

PAIA MANUAL

Prepared in terms of section 51 of the *Promotion of Access to Information Act 2 of 2000* (as amended) and the *Protection of Personal Information Act 4 of 2013* (as amended)

of

MyProtector Group (Pty) Ltd T/A MyProtector

COMPILED: JANUARY 2024



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1. INTRODUCTIONS,

The POPI Act requires us to transparently disclose the ways in which we use and disclose clients' personal information that we receive from them. Our commitment to protecting client privacy guarantees that their personal information is handled appropriately, with transparency, and in compliance with relevant laws. The Company places significant importance on the right to privacy and security, treating all acquired personal information as private and confidential. Our dedication extends to ensuring secure access to the Company's services for all relevant parties.

This Privacy Policy outlines the processing and protection of your personal information. It should be read in conjunction with our Terms of Service, which delineates the services we offer, how they are provided, and the handling of your personal information. To use our services, it is essential to read, comprehend, and accept our Terms of Service.

MyProtector recognises the significance of transparency and upholds the Constitutional right to access information. Our dedication involves facilitating individuals who wish to access records to exercise and protect their rights, ensuring they have access to the PAIA Guide prepared by the Regulator. MyProtector offers support throughout the request process, taking meticulous care to safeguard all records from unauthorized access and processing them in accordance with South African law. In line with this commitment, MyProtector has crafted this PAIA manual in compliance with section 51 of PAIA to assist individuals seeking access to information held by MyProtector under PAIA.

2. LIST OF ACRONYMS AND ABBREVIATIONS,

In this document, unless context indicates otherwise, the meanings assigned to specific words and expressions, as well as cognate expressions, align with the corresponding definitions:

2.1 "MD" Managing Director

2.2 "IO" Information Officer;

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- 2.3 "Minister" Minister of Justice and Correctional Services;
- 2.4 "PAIA" Promotion of Access to Information Act No. 2 of 2000 as Amended;
- 2.5 "POPIA" Protection of Personal Information Act No.4 of 2013;
- 2.6 "Regulator" Information Regulator;
- 2.7 "Republic" Republic of South Africa; and
- 2.8 "LegalTech Platform" The wholly owned MyProtector bespoke technology that is secured within Microsoft Azure's servers and only accessed by MyProtector's technical team.

3 INTERPRETATIONS

In line with the provisions of the Protection of Personal Information Act, 4 of 2013 ("POPIA"), personal information is described as "*information pertaining to an identifiable, living, natural person, and where applicable, an identifiable, existing juristic person.*" The right to privacy is firmly established in South Africa's Constitution, Act 108 of 1996, guaranteeing everyone protection against the unlawful collection, retention, dissemination, and utilization of personal information.

To align with the sensitivity of certain personal information, our processing practices fully adhere to POPIA. This Privacy Policy pertains to the collection and processing of any personal information through our website, www.myprotector.net, and/or information authorized for collection from third parties.

4. PURPOSE OF MYPROTECTOR'S PAIA MANUAL

This PAIA Manual is useful for the public to:

- 4.1 check the categories of records held by MyProtector which are available without a person having to submit a formal PAIA request;

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- 4.2 have a sufficient understanding of how to make a request for access to a record of MyProtector, by providing a description of the subjects on which MyProtector holds records and the categories of records held on each subject;
- 4.3 know the description of the records of MyProtector which are available in accordance with any other legislation;
- 4.4 access all the relevant contact details of the Information Officer and Deputy Information Officer who will assist the public with the records they intend to access;
- 4.5 know the description of the guide on how to use PAIA, as updated by the Regulator and how to obtain access to it;
- 4.6 know if MyProtector will process personal information, the purpose of processing of personal information and the description of the categories of data subjects and of the information or categories of information relating thereto;
- 4.7 know the description of the categories of data subjects and of the information or categories of information relating thereto;
- 4.8 know the recipients or categories of recipients to whom the personal information may be supplied;
- 4.9 know if MyProtector has planned to transfer or process personal information outside the Republic of South Africa and the recipients or categories of recipients to whom the personal information may be supplied; and
- 4.10 know whether MyProtector has appropriate security measures to ensure the confidentiality, integrity and availability of the personal information which is to be processed.

5. KEY CONTACT DETAILS FOR ACCESS TO INFORMATION FROM MYPROTECTOR

5.1. Chief Information Officer

Name: Andrew McDonald

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Email: andrew@myprotector.net

5.2 Access to information general contacts

Email: admin@myprotector.net

5.3 Administration Head Office

Postal Address: 89 Eagle Ridge Estate, Tern Way, Howick, KZN, 3290

Physical Address: 89 Eagle Ridge Estate, Tern Way, Howick, KZN, 3290

Email: admin@myprotector.net

Website: <https://www.myprotector.net/>

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

6.1. The Regulator has, in terms of section 10(1) of PAIA, updated and made available the revised Guide on how to use PAIA ("PAIA Guide"), in an easily comprehensible form and manner, as may reasonably be required by a person who wishes to exercise any right contemplated in PAIA and POPI.

6.2. The Regulator has made the PAIA Guide available in each of the official languages of South Africa and in braille.

6.3. The PAIA Guide contains the following:

6.3.1. The objects of PAIA as well as POPI;

6.3.2. How to access the postal address, telephone number and email address of every registered IO and DIO (for both public and private bodies);

6.3.3. The manner and form of request for:

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

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

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- 6.3.4. the assistance available from the IO of a body in terms of PAIA and POPI;
- 6.3.5. the assistance available from the Regulator in terms of PAIA and POPI;
- 6.3.6. all remedies in law available regarding an act or failure to act in respect of a right or duty conferred or imposed by PAIA and POPI, including the manner of lodging –
 - 6.3.6.1. an internal appeal;
 - 6.3.6.2. a complaint to the Regulator; and
 - 6.3.6.3. an application with a court against a decision by the IO of a public body, a decision on internal appeal or a decision by the Regulator or a decision of the head of a private body;
- 6.3.7. the provisions of sections 14 and 51 of PAIA requiring a public body and private body, respectively, to compile a manual, and how to obtain access to a manual;
- 6.3.8. the provisions of sections 15 and 52 of PAIA providing for the voluntary disclosure of categories of records by a public body and private body, respectively;
- 6.3.9. the notices issued in terms of sections 22 and 54 of PAIA regarding fees to be paid in relation to requests for access; and
- 6.3.10. the Regulations.
- 6.4. Anyone can inspect or make copies of the PAIA Guide from MyProtector's offices as well as, the office of the Regulator, during normal working hours.
- 6.5. The PAIA Guide can also be obtained -
 - 6.5.1. upon request to MyProtector's IO or DIO;
 - 6.5.2. from the website of the Regulator (<https://www.justice.gov.za/inforeg/>).
- 6.6. A copy of the PAIA Guide is also available in the following official language, for public inspection during normal office hours

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6.6.1. English.

7. MYPROTECTOR RECORDS AVAILABLE WITHOUT REQUEST

The following records are made freely available by MyProtector and do not require any request for access:

Category of Record	Types of Records	Where Available
MyProtector Policies	Spam	On Website
MyProtector Policies	Acceptable Use	On Website
MyProtector Policies	System Security	On Website
MyProtector Document	Agreement Key Features	On Website
MyProtector Document	Terms & Conditions	On Website

8. MYPROTECTOR RECORDS AVAILABLE IN ACCORDANCE WITH ANY OTHER LEGISLATION

The following records are freely available to the public in accordance with legislation: -

Category of Record	Applicable Legislation
MyProtector Memorandum of Incorporation	Companies Act 71 of 2008
MyProtector PAIA Manual	Promotion of Access to Information Act 2 of 2000
MyProtector POPIA	Protection of Personal Information Act 4 of 2013

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9. SUBJECTS AND CATEGORIES OF RECORDS HELD ON EACH SUBJECT BY THE MYPROTECTOR GROUP:

MyProtector holds records on the following subjects: -

Subjects of MyProtector Records	Categories of Records
Strategic Documents	Share Certificates, Annual Reports
Business Agreements	SLA's, Contractor Agreements, Employee Agreements
TAX	Tax Records, Financial Reporting
Intellectual Property	LegalTech system design, How-To Autoresponders, Marketing Material

10. PROCESSING OF PERSONAL INFORMATION

10.1. RIGHTS UNDER THIS PRIVACY POLICY

The rights pertaining to the lawful processing of personal information include, but are not restricted to, the following:

- The right to be informed about the collection of your personal information or unauthorised access or acquisition by an external entity, such as in the event of a computer system breach by a hacker;
- The right to ascertain whether we possess your personal information and to request access to it;
- The right to request corrections, destruction, or deletion of your personal information when deemed necessary;
- The right to object, based on reasonable grounds, to the processing of your personal information;
- The right to object to the processing of your personal information for direct marketing purposes, including unsolicited communications;
- The right not to be subject, under specific circumstances, to decisions based solely on the automated processing of your personal information;
- The right to lodge a complaint with the Regulator if you believe there has been interference with the protection of your personal information or if an

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independent adjudicator handling your complaint against us has not made a correct decision; and

- The right to initiate civil proceedings against us if you believe we have interfered with the protection of your personal information.

10.2. CATEGORIES OF COLLECTED PERSONAL INFORMATION AND THE COLLECTION METHODS

We gather or receive directly from clients and process clients' personal information primarily to grant them access to services and/or products from providers with whom we have contractual agreements. Additionally, this facilitates the enhancement of our services to clients. The nature of the information collected depends on the specific purpose for which it is gathered and will only be processed for that designated purpose. Whenever possible, we communicate to the client the required and optional information.

We collect and process your personal information mainly to provide you with access to our services and products (and all other activities and processes incidental thereto), to help us improve our offerings to you and for certain other purposes explained below.

The type of information we collect will depend on the purpose for which it is collected and used (processed).

We will only collect information that we need for that specific purpose.

Examples of the personal information that we collect or that you place on the LegalTech Platform Vault are as follows (but it is not limited to the examples provided):

- Some of your information that we hold may include, your first and last name, identity number, email address, a home, postal or other physical address, other contact information, your title, birth date, gender, marital status, details of a driving license, occupation, qualifications, past employment, residency status, your investments, assets, liabilities,

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insurance (including previous insurance), income, expenditure, family history, medical information, telephone recordings of conversations, emails, your banking details, premiums paid and information relating to claims and other investigations (including reports and photos).

- We directly obtain information from you when you furnish us with your personal details, such as when you make a purchase of products or services, submit inquiries, or get in touch with us. Whenever feasible, we will clarify the mandatory information you need to provide and identify optional details. We may also collect information about you from other sources as explained below:
 1. Upon obtaining your consent, we may enhance the information you furnish to us by incorporating data received from other entities, like Product Providers or other Financial Services Providers. This practice aims to provide you with a more coherent and personalized experience in your engagements with us.
 2. We will refrain from intentionally collecting and processing the personal information of a child unless we secure the permission of a qualified individual. The outlined examples of collection are summarized below (though not restricted to the provided examples):
 - Our computer systems;
 - Our website;
 - Insurance, Investment, Customer Due Diligence and Application Forms;
 - Previous and current Insurance, Policies or Schedules;
 - Telephone Calls;
 - Emails;
 - Credit Reference Agency via the relevant Product Provider/s;

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- Business Partners such as Product Providers, Assessors, Brokers etc.; and
- Social Media Platforms such as What's Up, Facebook, MailChimp, etc.

10.3. HOW OBTAIN CONSENT

In order to use our services, you need to accurately complete a number of internal forms and documents available from us. These forms requires that you provide us with certain personal information which includes, but is not limited to, the personal information required for deceased estate administration.

We also obtain your consent when you complete the forms allowing is to proceed with a business transaction. If you do not agree to any part of this Privacy Policy, please send an email to our Information Officer at **admin@myprotector.net**.

10.4. HOW YOUR PERSONAL INFORMATION GETS USED

With the goal of offering continuous services, we seek to utilize your information to keep you updated on additional financial products and services that might be of specific interest to you. In handling matters related to your deceased estate, your information will be utilised by your executor. Additionally, you have the option to grant or withdraw consent and specify your communication preferences.

We do not engage in the sale of personal information to third parties. However, we may share your personal information with our service or product providers directly involved in delivering products or services to you. Agreements are in effect to guarantee their adherence to these privacy terms. Additionally, we may exchange your personal information with, and collect information about you from (considering examples of collection):

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- External entities for the mentioned purposes, such as contracted product providers or insurers, astute entities, credit reference and fraud prevention agencies, law enforcement agencies, banks, etc;
- Other insurers to prevent fraudulent claims;
- Other companies, as noted earlier, may be involved when we perceive that it would improve the services and products we can provide to you. This occurs only in instances where you have not expressed objection to such sharing; and
- Third parties or services providers such as IT providers, system administrators, collection agencies etc. that enables us to operate as a Listed Company, a Financial Services Provider and an Accountable or Non-Accountable Institution.

We will employ your personal information to adhere to legal and regulatory requirements or industry codes that we subscribe to, or those applicable to us, or as otherwise permitted by law. Any transfer of your personal information beyond the borders of South Africa will occur only with your consent and in compliance with high-standard privacy legislation. Your personal information will not be utilized for marketing purposes without your explicit consent.

10.5. WHERE WE STORE YOUR PERSONAL INFORMATION

Protecting your personal Information is very important to us. We store your information on a Structured Query Language ("SQL") Database within a Microsoft Azure Server either hosted in the cloud. The server stores and protects your data in the following manner:

- 100-GB of storage space per person
- Data secured by Microsoft cloud technology and Myprotector SaaS technology
- 256-bit Azure AES encryption and is FIPS 140-2 compliant and Myprotector managed

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- 24/7 system back-ups
- SSL and mySQL database technology
- No Myprotector employee has access to any of your client's data (unless you legally authorise it)
- Myprotector facilitates all relevant services as per the benefits matrix
- Data protected by a Myprotector registration number, security code and verification code.

10.6. TRANSFER OF PERSONAL INFORMATION TO THIRD PARTIES

If we transfer or store your personal information outside South Africa, we will take all reasonable measures to ensure that the recipient third party is bound by a law, binding corporate rules, or a binding agreement that guarantees an adequate level of protection. For us to fulfill our obligations under the services agreement between us and you, it may be necessary to share your personal information with third parties, such as our product providers. Your consent to this data sharing with third parties is documented in this Privacy Policy.

We commit to processing your personal information in a lawful manner, ensuring that neither we nor the third parties violate your privacy rights. Should we ever delegate the processing of your personal information to a third-party operator, we will guarantee that the operator employs reasonable technical and organizational measures equivalent to or better than ours to process and protect your personal information.

10.7. DISPUTE REMEDIES

- 10.7.1. If a requestor is unhappy with a decision made by MyProtector, they may submit a complaint to the Regulator.
- 10.7.2. A formal complaint to the Regulator should be submitted using a form that closely aligns with the structure of Form 5 as outlined in the Regulations. This complaint must be filed within 180 (one

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hundred and eighty) days from the date of receiving the decision from MyProtector.

- 10.7.3. The complaint will then follow the dispute resolution process described in the Regulations as well as the PAIA Guide.

11. LAWS GOVERNING THIS PRIVACY POLICY

This privacy policy is governed by the laws of the Republic of South Africa. Any disputes arising from this privacy policy will be resolved in a South African court.

Each individual whose personal information we process holds the following rights:

- You are entitled to request copies of your personal information, subject to the terms and conditions outlined in our Promotion of Access to Information (“PAIA”) manual and our POPIA Policy, available upon request;
- You have the right to request the correction of any information you deem inaccurate;
- You can request the erasure of your personal information, under specific conditions;
- You have the right to object to the processing of your personal information, under certain conditions; and
- You can lodge a complaint with the Information Regulator, whose contact details are provided in our PAIA Manual and POPIA Policy.

12. AVAILABILITY OF THE PAIA MANUAL

12.1. A copy of this PAIA Manual is available.

12.1.1. on our website, at <https://www.myprotector.net/>;

12.1.2. to the Information Regulator upon request.

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12.2. The fee for a copy of this PAIA Manual, as contemplated in Annexure B of the Regulations, shall be payable per each A4-size photocopy made.

13. UPDATE TO THIS PAIA MANUAL

The Group may amend this Manual from time to time and shall be reviewed no less than once within each calendar year cycle. Reasonable efforts will be made to inform all employees of any amendments to the policy.

14. HOW TO CONTACT US

If you have questions and/or comments about our privacy policy or need to protect any of your rights set out in this policy, please contact our Information Officer on email address: **admin@myprotector.net**.

Issued by

Andrew McDonald

Managing Director – Information Officer

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