Mufaro
EMPLOYEE BENEFITS

PROMOTION OF ACCESS TO INFORMATION ACT, 2 OF 2000 ("PAIA")

MANUAL

Effective Date: November 2026

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1. INTRODUCTION

The Promotion of Access to Information Act, 2 of 2000 ("PAIA") gives effect to the constitutional right of access to information held by public and private bodies where such information is required for the exercise or protection of any rights.

As a private body, Mufaro Employee Benefits (Pty) Ltd ("Mufaro") is required to compile and make available a PAIA Manual that describes the records held by the organisation and the process to be followed when requesting access to those records.

This Manual has been prepared in accordance with the requirements of PAIA and is intended to assist clients, retirement funds, employers, members, beneficiaries, employees, regulators and members of the public in understanding how requests for information may be submitted to Mufaro.

The Manual also supports Mufaro's commitment to transparency, accountability and responsible information governance.

Where a request relates to Personal Information, the provisions of the Protection of Personal Information Act, 4 of 2013 ("POPIA") shall also apply.

This Manual should be read together with Mufaro's publicly available POPIA Privacy Notice, which provides information regarding the collection, processing, protection and management of Personal Information.

2. PURPOSE OF THIS MANUAL

The purpose of this Manual is to:

- comply with the requirements of the Promotion of Access to Information Act, 2 of 2000;
- provide guidance on the process for requesting access to records held by Mufaro;
- describe the categories of records maintained by the organisation;
- identify the Information Officer responsible for administering requests under PAIA;
- explain how requests for access to information will be processed;
- outline the applicable request procedures, fees and statutory timeframes;
- promote transparency and accountability in the management of information;
- support compliance with the Protection of Personal Information Act, 4 of 2013 ("POPIA") where requests involve Personal Information.

Nothing contained in this Manual limits any rights afforded to Data Subjects under POPIA or any other applicable legislation.

3. ABOUT MUFARO EMPLOYEE BENEFITS (PTY) LTD

3.1 Company Information

Registered Name	Mufaro Employee Benefits (Pty) Ltd
Registration Number	2003 / 031745 / 07
Financial Services Provider (FSP) Number	FSP 4534
Physical Address	220 Willow Wood Office Park Cnr Cedar & 3rd Street Broadacres
Telephone Number	011 065 9590
Email Address	Enquiries@mufaro.co.za
Website	www.mufaro.co.za

3.2 Nature of Business

Mufaro Employee Benefits (Pty) Ltd ("Mufaro") is an authorised Financial Services Provider licensed in terms of the Financial Advisory and Intermediary Services Act, 37 of 2002 ("FAIS").

Mufaro specialises in the provision of employee benefits consulting, group risk consulting, intermediary services, claims administration, risk management and related advisory services to retirement funds, employers, insurers and other institutional clients.

The organisation provides professional consulting and administrative services across a range of employee benefit arrangements, including:

- Retirement Fund Risk Benefits;
- Claims Administration;
- Employee Benefits Consulting;
- Risk Management Consulting;
- Governance and Compliance Support; and
- Related Financial Services.

Mufaro conducts its business in accordance with applicable legislation, regulatory requirements, contractual obligations and recognised principles of sound corporate governance.

3.3 Regulatory Environment

Mufaro operates within a regulated financial services environment and is subject to various legislative and regulatory requirements, including but not limited to:

- Promotion of Access to Information Act, 2 of 2000 (PAIA);
- Protection of Personal Information Act, 4 of 2013 (POPIA);
- Financial Advisory and Intermediary Services Act, 37 of 2002 (FAIS);
- Pension Funds Act, 24 of 1956;
- Financial Intelligence Centre Act, 38 of 2001 (FICA);
- Companies Act, 71 of 2008;

- Long-term Insurance Act (where applicable to intermediary activities and contractual arrangements);
- Financial Sector Conduct Authority (FSCA) regulatory requirements; and
- Other applicable legislation governing the provision of financial services.

3.4 Governance Commitment

Mufaro is committed to conducting its business with integrity, transparency and accountability.

The organisation maintains governance, risk management, compliance, information security and privacy frameworks designed to support the lawful processing of information and the protection of confidential and Personal Information entrusted to it by clients, retirement funds, insurers, employers, employees, members and beneficiaries.

Further information regarding Mufaro's governance framework is contained within its internal governance policies, including the Data Privacy and Protection Policy, Information Security Policy, Third-Party Risk Management Policy and Data Retention and Destruction Policy.

4. LEGISLATIVE FRAMEWORK

4.1 General

This Manual has been prepared in accordance with the requirements of the Promotion of Access to Information Act, 2 of 2000 ("PAIA"), as amended, and is intended to facilitate the constitutional right of access to information held by private bodies where such access is required for the exercise or protection of any rights.

The Manual also supports Mufaro Employee Benefits (Pty) Ltd's commitment to transparency, accountability, good corporate governance and compliance with applicable legislation governing the management and protection of information.

4.2 Promotion of Access to Information Act (PAIA)

PAIA gives effect to the constitutional right of access to information held by both public and private bodies.

As a private body, Mufaro is required to:

- compile and maintain this PAIA Manual;
- make the Manual available to the public;
- receive and consider requests for access to records;
- provide access to records where the requirements of PAIA have been met; and
- refuse access only where lawful grounds for refusal exist under the Act.

Access to records will be considered in accordance with the provisions of PAIA and any other applicable legislation.

4.3 Protection of Personal Information Act (POPIA)

Where a request for access involves Personal Information, Mufaro shall process the request in accordance with both PAIA and the Protection of Personal Information Act, 4 of 2013 ("POPIA").

POPIA seeks to:

- promote the lawful processing of Personal Information;
- protect the privacy rights of Data Subjects;
- regulate the collection, use, storage, sharing and destruction of Personal Information;
- establish safeguards against unlawful access, disclosure or misuse of Personal Information; and
- provide Data Subjects with certain rights relating to their Personal Information.

Where appropriate, Mufaro shall balance the right of access to information under PAIA with the privacy rights protected under POPIA.

Further information regarding the collection, use, disclosure and protection of Personal Information is available in Mufaro's POPIA Privacy Notice, published on the organisation's website.

4.4 Other Applicable Legislation

Depending on the nature of the information requested, Mufaro may also be required to consider obligations arising from other applicable legislation, including but not limited to:

- Financial Advisory and Intermediary Services Act, 37 of 2002 (FAIS);
- Pension Funds Act, 24 of 1956;
- Financial Intelligence Centre Act, 38 of 2001 (FICA);
- Companies Act, 71 of 2008;
- Basic Conditions of Employment Act, 75 of 1997;
- Labour Relations Act, 66 of 1995;
- Income Tax Act, 58 of 1962;
- Electronic Communications and Transactions Act, 25 of 2002;
- Financial Sector Conduct Authority (FSCA) regulatory requirements; and
- any other legislation applicable to the records requested.

Where two or more legislative requirements apply, Mufaro shall process requests in a manner that gives due consideration to all applicable legal obligations.

4.5 Relationship with Mufaro's Governance Framework

This Manual forms part of Mufaro's broader Information Governance Framework and should be read together with other governance documents adopted by the organisation, including:

- Data Privacy and Protection Policy;
- Data Retention and Destruction Policy;
- Information Security Policy;
- Third-Party Risk Management Policy;
- Business Continuity Plan;
- Risk Management and Compliance Programme (RMCP); and
- any other governance policies relevant to the protection, management and disclosure of information.

These documents collectively support Mufaro's commitment to lawful information management, regulatory compliance and sound corporate governance.

5. INFORMATION OFFICER

5.1 Designation of the Information Officer

In accordance with the Promotion of Access to Information Act, 2 of 2000 ("PAIA") and the Protection of Personal Information Act, 4 of 2013 ("POPIA"), Mufaro Employee Benefits (Pty) Ltd ("Mufaro") has designated an Information Officer responsible for ensuring compliance with the organisation's statutory obligations relating to access to information and the lawful processing of Personal Information.

The Information Officer is responsible for administering requests submitted in terms of PAIA and for overseeing Mufaro's compliance with applicable information governance legislation.

Where appropriate, one or more Deputy Information Officers may be appointed to assist the Information Officer in the execution of these responsibilities.

5.2 Contact Details

Requests for access to information and enquiries relating to this Manual should be directed to the Information Officer using the details below.

Information Officer	Rohine Singh
Deputy Information Officer	Busi Mbukwane
Position	Chief Operating Officer / Information Officer
Physical Address	220 Willow Wood Office Park Cnr Cedar & 3rd Street Broadacres
Postal Address	220 Willow Wood Office Park Cnr Cedar & 3rd Street Broadacres

Telephone Number	011 065 9590
Email Address	Enquiries@mufaro.co.za
Website	www.mufaro.co.za

5.3 Responsibilities of the Information Officer

The Information Officer is responsible for, amongst other things:

- overseeing compliance with PAIA and POPIA;
- receiving and processing requests for access to information;
- considering requests in accordance with applicable legislation;
- communicating decisions to requesters within the prescribed timeframes;
- ensuring that appropriate records are maintained to support access requests;
- promoting transparency and accountability in the management of information;
- overseeing the protection of Personal Information processed by Mufaro;
- ensuring that requests involving Personal Information are assessed in accordance with both PAIA and POPIA;
- maintaining this Manual and ensuring that it remains accurate and up to date; and
- acting as the primary point of contact for matters relating to access to information.

The Information Officer may delegate certain administrative responsibilities to authorised personnel while remaining accountable for compliance with applicable legislation.

5.4 Assistance to Requesters

The Information Officer shall provide reasonable assistance to individuals seeking access to records held by Mufaro, including guidance on:

- the procedures for submitting a request under PAIA;
- completion of the prescribed request forms;
- applicable request fees where relevant;
- statutory response timeframes;
- the distinction between requests made under PAIA and requests made by Data Subjects under POPIA;
- the process for requesting access to Personal Information held by Mufaro.

Assistance shall be provided in a fair, transparent and non-discriminatory manner.

5.5 Requests Relating to Personal Information

Where a request relates to a requester's own Personal Information, the Information Officer shall consider the request in accordance with the applicable provisions of both PAIA and POPIA.

The Information Officer may require reasonable proof of identity before granting access to Personal Information to ensure that information is disclosed only to authorised persons.

Further information regarding the processing of Personal Information and the rights of Data Subjects is available in Mufaro's publicly accessible POPIA Privacy Notice.

5.6 Delegation of Authority

The Information Officer may authorise appropriately qualified employees or Deputy Information Officers to perform administrative functions associated with the management of access requests.

Such delegation shall not remove the Information Officer's overall accountability for compliance with PAIA, POPIA and other applicable legislation.

6. GUIDE ON HOW TO USE PAIA

6.1 Purpose of the PAIA Guide

Section 10 of the Promotion of Access to Information Act, 2 of 2000 ("PAIA") requires the Information Regulator to compile and maintain a Guide to assist individuals in understanding their rights under PAIA and the procedures for requesting access to information held by public and private bodies.

The Guide has been developed to promote awareness of the right of access to information and to provide practical guidance on the submission of requests in terms of PAIA.

6.2 Contents of the Guide

The Guide published by the Information Regulator includes information regarding:

- the objectives and purpose of PAIA;
- how to determine whether PAIA applies to a request;
- the manner in which a request for access to records may be submitted;
- the prescribed request forms;
- applicable fees and payment requirements;
- the timeframes within which requests must be processed;
- the remedies available where access to information is refused;
- the relationship between PAIA and the Protection of Personal Information Act, 4 of 2013 ("POPIA");
- the contact details of the Information Regulator; and
- any additional guidance issued by the Information Regulator from time to time.

Requesters are encouraged to consult the Guide before submitting a request to Mufaro.

6.3 Access to the Guide

The PAIA Guide is available free of charge from the Information Regulator.

Copies may be obtained through the Information Regulator's official website or by contacting the Information Regulator directly.

Information Regulator (South Africa)

- **Website: https://inforegulator.org.za/**
- **General Enquiries: enquiries@inforegulator.org.za**
- **PAIA Complaints: PAIAComplaints@inforegulator.org.za**
- **POPIA Complaints: POPIAComplaints@inforegulator.org.za**

6.4 Assistance Available from Mufaro

Where a requester requires reasonable assistance in understanding the process for requesting access to records held by Mufaro, the Information Officer may provide guidance regarding:

- the submission of requests under PAIA;
- completion of the prescribed request form;
- applicable request procedures;
- prescribed fees;
- statutory response timeframes;
- requests relating to Personal Information under POPIA; and
- the categories of records held by Mufaro.

The Information Officer cannot provide legal advice regarding the merits of a request but will provide reasonable administrative assistance to facilitate the submission of requests in accordance with applicable legislation.

6.5 Relationship Between PAIA and POPIA

PAIA provides a mechanism through which individuals may request access to records held by Mufaro where access is required for the exercise or protection of any rights.

Where a request relates to Personal Information, Mufaro will consider the request in accordance with both PAIA and POPIA, ensuring an appropriate balance between the constitutional right of access to information and the protection of privacy.

Requesters seeking access to their own Personal Information may also exercise rights available under POPIA, subject to the requirements of that Act.

Further information regarding Mufaro's privacy practices is available in the POPIA Privacy Notice published on its website.

7. RECORDS HELD BY MUFARO

7.1 General

Mufaro Employee Benefits (Pty) Ltd ("Mufaro") maintains a wide range of records in the ordinary course of conducting its business. These records may exist in physical or electronic format and are retained in accordance with applicable legislation, contractual obligations and Mufaro's Data Retention and Destruction Policy.

The inclusion of a category of records in this Manual does not automatically entitle a requester to access such records. Access will be considered in accordance with the provisions of PAIA, POPIA and any other applicable legislation.

7.2 Corporate Governance Records

Examples include:

- Certificate of Incorporation;
- Memorandum of Incorporation (MOI);
- Shareholder records;
- Board and Committee documentation;
- Governance policies;
- Corporate governance registers;
- Strategic plans;
- Business continuity documentation;
- Internal governance reports.

7.3 Financial and Accounting Records

Examples include:

- Annual Financial Statements;
- General ledger;
- Trial balances;
- Tax records;
- VAT records;
- Payroll records;
- Banking records;
- Budgets and financial reports;
- Supplier invoices;
- Payment records;
- Asset registers.

7.4 Human Resources Records

Examples include:

- Employment contracts;
- Personnel files;

- Leave records;
- Payroll information;
- Performance management records;
- Training records;
- Recruitment documentation;
- Disciplinary records;
- Health and safety records (where applicable).

7.5 Client and Business Records

Examples include:

- Client agreements;
- Service Level Agreements;
- Consultancy reports;
- Client correspondence;
- Project documentation;
- Client instructions;
- Meeting records;
- Risk consulting reports;
- Governance reports.

7.6 Employee Benefits and Claims Administration Records

Examples include:

- Group Risk administration records;
- Claims administration records;
- Disability claims;
- Death claims;
- Funeral claims;
- Critical Illness claims;
- Medical reports (where applicable);
- Claims assessments;
- Benefit calculations;
- Claims correspondence;
- Supporting claim documentation.

Access to these records may be restricted where disclosure would infringe the privacy rights of individuals or where other legislative protections apply.

7.7 Retirement Fund Consulting Records

Examples include:

- Trustee reports;
- Board presentations;
- Actuarial reports received;
- Benefit design documentation;

- Risk benefit reviews;
- Fund governance reports;
- Employer engagement records;
- Fund communication material.

7.8 Information Technology Records

Examples include:

- Information Security documentation;
- System configuration records;
- User access records;
- Audit logs;
- Backup records;
- Disaster Recovery documentation;
- Network documentation;
- Software licence records;
- Asset inventories;
- Cybersecurity reports.

Certain Information Technology records may be restricted where disclosure could compromise the security of Mufaro's information systems.

7.9 Risk, Compliance and Legal Records

Examples include**:**

- Risk registers;
- Compliance monitoring reports;
- RMCP documentation;
- Internal audit reports;
- External audit reports;
- Legal opinions;
- Litigation records;
- Regulatory correspondence;
- Incident reports;
- Third-Party due diligence records.

7.10 Privacy and Information Governance Records

Examples include:

- PAIA Manual;
- Data Privacy and Protection Policy;
- Data Retention and Destruction Policy;
- Information Security policies;
- Information Officer records;
- Privacy Impact Assessments (where applicable);
- Personal Information processing records;

- Consent records;
- Privacy complaints;
- Breach notification records.

7.11 Contracts and Procurement Records

Examples include:

- Supplier agreements;
- Service Level Agreements;
- Outsourcing agreements;
- Binder agreements;
- Confidentiality agreements;
- Procurement records;
- Third-Party Risk Assessments;
- Vendor due diligence documentation.

7.12 Communication Records

Examples include:

- Business correspondence;
- Emails;
- Client communications;
- Meeting agendas;
- Minutes of meetings;
- Circulars;
- Notices;
- Reports;
- Presentations.

7.13 Records Held on Behalf of Clients or Third Parties

In the course of providing professional consulting and administrative services, Mufaro may hold records on behalf of clients, retirement funds, insurers, employers or other third parties.

Access to such records may be subject to:

- contractual obligations;
- confidentiality undertakings;
- statutory restrictions;
- legal privilege;
- POPIA;
- the rights of third parties.

Requests relating to records owned by another organisation may be referred to the relevant organisation where appropriate.

7.14 Records Held Electronically

Many records maintained by Mufaro are created, processed and stored electronically using secure business systems, including approved cloud-based platforms.

Electronic records are managed in accordance with Mufaro's Information Security Framework and Data Retention and Destruction Policy to ensure appropriate confidentiality, integrity, availability and protection throughout their lifecycle.

8. RECORDS AUTOMATICALLY AVAILABLE

8.1 General

Certain records held by Mufaro Employee Benefits (Pty) Ltd ("Mufaro") are made available to the public without the need to submit a formal request in terms of the Promotion of Access to Information Act, 2 of 2000 ("PAIA").

These records may be accessed through Mufaro's website, requested directly from the organisation, or otherwise made available in the ordinary course of business.

The availability of these records does not imply that confidential, proprietary or Personal Information will be disclosed.

8.2 Publicly Available Information

The following information may generally be made available without the submission of a formal PAIA request, subject to availability and any applicable legal or contractual restrictions:

Corporate Information

- Company profile;
- Public brochures and marketing material;
- Public contact details;
- Business service information;
- Website content.

Governance Information

- PAIA Manual;
- Privacy Notices;
- Complaints procedures (where applicable);
- Client communication material;
- Public governance statements.

Regulatory Information

- Financial Services Provider (FSP) licence details;
- Public regulatory registrations;
- Publicly available statutory disclosures;
- B-BBEE certificate (where publicly disclosed);
- Tax Compliance Status confirmation (where appropriate).

Client Information

General information regarding:

- products and services;
- claims submission processes;
- contact channels;
- complaints procedures;
- client service standards.

8.3 Information Available Upon Request

Certain information may be made available upon request, provided that:

- disclosure is permitted by law;
- disclosure does not infringe the rights of another person;
- contractual confidentiality obligations are not breached;
- disclosure does not compromise commercial confidentiality or information security.

Each request will be considered on its own merits and in accordance with PAIA and other applicable legislation.

8.4 Information Not Automatically Available

The following categories of information are not automatically available and may only be disclosed where authorised by law or following consideration of a formal request under PAIA:

- Personal Information;
- employee records;
- client records;
- retirement fund records;
- claims documentation;
- medical information;
- financial records;
- commercially sensitive information;
- confidential business information;
- legal advice protected by legal professional privilege;
- information belonging to third parties;
- information subject to contractual confidentiality obligations;

- information that may compromise information security;
- records protected by applicable legislation.

Access to these records shall be assessed in accordance with PAIA, POPIA and any other applicable legal or contractual obligations.

8.5 Availability of Governance Documents

Where appropriate, Mufaro may make certain governance documents available to clients, regulators, business partners or other authorised stakeholders to demonstrate its commitment to sound corporate governance and regulatory compliance.

Such disclosure shall remain subject to:

- confidentiality considerations;
- contractual obligations;
- information security requirements;
- legal and regulatory restrictions.

8.6 No Automatic Right of Access

The inclusion of any record or category of record within this Manual does not automatically entitle a requester to access that information.

All requests for access shall be considered in accordance with:

- the Promotion of Access to Information Act, 2 of 2000;
- the Protection of Personal Information Act, 4 of 2013;
- applicable contractual obligations; and
- any other relevant legislation.

Mufaro reserves the right to refuse access where lawful grounds for refusal exist.

Nothing in this Manual shall be interpreted as requiring Mufaro to disclose confidential information belonging to clients, retirement funds, insurers, employers, members or other third parties where such disclosure would be unlawful, would breach contractual obligations, or would prejudice the rights of another person.

9. REQUEST PROCEDURE

9.1 General

Any person requesting access to a record held by Mufaro Employee Benefits (Pty) Ltd ("Mufaro") must submit a request to the Information Officer in accordance with the provisions of the Promotion of Access to Information Act, 2 of 2000 ("PAIA").

Requests shall be considered fairly, objectively and in accordance with the requirements of PAIA, POPIA and any other applicable legislation.

Submission of a request does not automatically entitle a requester to access the requested record.

9.2 Submission of Requests

Requests for access to records should be submitted to the Information Officer using the prescribed PAIA Request Form and must contain sufficient information to enable Mufaro to:

- identify the requester;
- identify the record being requested;
- determine whether access may lawfully be granted;
- communicate with the requester regarding the request.

Where necessary, the Information Officer may request additional information to enable the request to be processed.

9.3 Information Required

A request should include, where applicable:

- the full name and contact details of the requester;
- proof of identity;
- sufficient particulars of the record requested;
- the right that the requester seeks to exercise or protect;
- an explanation of why the requested record is required for the exercise or protection of that right;
- the preferred manner in which access should be provided, where appropriate;
- proof of authority where the requester acts on behalf of another person.

Failure to provide sufficient information may delay the processing of the request.

9.4 Requests Made on Behalf of Another Person

Where a request is submitted on behalf of another individual or organisation, the requester shall provide satisfactory proof of authority to act on behalf of that person.

Mufaro may refuse to process the request until appropriate authority has been provided.

9.5 Verification of Identity

To protect confidential and Personal Information, Mufaro may require reasonable proof of identity before granting access to any record.

Where appropriate, additional verification may be required before records containing Personal Information or confidential information are released.

Identity verification is intended to protect the rights of Data Subjects and prevent unauthorised disclosure of information.

9.6 Acknowledgement of Requests

Upon receipt of a request, Mufaro shall acknowledge receipt and commence an assessment of the request in accordance with PAIA.

Acknowledgement of receipt does not imply that access has been granted.

9.7 Processing of Requests

The Information Officer shall assess each request to determine:

- whether the request complies with PAIA;
- whether the requested record is held by Mufaro;
- whether the requester has complied with the prescribed requirements;
- whether any grounds for refusal apply;
- whether consultation with a third party is required;
- whether additional information is required from the requester.

Each request shall be assessed on its own merits.

9.8 Timeframes

Mufaro shall notify the requester of its decision within 30 days of receiving a request, subject to the provisions of PAIA.

Where permitted under PAIA, this period may be extended by no more than an additional 30 days, including where the request involves a substantial volume of records, records held at different locations or consultations necessary to determine whether access may be granted.

The requester shall be notified in writing of any extension within the initial 30-day period, together with the reasons for the extension and the remedies available under PAIA.

9.9 Form of Access

Where access is granted, records may be provided in an appropriate format, including:

- inspection of records;
- paper copies;
- electronic copies;
- email transmission;
- other reasonable formats, where practicable.

The method of access shall be subject to:

- legal requirements;
- technical feasibility;
- protection of confidential information;
- payment of any prescribed fees.

9.10 Requests Involving Personal Information

Requests involving Personal Information shall be assessed in accordance with both PAIA and POPIA.

Where disclosure of Personal Information may adversely affect the privacy rights of another person, Mufaro shall consider the applicable protections contained in both Acts before granting access.

Additional safeguards may be applied where records contain Special Personal Information or information relating to third parties.

9.11 Notification of Decision

Following consideration of the request, the Information Officer shall notify the requester of the outcome.

The notification shall indicate whether:

- access has been granted;
- access has been partially granted;
- access has been refused;
- additional information is required; or
- payment of any applicable fees is required before access is provided.

Where access is refused, the requester shall be informed of the reasons for the decision and any remedies available under PAIA.

10. FEES

10.1 General

The processing of requests for access to records may be subject to the payment of fees prescribed under the Promotion of Access to Information Act, 2 of 2000 ("PAIA") and the applicable Regulations.

The applicable fees are intended to cover the reasonable administrative costs associated with processing requests and providing access to records.

10.2 Request Fees

Where permitted by PAIA, Mufaro Employee Benefits (Pty) Ltd ("Mufaro") may require the payment of a prescribed request fee before processing a request.

A request fee is generally payable where the requester is seeking access to records other than records containing their own Personal Information.

No request fee shall be charged where the law provides that such fee is not applicable.

10.3 Access Fees

Where access to a record is granted, an access fee may be payable to cover reasonable costs associated with:

- searching for and retrieving records;
- preparing records for disclosure;
- reproducing records;
- copying records;
- printing documents;
- electronic reproduction of records;
- postage or courier services, where requested.

The applicable fees shall be determined in accordance with the prescribed PAIA fee schedule.

10.4 Deposit

Where permitted under PAIA, Mufaro may require the requester to pay a deposit before processing a request where:

- the preparation of the requested records is expected to exceed the prescribed threshold; or
- the request involves a substantial volume of records.

The requester shall be notified if a deposit is required before further processing of the request.

10.5 Notification of Fees

Where any fee or deposit is payable, the Information Officer shall notify the requester in writing before access to the requested records is provided.

The notification shall include:

- the amount payable;
- the reason for the fee;
- the method of payment; and
- any applicable rights available to the requester under PAIA.

Processing of the request may be suspended until the prescribed fee or deposit has been paid where permitted by law.

10.6 Exemptions

Certain requesters or categories of requests may be exempt from the payment of fees in accordance with PAIA and the applicable Regulations.

Where an exemption applies, Mufaro shall process the request without requiring payment of the relevant fee.

10.7 Current Prescribed Fees

The fees applicable to requests made under PAIA are prescribed by legislation and may be amended from time to time.

Mufaro shall apply the fees prescribed in the Regulations that are in force at the time the request is received.

The current prescribed fee schedule may be obtained from:

- the Information Regulator's official website;
- the Department of Justice and Constitutional Development (where applicable); or
- the Information Officer upon request.

11. GROUNDS FOR REFUSAL OF ACCESS TO RECORDS

11.1 General

Although Mufaro Employee Benefits (Pty) Ltd ("Mufaro") is committed to transparency and facilitating lawful access to information, PAIA recognises that there are circumstances in which access to records may lawfully be refused.

Each request shall be considered individually, taking into account:

- the requirements of PAIA;
- the Protection of Personal Information Act, 4 of 2013 ("POPIA");
- other applicable legislation;
- contractual obligations;
- the rights of third parties; and
- the public interest, where applicable.

A refusal of access shall only occur where permitted or required by law.

11.2 Protection of Personal Information

Access may be refused where disclosure would involve the unreasonable disclosure of the Personal Information of another individual.

This includes circumstances where disclosure may:

- infringe the privacy rights of another person;
- expose confidential Personal Information;
- disclose Special Personal Information protected under POPIA;
- prejudice the lawful interests of another Data Subject.

Requests involving Personal Information shall be considered in accordance with both PAIA and POPIA.

11.3 Commercially Confidential Information

Access may be refused where disclosure would reveal:

- confidential commercial information;
- trade secrets;
- proprietary methodologies;
- confidential financial information;
- pricing information;
- commercially sensitive business information; or
- information that could reasonably prejudice the commercial interests of Mufaro or another party.

11.4 Confidential Information Belonging to Third Parties

Mufaro frequently holds information belonging to clients, retirement funds, insurers, employers and other third parties.

Access may be refused where disclosure would:

- breach contractual confidentiality obligations;
- prejudice the rights or legitimate interests of a third party;
- disclose confidential business information belonging to another organisation; or
- contravene applicable legislation.

Where required by PAIA, affected third parties may be consulted before a decision is made.

11.5 Legally Privileged Information

Access may be refused where the requested records are protected by legal professional privilege.

This includes confidential communications between Mufaro and its legal advisers prepared for the purpose of obtaining or providing legal advice or in contemplation of litigation.

11.6 Information Affecting Safety or Security

Access may be refused where disclosure could reasonably be expected to:

- compromise information security;
- expose cybersecurity controls;
- facilitate unlawful access to systems;
- endanger individuals;
- prejudice business continuity;
- compromise the security of information assets.

This includes certain Information Technology, network and cybersecurity records where disclosure would create an unacceptable security risk.

11.7 Records Prohibited from Disclosure by Law

Access may be refused where another Act of Parliament expressly prohibits disclosure of the requested information.

Such requests shall be considered in accordance with the applicable legislation.

11.8 Frivolous or Vexatious Requests

Mufaro reserves the right to refuse requests where permitted under PAIA, including where a request is:

- manifestly frivolous;
- vexatious;
- intended to disrupt business operations;
- an abuse of the rights created by PAIA.

Any such decision shall be made fairly and in accordance with the Act.

11.9 Partial Access

Where only a portion of a record qualifies for refusal, Mufaro shall, where reasonably practicable and permitted by law, grant access to the remainder of the record after removing or redacting the protected information.

11.10 Notification of Refusal

Where access is refused, whether in whole or in part, the Information Officer shall notify the requester in writing.

The notification shall include:

- the decision;
- the reasons for the refusal;
- reference to the applicable provisions of PAIA where appropriate; and
- information regarding any remedies available to the requester.

12. PROCESSING OF PERSONAL INFORMATION

12.1 General

Mufaro Employee Benefits (Pty) Ltd ("Mufaro") is committed to processing Personal Information lawfully, fairly, transparently and securely in accordance with the Protection of Personal Information Act, 4 of 2013 ("POPIA") and all other applicable legislation.

Where requests submitted in terms of the Promotion of Access to Information Act, 2 of 2000 ("PAIA") involve Personal Information, Mufaro shall consider such requests in accordance with both PAIA and POPIA to ensure an appropriate balance between the right of access to information and the constitutional right to privacy.

12.2 Lawful Processing

Mufaro processes Personal Information only where there is an appropriate legal basis to do so and for legitimate business purposes associated with the provision of employee benefits consulting, insurance intermediary services, claims administration, governance, risk management and related professional services.

Personal Information is processed in accordance with the principles of lawful processing prescribed by POPIA.

Further information regarding Mufaro's lawful processing of Personal Information is available in its publicly accessible POPIA Privacy Notice.

12.3 Categories of Personal Information

In the ordinary course of business, Mufaro may process Personal Information relating to:

- employees;
- prospective employees;
- clients;
- employers;
- retirement funds;
- insurers;
- members;
- beneficiaries;
- service providers;
- business partners; and
- other individuals where necessary for legitimate business purposes.

Depending on the nature of the services provided, Personal Information processed may include identification, contact, employment, membership, financial, banking, beneficiary, claims and medical information, where lawfully required.

12.4 Protection of Personal Information

Mufaro maintains appropriate administrative, technical and physical safeguards designed to protect Personal Information against:

- unauthorised access;
- unlawful disclosure;
- accidental loss;
- misuse;
- alteration;
- destruction; and
- other reasonably foreseeable risks.

Information Security controls supporting the protection of Personal Information are governed by Mufaro's Information Security Framework.

12.5 Rights of Data Subjects

Data Subjects enjoy various rights under POPIA, including the right to:

- be informed regarding the collection and processing of their Personal Information;
- request access to their Personal Information;
- request correction of inaccurate information;
- request deletion of information where permitted by law;
- object to certain processing activities where applicable;
- lodge complaints with the Information Regulator.

The exercise of these rights remains subject to applicable legislative requirements.

Further information regarding Data Subject Rights is contained within Mufaro's Data Privacy and Protection Policy.

12.6 Disclosure of Personal Information

Mufaro will only disclose Personal Information where:

- disclosure is authorised by law;
- disclosure is necessary for the performance of contractual obligations;
- disclosure is required by a competent regulatory or judicial authority;
- the Data Subject has provided appropriate consent where required; or
- another lawful basis for disclosure exists under applicable legislation.

Where requests submitted under PAIA involve Personal Information belonging to another individual, Mufaro shall carefully consider the privacy rights of that individual before deciding whether disclosure is appropriate.

Depending on the purpose of processing, Personal Information may be disclosed to retirement funds, insurers, employers, administrators, authorised medical professionals, contracted service providers, professional advisers and regulatory or statutory authorities, where such disclosure is lawful and necessary.

12.7 Retention and Secure Disposal

Personal Information is retained only for as long as necessary to fulfil lawful business purposes or to comply with legal, regulatory and contractual obligations.

Once retention periods have expired, Personal Information is securely archived or destroyed in accordance with Mufaro's **Data Retention and Destruction Policy**.

12.8 Information Security

The confidentiality, integrity and availability of Personal Information are supported through Mufaro's Information Security Governance Framework, including policies relating to:

- Information Security;
- Access Control;
- Cryptography;
- Network Security;
- Vulnerability Management;
- Physical Security;
- Third-Party Risk Management; and
- Business Continuity.

These governance documents collectively support the secure processing and protection of Personal Information throughout its lifecycle.

12.9 Cross-Border Transfers of Personal Information

Mufaro conducts its business operations in South Africa. Where Personal Information is transferred to, stored in or accessed from another country through an authorised service provider or technology arrangement, such processing shall comply with the applicable requirements of POPIA, including the safeguards prescribed for cross-border transfers.

12.10 Further Information

Additional information regarding Mufaro's processing of Personal Information, including the rights of Data Subjects and the procedures for submitting privacy-related enquiries, is available in the POPIA Privacy Notice published on Mufaro's website.

13. AVAILABILITY OF THIS MANUAL

13.1 General

This Promotion of Access to Information Act (PAIA) Manual has been prepared in accordance with the requirements of the Promotion of Access to Information Act, 2 of 2000 ("PAIA") and is made available to promote transparency and facilitate lawful access to information held by Mufaro Employee Benefits (Pty) Ltd ("Mufaro").

The Manual is available to clients, employees, regulators, business partners and members of the public.

13.2 Availability

This Manual may be obtained through one or more of the following channels:

- Mufaro's official website;
- The Information Officer upon request;
- Mufaro's principal place of business during normal business hours; and
- Any other reasonable means determined by Mufaro from time to time.

The Manual shall be provided in a reasonable format, subject to operational practicality and applicable legislative requirements.

13.3 Electronic Version

The most current approved version of this Manual shall be maintained electronically.

Where the Manual is published on Mufaro's website, the electronic version shall be regarded as the official public version.

Printed copies are regarded as uncontrolled copies and users should ensure that they are referring to the latest approved version.

13.4 Language

This Manual has been prepared in English.

Where reasonably practicable, Mufaro may provide reasonable assistance to individuals requiring clarification regarding the contents of this Manual.

The availability of translated versions shall be subject to operational requirements and applicable legislative obligations.

13.5 Amendments

Mufaro reserves the right to amend this Manual from time to time to:

- comply with legislative or regulatory changes;
- reflect changes to business operations;
- improve governance practices;
- maintain accuracy;
- incorporate guidance issued by the Information Regulator.

The most recent approved version shall replace all previous versions.

13.6 Questions or Enquiries

Any questions relating to this Manual, requests for access to information or enquiries regarding the processing of Personal Information should be directed to the Information Officer using the contact details provided in **Section 5** of this Manual.

14. REVIEW, APPROVAL AND DOCUMENT CONTROL

14.1 Review of this Manual

This Manual shall be reviewed at least annually, or more frequently where necessary, to ensure that it remains accurate, relevant and compliant with applicable legislative and regulatory requirements.

A review may also be initiated where there are:

- amendments to the Promotion of Access to Information Act, 2 of 2000 ("PAIA");
- amendments to the Protection of Personal Information Act, 4 of 2013 ("POPIA");
- amendments to applicable Regulations or guidance issued by the Information Regulator;
- material changes to Mufaro's business operations;
- changes to organisational structures or governance arrangements;
- recommendations arising from audits, compliance reviews or risk assessments; or
- any other circumstance that may affect the accuracy or effectiveness of this Manual.

14.2 Approval

This Manual shall be approved by the appropriate governance authority within Mufaro Employee Benefits (Pty) Ltd.

Approval may be granted by:

- the Board of Directors;
- the Executive Committee; or
- another appropriately delegated authority.

Following approval, this Manual shall become the official PAIA Manual of Mufaro Employee Benefits (Pty) Ltd.

14.3 Responsibility for Maintenance

The Information Officer shall be responsible for maintaining this Manual and ensuring that it:

- remains current;
- accurately reflects Mufaro's business operations;
- complies with applicable legislation;
- is made available as required by PAIA; and
- is reviewed in accordance with this section.

The Information Officer may delegate administrative responsibilities to appropriately authorised personnel while retaining overall accountability for the Manual.

14.4 Version Control

Only the latest approved version of this Manual shall be regarded as the official version.

Superseded versions shall be retained in accordance with Mufaro's Data Retention and Destruction Policy and Mufaro's document management procedures.

All amendments shall be recorded in the Document Revision History.

14.5 Document Revision History

Version	Effective Date	Summary of Changes	Approved By
1.0	June 2026	Initial Issue	Rohine Singh
2.0	November 2026	Updated public privacy references, Information Officer details, request timeframes, POPIA disclosures	Rohine Singh

Subsequent revisions shall be recorded in this register to provide an audit trail of amendments made to this Manual.

14.6 Related Governance Documents

This Manual forms part of Mufaro's broader Governance, Risk Management, Information Security and Privacy Framework.

The organisation maintains internal policies and procedures supporting the lawful management, protection, retention and disclosure of information.

Mufaro's publicly available POPIA Privacy Notice provides further information regarding its privacy practices and the rights of individuals under POPIA.

14.7 Statement of Commitment

Mufaro Employee Benefits (Pty) Ltd is committed to promoting transparency, accountability and responsible information governance in accordance with the Promotion of Access to Information Act, 2 of 2000 ("PAIA"), the Protection of Personal Information Act, 4 of 2013 ("POPIA") and all other applicable legislation.

The organisation recognises the importance of balancing the constitutional right of access to information with the protection of confidential and Personal Information entrusted to it by clients, retirement funds, insurers, employers, members, beneficiaries, employees and other stakeholders.

Through the implementation of this Manual and its supporting governance framework, Mufaro seeks to ensure that requests for access to information are managed fairly, consistently, transparently and in accordance with applicable legal and regulatory requirements.

APPENDIX A

PRESCRIBED PAIA REQUEST FORM

In accordance with the Promotion of Access to Information Act, 2 of 2000 ("PAIA"), requests for access to records held by Mufaro Employee Benefits (Pty) Ltd ("Mufaro") must be submitted using the **current Prescribed Request Form** issued by the Information Regulator.

The applicable request form may be obtained from any of the following sources:

- The Information Regulator's official website: **https://inforegulator.org.za/**
- Directly from the Information Officer of Mufaro Employee Benefits (Pty) Ltd.
- Upon written request submitted to the Information Officer.

Requesters are encouraged to ensure that the most recent version of the prescribed form is used, as the Information Regulator may amend the prescribed forms and associated Regulations from time to time.

The completed request form should be submitted together with:

- appropriate proof of identity;
- proof of authority where acting on behalf of another person;
- sufficient particulars of the records requested;
- any additional information reasonably required to enable the Information Officer to process the request.

Completed requests should be submitted to the Information Officer using the contact details contained in **Section 5** of this Manual.

Requests will be processed in accordance with:

- the Promotion of Access to Information Act, 2 of 2000 (PAIA);
- the Protection of Personal Information Act, 4 of 2013 (POPIA);
- any applicable Regulations issued under PAIA; and
- Mufaro's internal information governance procedures.