

Promotion of Access to Information Manual

Aon Consulting South Africa (Pty) Limited (ACON)

Promotion of Access to Information (PAIA) Manual

1. Definitions and Interpretation

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

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

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

CEO means Chief Executive Officer;

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

DIO means Deputy Information Officer;

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

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

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

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

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

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

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

Private Body means:

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

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

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

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

- o) regardless of form or medium;
- p) in the possession or under the control of that Private Body; and
- q) whether or not it was created by that Private Body;

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

Regulator means the Information Regulator;

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

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

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

Capitalised terms used in this Manual have the meanings ascribed thereto in section 1 of POPIA and PAIA as the context specifically requires, unless otherwise defined herein.

2. Preamble

The Promotion of Access to Information Act, 2000 (“**PAIA**”) came into operation on 23 November 2001 and the Protection of Personal Information Act, 2013 (“**POPIA**”) came into effect on 1 July 2020, subject to a 12-month grace period.

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

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

3. Purpose of the PAIA Manual

The purpose of this Manual is to enable the public to check the categories of records held by Aon and which records are available without a person having to submit a formal PAIA request. Have an understanding of how to make a request for access to a record as well as access the relevant contact details of the Information Officer and Deputy Information Officer who will assist the public with the records they intend to access.

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

4. Introduction

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

Contact Details

Postal address:

PO Box 78367
Sandton
2146

Physical address:

The Place, 1 Sandton Drive
Sandhurst,
Sandton,
Johannesburg
2196

Telephone numbers:

Telephone number: 0860 100 404
Website address: www.aon.co.za

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

Managing Director: Craig Kent
Telephone number: 0860 100 404
Email address: comments@aon.co.za

The Information Officer: Tanya Prozzi
Telephone number: 0860 100 404
Email address: comments@aon.co.za

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

Deputy Information Officer: Simon Chambers
Telephone number: 0860 100 404
Email address: comments@aon.co.za

Deputy Information Officer: Carmen Foster
Telephone number: 0860 100 404
Email address: comments@aon.co.za

6. Information Regulator Guide

As of 30 June 2021, the Information Regulator has taken over the regulatory mandate functions relating to the Promotion of Access to Information Act (PAIA) 2000. This follows a proclamation, by the President, of sections 110 and 114(4) of POPIA which provided for the amendment of PAIA and the effective transfer of certain functions performed by the South African Human Rights Commission (SAHRC) to the Information Regulator.

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

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

Contact details are as follows:

Post: JD House, 27 Stiemens Street,
Braamfontein,
Johannesburg,
2001.

P.O Box 31533,
Braamfontein,
Johannesburg,
2017

Telephone: 010 023 5200

Website: <https://info regulator.org.za/>

E-mail: enquiries@info regulator.org.za

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

7. Records available under other Legislation

7.1 The following information is available in terms of the following pieces of legislation. Please note this list is not exhaustive.

Legislation	Record
Basic Conditions of Employment Act 75 of 1997, Labour Relations Act 66 of 1995, Code of Good Practice on Harassment, Skills Development Levies Act 9 of 1999, Unemployment Insurance Act 63 of 2001, Skills Development Act 9 of 1998 and the Promotion of Equality and Prevention of Unfair Discrimination Act 4 of 2000	Employment records.
Companies Act 61 of 1973	CIPC records
Income Tax Act 58 of 1962, SARS Practice/General Notes and Value Added Tax Act 89 of 1991.	SARS registration and records.
Promotion of Access to Information Act 2 of 2000	PAIA Manual
Protection of Personal Information Act 4 of 2013	Registration records, Privacy Notices and Privacy Statements.

8. Information automatically available

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

8.2 Requests for these categories of information can be sent to Aon's Information Officer, whose contact details

appear in section 5 of this Manual:

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

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

9. Subjects and categories of information held by Aon

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

Category	Subject
Financial Tax and Regulatory Records	Monthly statements, annual statements, monthly management accounts, trial balances, general ledgers, income tax returns, provisional tax returns, annual budget agendas and minutes of finance meetings, invoices, cash books, cheque requests, journals, bank statements, reconciliations, debit/credit notes, ledger trial balances, foreign exchange documentation, VAT returns, asset register licenses, trademarks, service manuals, safety manuals, record of incidents, PAYE, VAT, Regional Services Levies, IRP2 and IRP5 documentation.
Company's Act and Contract documents	Memorandum and articles of association, share register, agendas, and minutes of board meetings, agendas and minutes of audit committee meetings, agendas and minutes of executive committee meetings, annual reports, service agreements and other agreements.
Operational Documents and Information	Client financial and operational documents, client business plans, note/minutes of meetings, presentation to potential clients, client documentation, general marketing and promotional information, debit/credit notes, statements, general correspondence, computer data records, minutes of client meetings, invoices, notes, authorization of payments, presentations to clients, brochures, performance records, marketing plans and strategies.
Human Resources	Offers of employment, applications for employment, contracts of employment, consultancy agreements, employee particulars, pension/provident fund application forms and death benefit beneficiary nominations, Workmen's compensation documentation, personnel policies, performance evaluations, job specifications, code of business ethics, employment equity plan, employee medical aid scheme documentation, employee pension fund documentation, disciplinary procedures and records, employee performance appraisals, loan and bursary agreements, payroll reports, training material, leave forms, Medical Schemes Act documentation, employee accreditation documentation and long service awards.
Information Technology	Software program and licensee, software application, contracts with computer suppliers and vendors, project documentation specifications, budgets, system documentation, escrow software documentation and manuals, reports and report definitions, invoices from suppliers and vendors, disaster recovery plans and procedures, all electronic documents, database systems with client information, internet connectivity, inter-company emails, Lotus Notes.

10. Procedure for requesting information not automatically available

- 10.1 A request must be made in the prescribed form as detailed in section 53 of PAIA. The procedural requirements are set out in this section. A copy of the form is attached marked **Annexure A**.
- 10.2 These forms are also electronically available from:
 - 10.2.1 Aon's Information Officer (whose contact details are in section 5 of this Manual); and
 - 10.2.2 the Information Regulator website <https://inforegulator.org.za/wp-content/uploads/2020/07/InfoRegSA-PAIA-Form02-Reg7.pdf>
- 10.3 The prescribed form should be submitted to the Information Officer at the nominated address or email address, the Information Officer shall deal with the request him/herself or hand it to a designated person to deal with the request.
- 10.4 In certain instances there is a prescribed fee (payable in advance where applicable) for requesting and accessing information in terms of PAIA. A Requester may also be called upon to pay the additional fees prescribed by regulations for searching for and compiling the information that is requested, including the costs of making copies of the information.
- 10.5 The Information Officer, as soon as reasonably possible and within thirty (30) days after the request has been received, shall decide whether or not to grant the request.
- 10.6 The Requester shall be informed of the decision by the Information Officer, including fees payable, in the manner indicated by the Requester in the prescribed Form 3, as per Regulation 8. Noting that a request for a copy of the Guide may not be refused. Please refer to **Annexure I** for a copy of the prescribed Form.
- 10.7 Notwithstanding the foregoing, Aon will advise the Requester in the manner stipulated by the Requestor in the prescribed form of:
 - 10.7.1 the access fee to be paid;
 - 10.7.2 the format in which access will be given.
- 10.8 After access is granted, actual access to the Record requested will be given as soon as reasonably possible.
- 10.9 If the Request for Access to a Record is denied, the Requester is entitled to apply to a court for relief within 180 days of notification of the decision. Such relief may include any order compelling the Record or Records requested to be made available to the Requester or for another appropriate order. The court will determine whether the Records should be made available or not. The Requester may also lodge a complaint with the Information Regulator against the refusal of the request.
- 10.10 The Requester may also approach the Information Regulator and lodge a complaint in accordance with section 74 of POPIA in the prescribed form against the access fee to be paid or the form of access granted. The details of the Information Regulator are as follows:

JD House,
27 Stiemens Street,
Braamfontein,
Johannesburg,
2001.

P.O Box 31533,
Braamfontein,
Johannesburg,
2017

Email: PAIAComplaints@inforegulator.org.za

- 10.11 Aon does not have any internal appeal procedures. As such, the decision made by the Information Officer is final and Requesters will have to exercise the external remedies at their disposal in the event that a Request for Access is refused.
- 10.12 In the event that the request is refused the Information Officer shall advise the Requester in writing, in a notice of refusal and the notice of refusal shall state the following:
 - 10.12.1 adequate reasons for the refusal;
 - 10.12.2 that the Requestor may lodge an appeal with a court of competent jurisdiction against the refusal of the request (including the period) for lodging such appeal or lodge a complaint with the Information Regulator.

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

11. Information of records not found

- 11.1 If a requested Record cannot be found or if the Records do not exist, the Information Officer shall, by way of an affidavit or an affirmation, notify the Requester that it is not possible to give access to the requested Record.

- 11.2 The affidavit or affirmation shall provide an account of all reasonable steps taken to find the Record or to determine its existence.
- 11.3 This notice will be regarded as a decision to refuse a Request for Access to the Record concerned for the purpose of PAIA.
- 11.4 If the Record should later be found the Requester shall be given access to Record in the manner stipulated by the Requester in the prescribed form unless access is refused by the Information Officer.
- 11.5 The attention of the Requester is drawn to the provisions of Chapter 4 of PAIA in terms of which Aon may refuse, on certain specified grounds, to provide information to a Requester. The grounds for refusal are set out in clause 11 below.

12. Grounds for Refusal

- 12.1 There are various grounds upon which Aon may or must refuse a Request for Access to a Record in accordance with Chapter 4 of PAIA. They are:
 - 12.1.1 the protection of Personal Information of a third person (who is a natural person, including a deceased person) from unreasonable disclosure (section 63 of PAIA);
 - 12.1.2 the protection of commercial information of a third party if the Records contain trade secrets, financial, commercial, scientific or technical information that may harm the commercial or financial interests of a third party (section 64 of PAIA);
 - 12.1.3 refusing access to a Record if disclosure would result in the breach of a duty of confidence owed to a third party (section 65 of PAIA);
 - 12.1.4 refusing access to a Record if it would jeopardise the safety of an individual or prejudice or impair certain property rights of a third person (section 66 of PAIA);
 - 12.1.5 refusing access to a Record that was produced during legal proceedings, unless that legal privilege has been waived (section 67 of PAIA);
 - 12.1.6 refusing access to a Record containing trade secrets, financial or sensitive information or any information that would put the Private Body at a disadvantage in negotiations or prejudice it in commercial competition (section 68 of PAIA);
 - 12.1.7 refusing access to a Record containing information about research being carried out or about to be carried out on behalf of a third party (section 69 of PAIA).
- 12.2 Section 70 of PAIA contains an overriding provision. Disclosure of a Record that has been requested is compulsory if it would reveal a substantial contravention of, or failure to comply with the law, or imminent and serious public safety or environmental risk and the public interest in the disclosure of the Record clearly outweighs the harm contemplated by its disclosure.

13. Protection of Personal Information that is processed by Aon

13.1 Conditions for Lawful Processing

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

a) Accountability

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

b) Processing limitation

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

c) Purpose specification

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

d) Further Processing Limitation

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

e) Information quality

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

f) Openness

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

g) Security safeguards

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

h) Data subject participation

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

13.2 Purpose of the Processing of Personal Information by Aon

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

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

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

13.4 Recipients or categories of recipients of Personal Information

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

Category of personal Information	Recipients or categories of Recipients to whom the personal information may be supplied
Operational Documents and Information, Contact details, address, names, registration and/or Banking details, Contract documents.	Various vendors or suppliers.
Contact details, address, names, registration number, Operational Documents and Information, License details, Banking details, Contract documents.	Service providers.
Company's Act and Contract documents,	Companies within Aon's group of companies.

Operational Documents and Information, Human Resources, Information Technology.	
Operational Documents and Information, Contact details, Information Technology, License details, banking details.	Insurance companies.
Financial Tax and Regulatory Records Information Technology, Human Resources, Operational Documents and Information, Returns and /or Regulatory submissions.	Regulator or Government institution (if requested).

13.5 Cross-border flows of Personal Information

13.5.1 Section 72 of POPIA provides that Personal Information may only be transferred by a Responsible Party to a third party in a foreign country outside of the Republic of South Africa in the following circumstances:

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

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

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

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

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

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

Section 11(3) of POPIA and Regulation 2 of the POPIA Regulations provides that a Data Subject may object to Processing in the prescribed form attached as **Annexure F** to this Manual where the Processing is based on one of the following grounds, unless legislation provides for such Processing:

- 13.7.1 Processing protects a legitimate interest of the Data Subject;
- 13.7.2 Processing is necessary for pursuing the legitimate interests of the Responsible Party or of a third party to whom it is supplied;
- 13.7.3 Processing is for purposes of direct marketing other than direct marketing by means of unsolicited electronic communications as referred to in section 69 of POPIA.

13.8 Request for correction or deletion of Personal Information

Section 24 of POPIA and Regulation 3 of the POPIA Regulations provides that a Data Subject may request for their Personal Information to be corrected/deleted in the prescribed form attached as **Annexure G** to this Manual.

14. Access to Health or other records

- 14.1 If the Information Officer who grants a Request for Access to a Record provided by a health practitioner in his capacity as such about the physical or mental health, or well-being:
 - 13.1.1 of the Requester; or
 - 13.1.2 if the request has been made on behalf of the person whom the Record relates, of that person.
- 14.2 If such health practitioner is of the opinion that the disclosure of the Record to the Requester would be likely to cause serious harm to such person’s physical or mental health or well-being, the Information Officer may only give access to the Record if the Requester provides that adequate provision has been made for such counselling as may be necessary in the circumstances.
- 14.3 Before access to the Record is so given to the Requester, the person responsible for such counselling must be given access to the Record.

15. Updating of Manual

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

Policy Sponsor	Title
Exco Member	Chief Legal and Compliance Counsel, South Africa, and Sub Sahara Africa
Legal & Compliance	Compliance Manager

Annexure A: REQUEST FOR ACCESS TO RECORD
 [Regulation 7]

TO: Tanya Prozzi
 The Information Officer Aon

The Place
 1 Sandton Drive
 Sandhurst, Sandton, 2196 Johannesburg

PO Box 78367
 Sandton,
 2146

Telephone: 0860 100 404

Email: comments@aon.co.za

- NOTE:**
1. Proof of identity must be attached by the requester.
 2. If requests made on behalf of another person, proof of such authorisation, must be attached to this form.

Mark with an "X"

Request is made in my own name Request is made on behalf of another person.

PERSONAL INFORMATION			
Full Names			
Identity Number			
Capacity in which request is made <i>(when made on behalf of another person)</i>			
Postal Address			
Street Address			
E-mail Address			
Contact Numbers	Tel. (B):		Facsimile:
	Cellular:		
Full names of person on whose behalf request is made <i>(if applicable)</i> :			
Identity Number			
Postal Address			

Street Address	
----------------	--

E-mail Address			
Contact Numbers	Tel. (B)		Facsimile
	Cellular		
PARTICULARS OF RECORD REQUESTED			
<i>Provide full particulars of the record to which access is requested, including the reference number if that is known to you, to enable the record to be located. (If the provided space is inadequate, please continue on a separate page and attach it to this form. All additional pages must be signed.)</i>			
Description of record or relevant part of the record:			
Reference number, if available			
Any further particulars of record			
TYPE OF RECORD <i>(Mark the applicable box with an "X")</i>			
Record is in written or printed form			
Record comprises virtual images <i>(this includes photographs, slides, video recordings, computer-generated images, sketches, etc)</i>			
Record consists of recorded words or information which can be reproduced in sound			
Record is held on a computer or in an electronic, or machine-readable form			

FORM OF ACCESS <i>(Mark the applicable box with an "X")</i>	
Printed copy of record <i>(including copies of any virtual images, transcriptions and information held on computer or in an electronic or machine-readable form)</i>	
Written or printed transcription of virtual images <i>(this includes photographs, slides, video recordings, computer-generated images, sketches, etc)</i>	
Transcription of soundtrack <i>(written or printed document)</i>	
Copy of record on flash drive <i>(including virtual images and soundtracks)</i>	
Copy of record on compact disc drive <i>(including virtual images and soundtracks)</i>	
Copy of record saved on cloud storage server	

MANNER OF ACCESS <i>(Mark the applicable box with an "X")</i>	
Personal inspection of record at registered address of public/private body <i>(including listening to recorded words, information which can be reproduced in sound, or information held on computer or in an electronic or machine-readable form)</i>	
Postal services to postal address	
Postal services to street address	
Courier service to street address	
Facsimile of information in written or printed format <i>(including transcriptions)</i>	
E-mail of information <i>(including soundtracks if possible)</i>	
Cloud share/file transfer	
Preferred language <i>(Note that if the record is not available in the language you prefer, access may be granted in the language in which the record is available)</i>	

PARTICULARS OF RIGHT TO BE EXERCISED OR PROTECTED	
<i>If the provided space is inadequate, please continue on a separate page and attach it to this Form. The requester must sign all the additional pages.</i>	
Indicate which right is to be exercised or protected	
Explain why the record requested is required for	

the exercise or protection of the aforementioned right:	

FEES	
a) A request fee must be paid before the request will be considered. b) You will be notified of the amount of the access fee to be paid. c) The fee payable for access to a record depends on the form in which access is required and the reasonable time required to search for and prepare a record. d) If you qualify for exemption of the payment of any fee, please state the reason for exemption	
Reason	

You will be notified in writing whether your request has been approved or denied and if approved the costs relating to your request, if any. Please indicate your preferred manner of correspondence:

Postal address	Facsimile	Electronic communication <i>(Please specify)</i>

Signed at _____ this _____ day of _____ 20 _____

Signature of Requester / person on whose behalf request is made

FOR OFFICIAL USE

Reference number:	
Request received by: (State Rank, Name And Surname of Information Officer)	
Date received:	
Access fees:	
Deposit (if any):	

Signature of Information Officer

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

ACON

- for risk consulting.
- for risk analysis.
- for reporting purposes.
- for purposes of communication with the Data Subject.

Employees:

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

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

Data Subject or Category of Data Subject	Description of Personal Information processed in relation to Data Subject
Employees including Company directors and job applicants	<ul style="list-style-type: none"> • Name, • Identity number, • Marital status, • Tax number, • Physical and postal address, • Emergency contact details • Identity records, • Photographs, • Reference codes, • Credit history, • Education and professional experience, • Employee travel and expense information, • Gender, • Banking details, • CV, • Driver's licence, • Payslip, • Biometric information.
Third party service providers, including medical aid providers, suppliers/ vendors	<ul style="list-style-type: none"> • Full names, • Identity numbers of natural persons and registration numbers of juristic persons; date of birth, • Contact details: physical and postal addresses; email addresses, private and work telephone numbers, • Identifying factors: gender, race, colour, marital status, age, language, • Information relating to education, • Employment and education history of a person, • Health information: health status, pregnancy, disability, • Criminal history, • Financial information, • Personal opinions, views, preferences, • Correspondence and confidential information, • Companies' constitutional documents relating to shareholder and board member obligations, • Vat registration details.
Clients, suppliers, service providers	<ul style="list-style-type: none"> • Full names, • Company information and contact details, • Biometric information, • Details for postage and parcel deliveries, • CCTV footage, • Vehicle registration number, • Vehicle details and value, • Identity number, • Passport number, expiry date of passport, • Mobile contact number, • Physical and postal addresses, • Email addresses, • Private and work telephone numbers, • Identity numbers of natural persons,

	<ul style="list-style-type: none"> • The total sum of insured of assets, • Electronic signatures, • Marital status, • National origin, • Age, • Language, • Employment, • Criminal history, • Financial information, • Companies' constitutional documents relating to shareholder and board member obligations • High-value assets subject to underwriting, • Banking details, • Information relating to education, • Employment and education history of a person, • Health information: health status, pregnancy, disability, • Religious or philosophical beliefs, • Trade union membership, • Personal opinions, views, preferences, • Correspondence and confidential information.
Visitors to Aon's websites and platforms	<ul style="list-style-type: none"> • Full names, • Company information, • Contact details, • Cookie information, • IP address, • Password and log in details, • Payment information.
Shareholders and board members of Aon	<ul style="list-style-type: none"> • Board Member photo, • Full Names and title, • Qualifications, • Employment History.
*The above list is not exhaustive and may change from time to time.	

Annexure D: CROSS-BORDER FLOWS OF PERSONAL INFORMATION

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

Annexure E: SECURITY MEASURES TO BE IMPLEMENTED BY AON

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

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

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

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

Objection to the processing of Personal Information in terms of Section 11(3) of the Protection of Personal Information Act, 2013 (ACT NO. 4 of 2013)

Regulations relating to the Protection of Personal Information, 2017 [Regulation 2(1)]

Note:

1. *Affidavits or other documentary evidence in support of the objection must be attached.*
2. *If the space provided for in this Form is inadequate, submit information as an Annexure to this Form and sign each page.*

Reference Number:

A Details of the data subject	
Surname:	
Full names:	
Identity number:	
Residential, postal or business address:	
	Code ()
Contact number(s):	
Fax number:	
E-mail address:	

B Details of responsible party	
Name and surname of responsible party (if the responsible party is a natural person):	
Residential, postal or business address:	
	Code ()
Contact number(s):	
Fax number:	
E-mail address:	

Name of public or Private Body *(if the Responsible Party is not a natural person)*:

Business address:

Code: ()

Contact number(s):

Fax number:

E-mail address:

C	Reasons

Signed at _____ this _____ day of _____ 20 _____

Signature of Data Subject (applicant)

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

Request for correction or deletion of personal information or destroying or deletion of record of personal information in terms of Section 24(1) of the Protection of Personal Information Act, 2013 (ACT NO. 4 OF 2013)

Regulations relating to the Protection of Personal Information, 2017, [Regulation 3(2)]

Note:

1. *Affidavits or other documentary evidence in support of the request must be attached.*
2. *If the space provided for in this Form is inadequate, submit information as an Annexure to this Form and sign each page.*

Reference Number

Mark the appropriate box with an "x".

Request for:

Reference Number:

- Correction or deletion of the Personal Information about the Data Subject which is in possession or under the control of the Responsible Party.
- Destruction or deletion of a Record of Personal Information about the Data Subject which is in the possession or under the control of the Responsible Party and who is no longer authorised to security the Record of information.

A Details of the data subject	
Surname:	
Full names:	
Identity number:	
Residential, postal or business address:	
	Code ()
Contact number(s):	
Fax number:	
E-mail address:	

B	Details of the responsible party	
Name and surname of responsible party (<i>if the responsible party is a natural person</i>):		
Residential, postal or business address:		
	Code ()	
Contact number(s):		
Fax number:		
E-mail address:		

Name of public or Private Body (*if the Responsible Party is not a natural person*):

Business address:

Code: ()

Contact number(s):

Fax number:

E-mail address:

C	Reasons for *Correction or deletion of the personal information about the data subject/*destruction or deletion of a record of personal information about the data subject which is in possession or under the control of the responsible party. (Please provide detailed reasons for the request) *Delete whichever is not applicable.
----------	--

Signed at _____ this _____ day of _____ 20_____

Signature

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

**TO: Tanya Prozzi
Information Officer ACON**

The Place
1 Sandton Drive
Sandhurst, Sandton, 2196
Johannesburg

PO Box 78367, Sandton, 2146

Telephone: 0860 100 404

Email: comments@aon.co.za

I,

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

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

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

Manner of collection (mark with "x"):

Personal collection	Postal address	Facsimile	Electronic communication (Please specify)

Signed at _____ this _____ day of _____ 20 _____

Signature of requester

Annexure I: OUTCOME OF REQUEST AND OF FEES PAYABLE

[Regulation 8]

Note:

1. If your request is granted the—
 - (a) amount of the deposit, (if any), is payable before your request is processed; and
 - (b) requested record/portion of the record will only be released once proof of full payment is received.
2. Please use the reference number hereunder in all future correspondence.

Reference number: _____

TO: _____

Your request dated _____, refers.

1. You requested:

Personal inspection of information at registered address of public/private body (including listening to recorded words, information which can be reproduced in sound, or information held on computer or in an electronic or machine-readable form) is free of charge. You are required to make an appointment for the inspection of the information and to bring this Form with you. If you then require any form of reproduction of the information, you will be liable for the fees prescribed in Annexure B.	
--	--

OR

2. You requested:

Printed copies of the information (including copies of any virtual images, transcriptions and information held on computer or in an electronic or machine-readable form)	
Written or printed transcription of virtual images (this includes photographs, slides, video recordings, computer-generated images, sketches, etc)	
Transcription of soundtrack (written or printed document)	
Copy of information on flash drive (including virtual images and soundtracks)	
Copy of information on compact disc drive (including virtual images and soundtracks)	
Copy of record saved on cloud storage server	

3. To be submitted:

Postal services to postal address	
Postal services to street address	
Courier service to street address	
Facsimile of information in written or printed format (including transcriptions)	
E-mail of information (including soundtracks if possible)	
Cloud share/file transfer	
Preferred language: (Note that if the record is not available in the language you prefer, access may be granted in the language in which the record is available)	

Kindly note that your request has been:

Approved

Denied, for the following reasons:

--

4. Fees payable with regards to your request:

Item	Cost per A4-size page or part thereof/item	Number of pages/items	Total
Photocopy			
Printed copy			
For a copy in a computer-readable form on:			
(i) Flash drive	R40.00		
• To be provided by requestor			
(ii) Compact disc	R40.00		
• If provided by requestor			
• If provided to the requestor	R60.00		
For a transcription of visual images per A4-size page	Service to be outsourced. Will depend on the quotation of the service provider		
Copy of visual images			
Transcription of an audio record, per A4-size	R24.00		
Copy of an audio record			
(i) Flash drive	R40.00		
• To be provided by requestor			
(ii) Compact disc	R40.00		
• If provided by requestor			
• If provided to the requestor	R60.00		
Postage, e-mail or any other electronic transfer:	Actual costs		
TOTAL:			

5. Deposit payable (if search exceeds six hours):

Yes

No

Hours of search	Amount of deposit (calculated on one third of total amount per request)

The amount must be paid into the following Bank account:

Name of Bank: _____
 Name of account holder: _____
 Type of account: _____
 Account number: _____
 Branch Code: _____
 Reference Nr: _____
 Submit proof of payment to: _____

Signed at _____ this _____ day of _____ 20 _____

 Information officer