



PAIA s51 Manual

Willis South Africa (Pty) Ltd

April 2019

Part A: Introduction

A1 What is the purpose of this Manual?

- A1.1 Under the Promotion of Access to Information Act 2000 (“PAIA”), Willis Towers Watson is required to grant individuals access to records held by Willis Towers Watson if that record is required by the individual to exercise or protect any legal right that individual enjoys under the law.
- A1.2 Additionally, under the Protection of Personal Information 2013 (“POPI”), Willis Towers Watson is required to be open and transparent about how Willis Towers Watson handles personal information, and allow individuals to access and correct their personal information.
- A1.3 The purpose of this Manual is to set out the information which Willis Towers Watson is legally required to disclose under PAIA and POPI, and to explain how You can exercise Your statutory rights under PAIA and POPI with respect to records and personal information handled by Willis Towers Watson.

A2 What is the status and scope of this Manual?

- A2.1 This Manual (version 1.1) was last updated on 31 March 2019 and will become effective on 1 April 2019. This Manual may be revised from time

to time to reflect changes in laws and regulations, or changes in Willis Towers Watson’s business operation.

- A2.2 This Manual applies only in respect to records and personal information held by Willis Towers Watson Group companies that operate in South Africa, namely Willis South Africa (Pty) Ltd.

A3 Who is Willis Towers Watson?

- A3.1 Willis Towers Watson is a leading global risk advisor and insurance/reinsurance broker. In South Africa, Willis Towers Watson operates through the following two entities:

Compliance Officer

Willis South Africa (Pty) Ltd
Illovo Edge
No. 1 Harries Road
Illovo
Sandton 2196
South Africa
Tel: +27 11 535 5400
Email: compliancesa@willistowerswatson.com

- A3.2 Please note that Willis South Africa (Pty) Ltd is the entity behind Willis Towers Watson’s retail insurance and employee benefits operation in South Africa.

A4 What are my rights under PAIA?

A4.1 Under PAIA, everyone has the right to access

- (1) any information held by the state; and
- (2) any information that is held by another person and that is required for the exercise or protection of any rights.

A4.2 A public body may make a request for information under PAIA only if, in making the request, the public body is acting in the public interest.

A4.3 Records Willis Towers Watson makes available under PAIA is described in Part C of this Manual. If You wish to make a request under PAIA to Willis Towers Watson, please follow the procedure described in Part B of this Manual. Please note that Your request will be subject to the applicable charges set out in Section B5.

A4.4 You can learn more about Your rights under PAIA by contacting the South African Human Rights Commission (“SAHRC”) at:

South African Human Rights Commission
Braampark Forum 3
33 Hoofd Street Braamfontein South Africa
Email: info@sahrc.org.za
Web: <http://www.sahrc.org.za>
Tel: +27 11 877 3600

A4.5 SAHRC has produced a detailed guidance on how to exercise Your rights under PAIA. This guidance (known as PAIA Section 10 Guide) is available from SAHRC, and can be accessed on SAHRC’s website.

A5 What are my rights under POPI?

A5.1 Under POPI, everyone has various rights in respect of his/her own personal information.

Your rights under POPI include Your right to ask Willis Towers Watson to:

- (1) confirm whether or not Willis Towers Watson handles Your personal information;
- (2) grant access to Your own personal information;
- (3) correct, destroy, or delete Your personal information, if Your personal information held by Willis Towers Watson is inaccurate, irrelevant, excessive, out of date, incomplete,

misleading, or was obtained illegally; or

- (4) stop using Your personal information in particular ways, for example by asking Willis Towers Watson to stop using Your personal information for direct marketing purpose.

A5.2 Further information regarding why and how Willis Towers Watson handles personal information of its job applicants, employees, temps, contractors, and other workers can also be downloaded separately from http://www.willis.co.za/willis_sa_policy/.

A5.3 Further information regarding why and how Willis Towers Watson handles personal information of its clients, insureds, claimants, and other persons who are not Willis Towers Watson’ workers is embedded in Part E of this Manual. It can also be downloaded separately from http://www.willis.co.za/willis_sa_policy/.

A5.4 If You wish to make a request to Willis Towers Watson under POPI in respect of Your personal information, please follow the procedure described in Part B of this Manual. Please note that Your request will be subject to the applicable charges set out in Section B5.

A5.5 POPI establishes a new regulator called the Information Regulator. Should you wish to contact the Information Regulator, you may do so in one of the following ways:

The Information Regulator (South Africa)

Salu Building
316 Thabo Sehume Street
Pretoria
Tel: +27 12 406 4818
Email: inforeg@justice.gov.za

Part B: Procedure for making a request under PAIA / POPI

B1 How can I make a request to Willis Towers Watson under PAIA/POPI?

B1.1 If You wish to access records held by Willis Towers Watson or wish to access/correct Your personal information, You will need to:

- (1) complete the Request Form which can be downloaded separately from http://www.justice.gov.za/forms/form_paia.htm
- (2) submit the completed Request Form by:
 - (a) emailing a scanned PDF of the completed Request Form to:
 - (i) compliancesa@willistowerswatson.com (if You wish to direct Your request at Willis Towers Watson's retail insurance and employee benefits operation)
 - (b) posting the completed Request Form to:
 - (i) **Compliance Officer**
Willis South Africa (Pty) Ltd
Illovo Edge
No. 1 Harries Road
Illovo
Sandton 2196
South Africa
(if You wish to direct Your request at Willis Towers Watson's retail insurance and employee benefits operation); and

- (3) pay the applicable Request Fee described in Section B5 below. Payment can be made via:
 - (a) bank guaranteed cheque or postal order written to Willis South Africa (Pty) Ltd; or
 - (b) EFT (direct bank transfer). If You wish to pay the applicable Request Fee via EFT, You will need to send the proof of payment together with Your request. You can obtain the details required for EFT by contacting Willis South Africa (Pty) Ltd as applicable (see Section A3.1 above for contact details).
- Unfortunately, Willis Towers Watson cannot accept payment via credit card or debit card.

B1.2 Please note that Your request will not be processed until the applicable Request Fee is paid (see Section B5.2 below).

B1.3 If You are unable to complete the Request Form (e.g. if You don't know how to write/type or if You have disability that prevents You from completing the Request Form), please contact Willis Towers Watson by telephone at

- (1) +27 11 535 5400 (if You wish to direct Your request at Willis Towers Watson's retail insurance and employee benefits operation)
- (2) +27 11 341 9600 (if You wish to direct Your request at Willis Towers Watson's reinsurance operation).

B1.4 When You complete the Request Form, please be sure to complete the form as fully as You can. Please note that Willis Towers Watson will not be able to process Your request unless You provide:

- (1) sufficient particulars to enable Willis Towers Watson to:
 - (a) identify You;
 - (b) identify the records/personal information in question; and
 - (c) ascertain the nature of Your request and the form or manner in which You require access;

- (2) if You are making a request under PAIA, sufficient explanation regarding the right You seek to exercise or protect, including a clear explanation as to why You feel that the records You request is required to exercise or protect that right; and
- (3) if You are making a request on behalf of another person, proof of the capacity in which You are making the request.

B2 How will my PAIA/POPI request be processed by Willis Towers Watson?

- B2.1** Willis Towers Watson will process Your request when the completed Request Form is received and any applicable Request Fee is paid. Subject to Section B2.2 below, Your request will normally be processed within 30 days of receipt of the completed Request Form, provided that all of the required details are properly set out in the completed Request Form.
- B2.2** If it turns out that it will take more than 30 days to process Your request (e.g. due to the volume of records/personal information that must be processed, or difficulty in accessing the relevant record/personal information), Willis Towers Watson may extend the aforementioned 30 day period in processing Your request. Should this become necessary, Willis Towers Watson will notify You.
- B2.3** Once a decision on Your request is reached, Willis Towers Watson will notify You in writing. Where Willis Towers Watson decides to:
- (1) grant access to the record/personal information requested, Willis Towers Watson will notify You how the access will be granted and what Access Fees are payable, and release the requested record/personal information upon receipt of the applicable Access Fee;
 - (2) deny access to the record/personal information requested, Willis Towers Watson will notify You of the reasons why access is denied;
 - (3) comply with Your request to correct or delete Your personal information, confirm how Your request has been or will be actioned; and
 - (4) deny Your request to correct or delete Your personal information, confirm why Your request has been denied.

B2.4 Where Your request was a request for confirmation as to whether or not Willis Towers Watson handles Your personal information (i.e. You make a request under POPI s23(1)(a)), Willis Towers Watson will give You the confirmation.

B3 What potential grounds for refusal does Willis Towers Watson have?

- B3.1** If You make a request to access records/personal information held by Willis Towers Watson, Willis Towers Watson may deny Your request where Willis Towers Watson is allowed to do so under PAIA. This could be the case, for example, where Your request:
- (1) results in unreasonable disclosure of personal information about another individual;
 - (2) results in disclosure of trade secrets, research information, or financial, commercial, scientific, technical, or other confidential information of Willis Towers Watson or a third party;
 - (3) could reasonably be expected to result in endangerment of the life or physical safety of any individual;
 - (4) is likely to prejudice or impair the security or safety of any property or the public; or
 - (5) results in breach of legal privilege.

B3.2 If You make any other request in respect of Your personal information, such as a request to correct/delete Your personal information, Willis Towers Watson may deny Your request where Willis Towers Watson is allowed to do so under POPI. This would typically be the case where POPI allows Willis Towers Watson to handle Your personal information in a particular way, and Willis Towers Watson would otherwise be prevented from providing its services.

B4 What if I'm not happy about how Willis Towers Watson handled my PAIA/POPI request?

B4.1 If You are not satisfied about the way in which Your request was handled by Willis Towers Watson (including where You are not happy about the Access Fee charged by Willis Towers Watson or the length of time Willis Towers Watson is taking to process Your request), You can make an application for relief to the Constitutional Court, the High Court or another court of similar status.

B4.2 Please note that if You wish to make an application to the court, You will need to do so within 180 days of receiving the relevant decision made by Willis Towers Watson.

B5 What are the charges applicable to my PAIA/POPI request?

B5.1 There are two types of fees which are payable under PAIA, namely Request Fee, and Access Fee.

B5.2 Request Fee is payable upon making a request to access records/personal information, and it is R57 (inclusive of VAT) for each request. You do not have to pay a Request Fee if:

- (1) You are a private individual requesting access to Your own records/personal information;
- (2) You are single and earning less than R14,812 p/a; or
- (3) You are married (or in a life partnership), and earning less than R27,192 p/a.

B5.3 Access Fee is payable in respect of records/personal information which are produced in response to Your request. Access Fee is payable by everyone who makes a request. The rate of Access Fees are as follows:

Type of activity involved in producing the record or personal information	Rate (inc. VAT)
For every photocopy of an A4-size page or part thereof.	R1.25
For every printed copy of an A4-size page or part thereof. Held on a computer or in electronic or machine readable form.	R0.86
For a copy in a computer-readable form on stiffer disk.	R8.55
For a copy in a computer-readable form on CD.	R79.80
For a transcription of visual images, for an A4-size page or part thereof.	R45.60
For a copy of visual images.	R68.40
For a transcription of an audio record, for an A4-size page or part thereof.	R22.80
For a copy of an audio record.	R34.20
Each hour or part of an hour (excluding the first hour) reasonably required to search for and prepare the record/personal information for disclosure.	R34.20

Type of activity involved in producing the record or personal information	Rate (inc. VAT)
For posting the record/personal information.	Actual postage incurred
For confirming whether or not Willis Towers Watson handles personal information of the requestor (POPI s23(1)(a) request)	Free of charge

B5.4 Please note that:

- (1) where Request Fee is payable, Your request will not be processed until You pay the Request Fee;
- (2) where Access Fee is payable, the record/personal information You requested will not be released until the Access Fee is paid; and

B5.5 Please also note that if You are not a private individual and if the search for and preparation of the record requested is in Willis Towers Watson's view likely to require more than 6 hours of work, Willis Towers Watson reserves the right to require You to pay 1/3rd of the Access Fee up front as a deposit.

Part C: Records Willis Towers Watson makes available under PAIA

C1 What records does Willis Towers Watson make available under PAIA?

C1.1 You can request access to different types of records maintained by Willis Towers Watson, including the following:

- (1) Personnel Records, including (but not limited to):
 - (a) training schedules and material;
 - (b) personal records provided by personnel;
 - (c) conditions of employment and other personnel related records; and
 - (d) correspondence relating to personnel.

NB: "Personnel" refers to any person who works for or provides services to or on behalf of Willis Towers Watson and receives or is entitled to receive remuneration and any other person who assists in carrying out or conducting the business of Willis Towers Watson, including directors, all permanent, temporary and part-time staff, as well as contract workers.

(2) Client Records, including (but not limited to):

- (a) records generated by or within Willis Towers Watson relating to its clients;
- (b) records provided by a third party (typically insurer or reinsurer) in respect of the client; and
- (c) records provided by a client to a third party acting for or on behalf of Willis Towers Watson.

NB: A "client" refers to any natural or juristic entity that Willis Towers Watson performs services for and by whom Willis Towers Watson receives remuneration from by virtue of performing those services.

(3) Company Records, including (but not limited to):

- (a) financial records;
- (b) operational records;
- (c) IT-related records;
- (d) communication;
- (e) administrative records;
- (f) internal Policies and Procedures;
- (g) statutory records; and
- (h) HR records (not being Personnel Records).

NB: Company Records typically encompass records which pertain to Willis Towers Watson's own internal business affairs.

(4) Third Party Records – records held by Willis Towers Watson pertaining to other parties (not being Personnel Records or Client Records), including (but not limited to):

- (a) Financial records, correspondence, contractual records and records provided by the other party.
- (b) Personnel, customer or company records which are held by another party, as opposed to the records held by Willis Towers Watson itself.

(5) Records available in accordance with various legislation, including (but not limited to):

- (a) The Financial Advisory and Intermediary Service Act 37 of 2002;
- (b) Short-Term Insurance Act 53 of 1998;
- (c) Companies Act 71 of 2008;
- (d) The Employment Equity Act;
- (e) The Basic Conditions of Employment Act 75 of 1997;
- (f) The Labour Relations Act 66 of 1995;
- (g) Promotion of Access to Information Act 2 of 2000; and
- (h) Protection of Personal Information Act 4 of 2013.

Part D: Workers Privacy Notice

Privacy Notice for Job Applicants, Associates, Temps, Contractors, and other Workers Version 1.1, 31 March 2019. Further information regarding the Workers Privacy Notice can be found at http://www.willis.co.za/willis_sa_policy/

Part E: Client Privacy Notice

Privacy Notice for Clients, Insureds, and Claimants Version 1.1, 31 March 2019. Further information regarding the Workers Privacy Notice can be found at http://www.willis.co.za/willis_sa_policy/

About Willis Towers Watson

Willis Towers Watson (NASDAQ: WLTW) is a leading global advisory, broking and solutions company that helps clients around the world turn risk into a path for growth. With roots dating to 1828, Willis Towers Watson has 45,000 employees serving more than 140 countries and markets. We design and deliver solutions that manage risk, optimize benefits, cultivate talent, and expand the power of capital to protect and strengthen institutions and individuals. Our unique perspective allows us to see the critical intersections between talent, assets and ideas – the dynamic formula that drives business performance. Together, we unlock potential. Learn more at willistowerswatson.com.

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