the Protected Disclosures Act, 2000 (Act No. 26 of 2000) (PDA), the identity of the complainant will be protected.
- 13.10.8 In the event the complainant wishes his, her or its identity not to be disclosed, valid reasons must be submitted together with the complaint. The Regulator will consider the reasons and inform the complainant of its decision as to whether it accepts or rejects the request for non-disclosure of the complainant's identity. The complainant will then be able to either withdraw or proceed with the complaint on this basis.
- 13.10.9 A staff member, duly designated by the Regulator, must render the necessary assistance, free of charge, to enable any person to comply with this Regulation.

14. Access to Health or other records

14.1 If the Information Officer who grants a Request for Access to a Record provided by a health practitioner in his capacity as such about the physical or mental health, or well-being:

14.1.1 of the Requester; or

14.1.2 if the request has been made on behalf of the person whom the Record relates, of that person.

14.2 If such health practitioner is of the opinion that the disclosure of the Record to the Requester would be likely to cause serious harm to such person's physical or mental health or well-being, the Information Officer may only give access to the Record if the Requester provides that adequate provision has been made for such counselling as may be necessary in the circumstances.

14.3 Before access to the Record is so given to the Requester, the person responsible for such counselling must be given access to the Record.

15. Updating of Manual

Aon Limpopo will review and where required update this manual annually or at such intervals as may be necessary.

Policy Sponsor		Title
Exco Member		Chief Law and Compliance Counsel.
Legal & Compliance		Compliance Manager
Version	Changes made	Date
0.1	Development of Policy	June 2021
0.2	Review	June 2022
0.3	Update following Regulator audit.	March 2023
0.4	Update following the Regulators recommendations.	August 2023
0.5	Update following the publication of new Forms	October 2023
0.6	Annual review and update. Enhancement to section 7. Inclusion of new Form J. Minor updates to wording.	November 2024
0.7	Amendment of the Regulations relating to the Protection of Personal Information Act: Regulations as per: GG 42110, RG 10897, GoN 1383, 14 December 2018, in schedule	June 2025

Annexure A: 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: Tanya Prozzi
The Information Officer Aon
The Place
1 Sandton Drive
Sandhurst, Sandton
2196
PO Box 78367
Sandton
2146
Telephone: 0860 100 404
Email: comments@aon.co.za

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 <i>(when made on behalf of another person)</i>			
Postal Address			
Street Address			
E-mail Address			
Contact Numbers	Tel. (B):		Facsimile
	Cellular:		



Full names of person on whose behalf request is made (if applicable):			
Identity Number			
Postal Address			
	Code		
Street Address			
	Code		
E-mail Address			
Contact Numbers	Tel. (B)		Facsimile
	Cellular		
PARTICULARS OF RECORD REQUESTED <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>			
Description of record or relevant part of the record:			
Reference number, if available			

Any further particulars of record	
TYPE OF RECORD <i>(Mark the applicable box with an "X")</i>	
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</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: <i>(State Rank, Name Surname of Information Officer)</i>	
Date received:	
Access fees:	
Deposit (if any):	

Signature of Information Officer

Annexure B: DESCRIPTION OF PURPOSE OR REASONS OF PROCESSING PERSONAL INFORMATION

Aon South Africa (Pty) Ltd:

- to provide a quotation for personal insurance to the clients.
- to issue a personal insurance policy to clients.
- to maintain and service the policy.
- to collect premiums in respect of the policy.
- to process claims in respect of the policy.
- for reporting purposes.
- to perform in accordance with the deliverables in the client services agreement (TOBA).
- to comply with certain disclosure requirements.
- to facilitate the sale of insurance policies.
- for the management of claims and the policy from inception.
- for underwriting requirements.
- for purposes of communication with the Data Subject.
- to assess underwriting risks.
- for renewal management of clients policies.

Employees:

- for carrying out and managing Aon's business operations.
- for compliance with legal obligations.
- for administering and maintaining personnel records, including occupational health & safety records.
- for paying and reviewing salary, expenses and any other administration of remuneration and benefits.
- for providing and administering benefits (including, if relevant, pension, life assurance, income protection insurance, medical insurance, and share schemes).
- for undertaking performance management, talent management, succession planning, training and development, disciplinary and grievance procedures, and associated investigations.
- for managing business travel.
- for purposes of corporate security and surveillance and archiving of emails for disaster recovery purposes.
- for maintaining leave and other absence records.
- for monitoring employment equity and BBBEE obligations and support legal reporting.
- for providing information to regulatory bodies and tax authorities.
- for the processing of third parties.
- for pursuing any other of Aon's legitimate business interests.

Annexure C: DESCRIPTION OF DATA SUBJECT OR CATEGORY OF DATA SUBJECTS AND CATEGORIES OF PERSONAL INFORMATION IN RELATION TO THE DATA SUBJECTS*

Data Subject or Category of Data Subject	Description of Personal Information processed in relation to Data Subject
Employees including Company directors and job applicants	• Name, • Identity number, • Marital status, • Tax number, • Physical and postal address, • Emergency contact details
	• Identity records, • Photographs, • Reference codes, • Credit history, • Education and professional experience, • Employee travel and expense information, • Gender, • Banking details, • CV, • Driver's licence, • Payslip, • Biometric information.
Third party service providers, including medical aid providers, suppliers/ vendors	• Full names, • Identity numbers of natural persons and registration • numbers of juristic persons; date of birth, • Contact details: physical and postal addresses; • email addresses, private and work telephone numbers, • Identifying factors: gender, race, colour, marital status, age, language, • Information relating to education, • Employment and education history of a person, • Health information: health status, pregnancy, disability, • Criminal history, • Financial information, • Personal opinions, views, preferences, • Correspondence and confidential information, • Companies' constitutional documents relating to shareholder and board member obligations, • Vat registration details.

Data Subject or Category of Data Subject	Description of Personal Information processed in relation to Data Subject
Clients, suppliers, service providers	• Full names, • Company information and contact details, • Biometric information, • Details for postage and parcel deliveries, • CCTV footage, • Vehicle registration number, • Vehicle details and value, • Identity number, • Passport number, expiry date of passport, • Mobile contact number, • Physical and postal addresses, • Email addresses, • Private and work telephone numbers, • Identity numbers of natural persons, • The total sum of insured of assets, • Electronic signatures, • Marital status, • National origin, • Age, • Language, • Employment, • Criminal history, • Financial information, • Companies' constitutional documents relating to shareholder and board member obligations • High-value assets subject to underwriting, • Banking details, • Information relating to education, • Employment and education history of a person, • Health information: health status, pregnancy, disability, • Religious or philosophical beliefs, • Trade union membership, • Personal opinions, views, preferences, • Correspondence and confidential information.

Data Subject or Category of Data Subject	• Description of Personal Information processed in relation to Data Subject
Visitors to Aon's websites and platforms	• Full names, • Company information, • Contact details, • Cookie information, • IP address, • Password and log in details, • Payment information.
Shareholders and board members of Aon	• Board Member photo, • Full Names and title, • Qualifications, • Employment History.
*The above list is not exhaustive and may change from time to time.	

Annexure D: CROSS-BORDER FLOWS OF PERSONAL INFORMATION

Country	Justification for Transfer (in terms of section 72 of POPIA)	Categories of personal information
Ireland	Intra-group data transfer agreement	Financial, Tax and Regulatory Records, Company's and Contract documents, Operational Documents and Information, Human Resources, Information Technology.
France	Intra-group data transfer agreement	Operational Documents and Information, Information Technology.
Netherlands	Intra-group data transfer agreement	Operational Documents and Information.
Germany	Intra-group data transfer agreement	Operational Documents and Information, Information Technology.
Australia	Intra-group data transfer agreement	Operational Documents and Information.
India	Intra-group data transfer agreement	Financial, Tax and Regulatory Records, Operational Documents and Information, Human Resources, Information Technology.
Poland	Intra-group data transfer agreement	Operational Documents and Information, Financial, Tax and Regulatory Records, Human Resources, Information Technology.
United Kingdom	Intra-group data transfer agreement	Financial, Tax and Regulatory Records, Operational Documents and Information.
United States of America	Intra-group data transfer agreement	Financial, Tax and Regulatory Records, Operational Documents and Information, Human Resources.
European Union	Intra-group data transfer agreement	Financial, Tax and Regulatory Records, Company's Act and Contract documents, Operational Documents and Information, Human Resources.

Annexure E: SECURITY MEASURES IMPLEMENTED BY AON

The security of your personal information is important to us and Aon has implemented reasonable physical, technical and administrative security standards to protect personal information from loss, misuse, damage, alteration or destruction.

The following is a list of the types of security measures implemented by Aon in order to ensure that Personal Information is protected from loss of, damage to or unauthorized destruction of or unlawful access to Personal Information which is not exhaustive in nature:

- We protect your Personal Information against unauthorized access, processing, use or disclosure, using security technologies and procedures, such as encryption and limited access.
- Only authorized individuals access your Personal Information, and they receive training about the importance of protecting Personal Information.
- Our service providers and agents are contractually bound to maintain the confidentiality of Personal Information and may not use the information for any unauthorized purpose.
- Password Protection.
- Data Encryption.
- 2- Factor authentication.
- Anti-virus solutions.
- Anti-malware solutions.
- Cyber security solutions.



**Annexure F: FORM FOR THE OBJECTION TO THE PROCESSING OF PERSONAL INFORMATION IN
TERMS OF POPIA**

(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, 2025

[Regulation 2]

Note:

- 1. If the space provided for in this Form is inadequate, submit information as an Annexure to this
Form*
- 2. Complete as is applicable*

A	DETAILS OF THE DATA SUBJECT	
Name(s) and Surname/ registered name of data subject		
Postal or business address:		
	Code	
Contact number(s):		
Fax number/Email address:		
B	DETAILS OF RESPONSIBLE PARTY	
Name(s) and surname/Registered name of responsible party (if the responsible party is a natural person):		
Postal or business address:		
	Code	
Contact number(s):		
Fax number:		



C	REASONS FOR OBJECTION IN TERMS OF SECTION 11(3)(a) <i>(Please provide detailed reasons for the objection)</i>

Signed at _____ this _____ day of _____ 20__

Signature of data subject/designated person



Annexure G: FORM FOR THE REQUEST TO CORRECT OR DELETE PERSONAL INFORMATION OR DESTROYING OR DELETION OF RECORD OF PERSONAL INFORMATION IN TERMS OF POPIA

FORM 2

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, 2021,

[Regulation 3]

Note:

- 1. *Affidavits or other documentary evidence as applicable in support of the request may t 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:

a) Correction		or deletion		of the personal information about the data subject which is in possession or under the control of the responsible party.
---------------	--	-------------	--	--

Please select applicable reasons for the selected request, and insert the requests:

a) Inaccurate	
b) Irrelevant	
c) Excessive	
d) Out of Date	
e) Incomplete	
f) Misleading	
g) Obtained unlawfully	

b) Destruction		or deletion		of a record of personal information about the data subject which is in the possession or under the control of the responsible party and who is no longer authorised to security the record of information.
----------------	--	-------------	--	--



A	DETAILS OF THE DATA SUBJECT	
Name(s) and surname/registered name of data subject:		
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 (if the responsible party is a natural person):		
Postal or business address:		
	Code	
Contact number(s):		
Fax number/E-mail address		
C	PERSONAL INFORMATION TO BE CORRECTED/DESTROYED/DELETED (Please specify the personal information required to be corrected/destroyed/deleted)	



D	EXPLANATION FOR THE SELECTED REASON FOR THE REQUEST <i>(Please provide detail explanation for the selected reasons for the request for correction or deletion of personal information which is in possession or under the control of the responsible party)</i>

Signed at _____ this _____ day of _____ 20_____

Signature of data subject/designated person

Annexure H: FORM FOR REQUEST FOR CONSENT OF A DATA SUBJECT FOR THE PROCESSING OF PERSONAL INFORMATION FOR THE PURPOSE OF DIRECT MARKETING

FORM 4

Request for the consent of a data subject for the processing of personal information for the purpose of direct marketing through unsolicited electronic communication in terms of section 69(2) of the Act

[Regulation 6]

PART A

TO:

(Name of data subject)

FROM:

Contact Number(s):

Fax Number:

E-mail address:

(Name, address and contact details of responsible party)

Specify goods or services to be marketed: _____

Full names and designation of person signing on behalf of responsible party:

Signature of designated person

Date

PART B

I, _____ (*full names of data subject*) hereby:

☐

Give my consent

To receive direct marketing by means of unsolicited electronic communication in respect of the goods or services to be marketed

SPECIFY METHOD PREFERRED COMMUNICATION:

Fax

E-mail

SMS

OTHERS - Please specify:

Signed at _____ this _____ day of _____ 20 _____

Signature of data subject

Annexure I: FORM FOR COMPLAINT REGARDING INTERFERENCE WITH PROTECTION OF PERSONAL INFORMATION/COMPLAINT REGARDING DETERMINATION OF AN ADJUDICATOR IN TERMS OF POPIA

FORM 5

Complaint regarding interference with the protection of personal information/complaint regarding determination of an Adjudicator in terms of Section 74 of the Protection of Personal Information Act, 2013 (Act No. 4 of 2013)

**Regulations relating to the Protection of Personal Information, 2021
[Regulation 7]**

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".

Complaint regarding:

☐	Alleged interference with the protection of personal information
☐	Determination of an adjudicator

PART I	ALLEGED INTERFERENCE WITH THE PROTECTION OF THE PERSONAL INFORMATION IN TERMS OF SECTION 74(1) OF THE PERSONAL INFORMATION ACT, 2013 (Act No. 4 of 2013)	
A	PARTICULARS OF COMPLAINANT	
Name(s) and surname / registered name of data subject:		
Unique Identifier / Identity Number if		
Address:		
	Code	
Contact number(s):		
Fax number/ E-mail address:		

B	PARTICULARS OF RESPONSIBLE PARTY INTERFERING WITH PERSONAL INFORMATION	
Name(s) and surname/ Registered name of responsible party:		
Address:		
	Code	
Contact number(s):		
Fax number/ E-mail address:		
C	REASONS FOR COMPLAINT (Please provide detailed reasons for the complaint)	
PART II	COMPLAINT REGARDING DETERMINATION OF ADJUDICATOR IN TERMS OF SECTION 74(2) OF THE PROTECTION OF PROTECTION OF INFORMATION ACT, 2013 (ACY NO. 4 OF 2013)	
A	PARTICULARS OF COMPLAINANT	
Name(s) and surname/ registered name of data subject:		
UniquelIdentifier/Identity Number if required:		
Address:		
	Code	
Contact number(s):		
Fax number/ E-mail address:		



B	PARTICULARS OF ADJUDICATOR AND RESPONSIBLE PARTY	
Name(s) and surname/ Registered name of adjudicator:		
Address:		
	Code	
Contact number(s):		
Fax number/ E-mail address:		
C	REASONS FOR COMPLAINT <i>(Please provide detailed reasons for the grievance)</i>	

Signed at _____ this _____ day of _____ 20__

Signature of data subject/designated person

Annexure J: FORM FOR THE REQUEST FOR A COPY OF THE GUIDE

TO: Tanya Prozzi
Information Officer
The Place
1 Sandton Drive
Sandhurst
Sandton
2196
PO Box 78367 | Sandton | 2146
Telephone: 0860 100 404
Email: comments@aon.co.za

Full names:			
In my capacity as (mark with "x"):	Information officer		Other
Name of private body (if applicable)			
Postal Address:			
Street Address:			
E-mail Address:			
Facsimile:			
Contact numbers:	Tel.(B):		Cellular

hereby request the following copy(ies) of the Guide:

Language (mark with "X")		No of copies	Language (mark with "X")		No of copies
	Sepedi			Sesotho	
	Setswana			siSwati	
	Tshivenda			Xitsonga	
	Afrikaans			English	
	isiNdebele			isiXhosa	
	isiZulu				



Manner of collection (mark with "x"):

Personal collection	Postal address	Facsimile	Electronic communication (Please specify)

Signed at _____ this _____ day of _____ 20 _____

Signature of requester

Annexure K: 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 <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>	

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
The request fee payable by every requester	R140		
Photocopy	R2.00 per page or part thereof.		
Printed copy	R2.00 per page or part thereof.		

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			
• If provided to the requestor	R60.00		
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			
• If provided to the requestor	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. To not exceed a total cost of R435.00	R145.00		
Deposit: If search exceeds 6 hours	One third of amount per request calculated in terms of items 2 to 8.		
Postage, e-mail or any other electronic transfer:	Actual costs		
Total:			

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

Annexure L: FORM FOR THE LODGING OF A COMPLAINT
[Regulation 10]

Note:

1. *This form is designed to assist the Requester (hereinafter referred to as “the Complainant”) ⁹ in requesting a review of a public or private body’s response or non-response to a request for access to records under the Promotion of Access to Information Act 2 of 2000 (“PAIA”) ⁹. Please fill out this form and send it to the Information Regulator (“Regulator”) ⁹ or email the Information Regulator at PAIAComplaints@inforegulator.org.za*
2. *PAIA gives the public a right to file a complaint with the Regulator about any of the nature of complaints detailed in part E of this complaint form-*
3. *It is the policy of the Regulator to defer investigating or to reject a complaint if the Complainant has not first given the public or private body (herein after referred to as “the Body”) ⁹ an opportunity to respond to and attempt to resolve the issue. To help the Body address your concerns prior to approaching the Regulator, you are required to complete the prescribed PAIA form and submit it to the Body.*
4. *A copy of this form will be provided to the Body that is the subject of your complaint. The information you provide on this form, attached to this form or that you supply later, will only be used to attempt to resolve your dispute, unless otherwise stated herein*
5. *The Regulator will only accept your complaint once you confirm having complied with the prerequisites below.*
6. *Please attach copies of the following documents, if you have them:*
 - *Copy of the form to the Company requesting access to records;*
 - *The Company’s response to your complaint or access request;*
 - *Any other correspondence between you and the Company regarding your request;*
 - *Copy of the appeal form, if your complaint relate to a relevant body ;*
 - *The Company’s response to your appeal;*
 - *Any other correspondence between you and the Company regarding your appeal;*
 - *Documentation authorizing you to act on behalf of another person (if applicable);*
 - *Court order or court documents relevant to your complaint, if any.*
7. *If the space provided for in this Form is inadequate, submit information as an Annexure to this Form and sign each page.*



To: The Information Regulator

 P.O Box 31533 | Braamfontein | 2017

General Enquiries: enquiries@inforegulator.org.za

Tel number: +27 (0) 10 023 5200

Prerequisites

Did you submit request (PAIA form) for access to record of a public/private body?	Yes		No	
Has 30 days lapsed from the date on which you submitted your PAIA form?	Yes		No	
Did you exhaust all the internal appeal procedure against a decision of the Information officer of a public body?	Yes		No	
Have you applied to Court for appropriate relief regarding this matter?	Yes		No	

FOR REGULATOR’S USE ONLY

Received by: (Full names)		
Position:		
Signature:		
Complaint accepted:	Yes	No
Reference Number:		
<i>Date stamp</i>		

PART A		
Full names:		
Identity number:		
Postal Address:		
Street Address:		
E-mail address:		
Contact number(s):	Tel. (W):	
	Cellular	

I consent to being contacted at the above e-mail address or through that of my representative on my behalf. I acknowledge that sending e-mail over the Internet is not secure, in that it can be intercepted and/or manipulated and retransmitted.

PART B		
REPRESENTATIVE INFORMATION		
<i>(Complete only if you will be represented. A Power of Attorney must be attached if complainant is a representative, failing which the complaint will be rejected)</i>		
Full names of representative:		
Nature of representation:		
Identity number/Registration number:		
Postal Address:		
Street Address:		
E-mail address:		
Contact number(s):	Tel. (W):	
	Cellular	

PART C		
Type of body:	Private	
Name of *public/ private body:		
Name, surname and title of person you dealt with at the public or private body to try to resolve your complaint or request to access of information:		
Postal Address:		
Street Address:		
E-mail address:		
Contact number(s):	Tel. (W):	
	Cellular	
Reference number given (if any):		
PART D		
COMPLAINT		
<i>Tell us about the steps you have taken to try to resolve your complaint (Complaints should first be submitted directly to the public body for response and possible resolution; there are limited exceptions)</i>		
Date on which request for access to records submitted:		

Please specify the nature of the right(s) to be exercised or protected, if a complaint is against a private body:					
Have you attempted to resolve the matter with the Company?		Yes		No	
If yes, when did you receive it? (Please attach the letter to this application.)					
Did you appeal against a decision of the information officer of the public body?		Yes		No	
If yes, when did you lodge an appeal?					
Have you applied to Court for appropriate relief regarding this matter?		Yes		No	
If yes, please indicate when was the matter adjudicated by the Court? Please attach Court Order, if there is any.					
PART E DETAILED TYPE OF ACCESS TO RECORDS <i>(Please select one or more of the following to describe your complaint to the Regulator)</i>					
Unsuccessful appeal: (Section 77A(2)(a) or section 77A(3)(a) of PAIA)	I have appealed against the decision of the public body and the appeal is unsuccessful.				
Unsuccessful application for condonation:	I filed my appeal against the decision of the public body late and applied for condonation.				
(Sections 77A(2)(b) and 75(2) of PAIA)	The condonation application was dismissed.				
Refusal of a request for access: (Section 77A(2)(c)(i) or 77A (d)(i) or 77A(3)(b) or of PAIA)	I requested access to information held by a body and that request was refused or partially refused.				
The body requires me to pay a fee and I feel it is excessive: (Sections 22 or 54 of PAIA)	Tender or payment of the prescribed request fee.				
	The tender or payment of a deposit.				
	The tender or payment of a deposit.				
Repayment of the deposit: (Section 22(4) of PAIA)	The information officer refused to repay a deposit paid in respect of a request for access which is refused.				

Disagree with time extension: (Sections 26 or 57 of PAIA)	<i>The body decided to extend the time limit for responding to my request, and I disagree with the requested time limit extension, or a time extension taken to respond to my access request is inappropriate.</i>	
Form of access denied: (Sections 29(3) or sections 60(a) of PAIA)	<i>I requested access in a particular and reasonable form and such form of access was refused.</i>	
Deemed refusal: (Sections 27 or 58 of PAIA)	<i>It is more than 30 days since I made my request, and I have not received a decision. No response received and no extension has been taken. Extension period has expired, and no response received.</i>	
Inappropriate disclosure of a record: (Mandatory grounds for refusal of access to record)	<i>Records that are subject to the grounds for refusal of access to records have been inappropriately or unreasonable disclosed.</i>	
No adequate reasons for the refusal of access: (Section 56(3)(a) of PAIA)	<i>My request for access is refused, and a body did not provide valid or adequate reasons for the refusal, including the provisions of this Act relied on.</i>	
Partial access to record: (Section 28(2) of 59(2) of PAIA)	<i>The body has granted access to part of the requested records, and I believe that more of them should be disclosed.</i>	
Fee waiver: (Sections 22(8) or 54(8) of PAIA)	<i>I am exempt from paying any fee and the body has refused to grant my request to waive the fees.</i>	
Records that cannot be found or do not exist: (Section 23 or 55 of PAIA)	<i>The body indicated that some or all of the requested records do not exist, and I believe that more records do exist.</i>	
Failure to disclose records:	<i>The body decided to grant me access to requested records, but I have not received them.</i>	
No jurisdiction (exercise or protection of any rights): (Section 50(1)(a) of PAIA)	<i>The body indicated that the requested records are excluded from PAIA, and I disagree.</i>	

Frivolous or vexatious request: (Section 45 of PAIA)	<i>The body indicated that my request is manifestly frivolous or vexatious and I disagree.</i>	
Access to personal information: (Section 23 of POPIA)	<i>My request to a responsible party to confirm whether or not the responsible party holds personal my information has been refused</i>	
	<i>My request for access to record or a description of my personal information held by the responsible party, including information about the identity of all third parties, or categories of third parties, who have, or have had, access to my personal information has been refused.</i>	
Other:		

PART F: EXPECTED OUTCOME

How do you think the Regulator can assist you? Describe the result or outcome that you seek.

PART G

AGREEMENTS

The legal basis for the following agreements is explained in the Privacy Notice on how to file your complaint document. In order for the Regulator to process your complaint, you need to check each one of the checkboxes below to show your agreement:

I agree that the Regulator may use the information provided in my complaint to assist it in researching issues relating to the promotion the right of access to information as well as the protection of the right to privacy in South Africa. I understand that the Regulator will never include my personal or other identifying information in any public report, and that my personal information is still protected by Protection of Personal Information Act, 2013. I understand that if I do not agree, the Regulator will still process my complaint.

The information in this Complaint Form is true to the best of my knowledge and belief.

	<i>I authorize the Regulator to collect my personal complaint information (such as the information about me in this complaint form) and use it to process my human rights complaint relating to the right of access to information and / or the protection of the right to privacy.</i>
	<i>I authorize anyone (such as an employer, service provider, witness) who has information needed to process my complaint to share it with the Regulator. The Regulator can obtain this information by talking to witnesses or asking for written records. Depending on the nature of the complaint, these records could include personnel files or employer data, medical or hospital records, and financial or taxpayer information.</i>
	<i>If any of my contact information changes during the complaint process, it is my responsibility to inform the Regulator; otherwise, my complaint could experience a delay or even be closed.</i>

Signed at _____ this _____ day of _____ 20____

Complainant _____

Disclaimer

The information contained herein, and the statements expressed should not be considered or construed as insurance broking advice and are of a general nature. The information is not intended to address the circumstances of any particular individual or entity. Accordingly, the information contained herein is provided with the understanding that Aon, its employees and related entities are not rendering insurance broking advice. As such, this should not be used as a substitute for consultation with an Aon Broker or Consultant.

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For further information on our capabilities and to learn how we empower results for clients, please visit: www.aon.co.za or www.aon.com

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For more information, contact:

0860 100 404

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www.aon.co.za

