

MANUAL

Prepared in terms of

Section 51 of The Promotion of Access to Information Act 2 of 2000

and

The Protection of Personal Information Act, 4 of 2013

for assistance in requesting information from:

RGA Reinsurance Company of South Africa Limited

(Registration No: 1997/020948/06),

a 100% owned subsidiary of

RGA South African Holdings (Proprietary) Limited

(Registration No: 1997/020923/07)

1. Introduction

This Manual is published in terms of Section 51 of the Promotion of Access to Information Act, 2000 (“PAIA”) and the Protection of Personal Information Act 2013 (“POPIA”). These Acts give effect to the provisions of section 32 of the Constitution, which provides for the right of access to information held by the State and to information held by another person that is required for the exercise and/ or protection of any right.

The reference to any information in addition to that specifically required in terms of Section 51 of the PAIA does not create any right or entitlement (contractual or otherwise) to receive such information, other than in terms of the PAIA.

RGA South African Holdings (Proprietary) Limited acts as a holding company for the operating entity, RGA Reinsurance Company of South Africa Limited (“RGA”) (together the “Companies”).

RGA was established in late 1998 as a foreign subsidiary of RGA Inc. RGA has grown to become a significant competitor in the life reinsurance market. The Companies operate out of offices in Johannesburg and Cape Town.

RGA is entitled, through its registration under the Insurance Act 18 of 2017, to conduct the following classes of reinsurance business:

- Funeral
- Risk
- Fund Risk
- Credit Life
- Life Annuities
- Reinsurance

2. List of subjects and records held by the above companies to which you could be entitled to access:

a. Policyholders and Beneficiaries

All records kept in terms of the provisions of the Insurance Act 18 of 2017 and the financial services industry (in general) pertaining to the reinsurance products offered.

b. Companies Act Records

All records maintained in terms of section 26 and section 31 of the Companies Act, 2008 including:

- Memorandum of Incorporation
- Annual Financial Statements
- Minutes of Board Meetings
- Records of Companies’ Directors
- Securities Register

c. Employees

All records maintained in terms of applicable labour laws, including:

- CVs, offers of employment and other recruitment related documents
- Contracts of employment
- Performance appraisals
- Records of disciplinary actions
- Other employment related documents

d. Other

All other records kept in terms of the legislation applicable to any of the abovementioned products or services and the financial services industry (in general), including the Securities Register.

3. How to obtain information

- A request for access to a record of the Company must be made in the form as prescribed in section 53 of PAIA. Complete the prescribed application form available at this link: <https://www.justice.gov.za/legislation/acts/2000-002.pdf>
- A requester is required to complete the necessary application form and submit same to the Information Officer of the Company using the contact details as follows:

Information Officer: Michael Porter (Managing Director)
Email: infos@rgare.com
Tel: (021) 4861811
Fax: (021) 4861702
Postal address: PO Box 13422
Mowbray
7705
Address: 7th Floor, The Terraces Black River Park
2 Fir Street
Observatory
7825

- The Information Officer will cause the application to be processed and inform the requester of fees, if any to be paid and any outstanding requirements in order to finalise the application.
- **NOTE:** Access to certain records may be denied on the grounds set out in the PAIA.
- A copy of the guide by the South African Human Rights Commission (SAHRC) as described in Section 10 of PAIA may be obtained from the SAHRC using the following details:

The SAHRC Research and Documentation Department
Postal Address: Private Bag 2700
Houghton
2041
Telephone: (011) 484 8300
Fax: (011) 484 1360
Website: www.sahrc.org.za

4. Protection of Personal Information that is Processed by the Company

4.1 Chapter 3 of POPIA provides for the minimum Conditions for Lawful Processing of Personal Information by a Responsible Party. These conditions may not be derogated from unless specific exclusions apply as outlined in POPIA.

4.2 The Company needs Personal Information relating to both individual and juristic persons in order to carry out its business and organisational functions. The manner in which this information is Processed and the purpose for which it is Processed is determined by the Company. The Company is at times both an Operator and a Responsible Party in terms of its contractual obligations. The Company is accordingly a Responsible Party for the purposes of POPIA and will ensure that the Personal Information of a Data Subject:

- i. is processed lawfully, fairly and transparently. This includes the provision of appropriate information to Data Subjects when their data is collected by the Company, in the form of privacy or data collection notices. RGA must also have a legal basis (for example, consent) to process Personal Information;
- ii. is processed only for the purposes for which it was collected;
- iii. will not be processed for a secondary purpose unless that processing is compatible

- with the original purpose.
- iv. is adequate, relevant and not excessive for the purposes for which it was collected;
 - v. is accurate and kept up to date;
 - vi. will not be kept for longer than necessary;
 - vii. is processed in accordance with integrity and confidentiality principles; this includes physical and organisational measures to ensure that Personal Information, in both physical and electronic form, are subject to an appropriate level of security when stored, used and communicated by the Company, in order to protect against access and acquisition by unauthorised persons and accidental loss, destruction or damage;
 - viii. is processed in accordance with the rights of Data Subjects, where applicable. Data Subjects have the right to:
 - (a) be notified that their Personal Information is being collected by the Company. The Data Subject also has the right to be notified in the event of a data security incident;
 - (b) know whether the Company holds Personal Information about them, and to access that information. Any request for information must be handled in accordance with the provisions of this Manual;
 - (c) request the correction or deletion of inaccurate, irrelevant, excessive, out of date, incomplete, misleading or unlawfully obtained personal information;
 - (d) object to the Company's use of their Personal Information and request the deletion of such Personal Information (deletion would be subject to the Company's record retention requirements);
 - (e) object to the processing of Personal Information for purposes of direct marketing by means of unsolicited electronic communications; and
 - (f) complain to the Information Regulator regarding an alleged infringement of any of the rights protected under POPIA and to institute civil proceedings regarding the alleged non-compliance with the protection of his, her or its Personal Information.

4.3 Purpose of the Processing of Personal Information by the Company

As outlined above, Personal Information may only be Processed for a specific purpose. The purposes for which the Company Processes or will Process Personal Information include, but is not limited to, the following:

Purpose of the processing	
Administer our business:	<ul style="list-style-type: none"> • Manage equity, investments and shares • Manage mergers and acquisitions • Calculate and allocate financial resources • Calculate and set-aside financial reserves • Fulfil legal and regulatory requirements • Audit our business
Provide reinsurance services to our clients:	<ul style="list-style-type: none"> • Manage our clients and treaties • Assess and re-assess risks to be insured • Assess claims • Check for potential fraud, sanctions, credit and anti-money laundering • Price our products and services
Promote our products and services:	<ul style="list-style-type: none"> • Share information about our products and services • Invite to attend our events and facilitate participation • Manage communications
Research and market analysis:	<ul style="list-style-type: none"> • Price our products and services • Develop new and improve existing services and products
Manage our recruitment process:	<ul style="list-style-type: none"> • Communicate with candidates

	<ul style="list-style-type: none"> • Assess candidate's professional experience, skills and abilities • Verify candidate's right to work • Provide an employment offer • Inform candidates of future job opportunities
Manage our employees:	<ul style="list-style-type: none"> • Carry out administrative procedures required for identification verification, record keeping and fulfilment of an employment contract • Manage leave entitlements, sick leave, compensation, and payroll • Provide benefits • Assess performance, conduct salary reviews and administer promotions • Provide training • Investigate and resolve any disputes, misconduct or disciplinary matters • Manage our health and safety policies and comply with our obligations • Foster diversity in the workplace • Facilitate social interaction among employees and collaborative working environment
Ensure security of our assets:	<ul style="list-style-type: none"> • Provide access to our premises, equipment and systems • Maintain the security of our premises, systems, facilities and data

4.4 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 Table below includes but is not limited to the various categories of Data Subjects that the Company Processes Personal Information on and the types of Personal Information relating thereto.

Categories of data subjects	
<i>Corporate</i>	<ul style="list-style-type: none"> • Group companies • Shareholders • Board members • Trustees • Directors • Investors • Other organisations and their employees (e.g. public bodies, banking institutions, suppliers and service providers)
<i>Product/Services related</i>	<ul style="list-style-type: none"> • Current and potential clients (ceding companies) • Advisors • Brokers • Policyholders and beneficiaries • Witnesses
<i>Employment related</i>	<ul style="list-style-type: none"> • Candidates • Employees • Consultants • Visitors to premises

Type/classes of information processed

- **Personal details:** name, age, gender, date of birth, photographs, marital status, nationality, height and weight, employee number.
- **Identification information:** government-issued ID and other certificates (for example, marriage certificates), driving license, taxpayer identification number, national ID number, passport ID number.
- **Corporate details:** company name, identification number.
- **Contact information:** address, telephone number and email address.
- **Information about family:** marital status, number of children and their name, age, gender, date of birth, address.
- **Employment information:** employment history, employer, job role, employment contract, start and leave dates, working pattern.
- **Financial information:** details pertaining to a bank account, annual income and compensation.
- **Insurance policy and claims related information:** policy number, previous insurance records and claims histories, insurance policy amount, terms and issue dates, recommendations and decisions regarding your policy underwriting and claims, including risk ratings.
- **Education information:** educational background, professional licenses and qualifications, skills.
- **Communication information:** communication preferences, opt-in/opt-out preferences, enquiries, complaints, requests.
- **Benefits related information:** available benefits, payments claimed.
- **Pay related information:** salary, payroll information, tax information, retirement and/or pension information, details of any leave, expenses claimed.
- **Personality test information**
- **Investigations related information:** grievance and dignity at work matters, disciplinary records, warnings or penalties issued, whistleblowing concerns.
- **Security monitoring related information:** information derived from monitoring IT acceptable use standards and access to premises, including employee user ID, IT systems access logs, access card logs, CCTV records.
- **Performance and training information:** performance at work, promotions, training history, development needs.

<i>Types / classes of special personal information processed</i>	
Racial or ethnic origin	Religious or other beliefs
Trade union membership	Physical or mental health details
Offences and alleged offences	Criminal proceedings, outcomes and sentences

4.5 Recipients of Personal Information

The table below includes but is not limited to the categories of recipients to whom the Company may provide a Data Subject's Personal Information subject to the Company's compliance with POPIA:

Recipients of Personal Information

- Family, associates and representatives of the person whose personal information we are processing
- Employment and recruitment agencies
- Financial organisations
- Credit reference agencies
- Healthcare, social and welfare organisations
- Healthcare professionals
- Central government
- Police forces and courts, where necessary
- Clients
- Business associates and other professional advisers
- Retrocessionaires
- Claimants, beneficiaries, assignees and payees
- Press and the media
- Persons making an enquiry or complaint
- Private investigators
- Current, past and prospective employers
- Educators and examining bodies
- Claims investigators
- Suppliers and service providers
- Industry bodies
- Ombudsman and regulatory authorities
- Survey and research organizations
- Debt collection and tracing agencies
- Other companies in the RGA Group
- Auditors
- Pension fund administrators
- Trade unions
- Security organizations

4.6 Cross-Border Flows of Personal Information

Section 72 of POPIA provides that Personal Information may only be transferred out of the Republic of South Africa if the:

- i. recipient country can offer such data an "adequate level" of protection. This means that its data privacy laws must be substantially similar to the Conditions for Lawful Processing as contained in POPIA; or
- ii. Data Subject consents to the transfer of their Personal Information; or
- iii. transfer is necessary for the performance of a contractual obligation between the Data Subject and the Responsible Party; or
- iv. transfer is necessary for the performance of a contractual obligation between the Responsible Party and a third party, in the interests of the Data Subject; or
- v. 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.

Personal Information may be transmitted transborder to other persons in other countries, and Personal Information may be stored in data servers hosted outside South Africa, which may not have adequate data protection laws. The Company will endeavour to ensure that all recipients of Personal Information in other countries will make all reasonable efforts to secure said data and Personal Information.

Below includes the cross-border transfers of Personal Information to the following:

- Other RGA group companies in other countries
- Retrocessionaires in other countries
- Suppliers and service providers in other countries.

4.7 Description of information security measures to be implemented by the Company

- Security measures such as anti-malware detection, firewall, encryption, back-up and disaster recovery, systems access controls and other are implemented by the Company in order to ensure that Personal Information is protected.
- The Company performs assessments of the suitability and effectiveness of information security measures in order to ensure that the Personal Information that is processed by the Company is safeguarded and Processed in accordance with the Conditions for Lawful Processing.

5. Updating and availability of this Manual

This Manual will be reviewed, if necessary, on an annual basis and is available on RGA's website at: <https://www.rgare.com/global-directory/emea/south-africa>).

Reviewed and updated on 12 October 2021.