

DIGNITY GROUP (Pty) Limited

Registration Number: 2017/085106/07

("the Company")

MANUAL

Published in terms of the Promotion of Access to Information Act, No. 2 of 2000

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## **1. INTRODUCTION**

- 1.1 Dignity Group is a registered Financial Service Provider with FSP 44875. This information manual is published in terms of Section 14 of the Promotion of Access to Information Act No. 2 of 2000 hereinafter referred to as the ("the Act"). This policy explains how you can submit requests for access or corrections to records in terms of the Promotion of Access to Information Act 2 of 2000 (the Act).
- 1.2 The Act gives effect to the provisions of Section 32 of the Constitution which provides for the right to access to information held by another person that is required for the exercise and/or protection of rights under this Act.
- 1.3 The purpose of this manual is to foster and nurture a culture of transparency and accountability by affording any person the right of access to information to enable them to exercise and protect all their rights to the full extent.
- 1.4 The purpose of this Manual is to set out procedures to be followed and criteria that must be met by any person to request access to records in the possession or under the control of the company.

## **2. AVAILABILITY OF THIS MANUAL**

This manual can be accessed on our website at [www.dignitygroup.co.za](http://www.dignitygroup.co.za) or by requesting a copy by email from the Information Officer at [compliance@dignitygroup.co.za](mailto:compliance@dignitygroup.co.za).

## **3. FUNCTIONS AND STRUCTURE OF DIGNITY GROUP**

Dignity group's main purpose is to provide administrative assistance for funeral and health cover to our clients covering the Eastern Cape, Free State, Gauteng, Kwa Zulu Natal, Limpopo, Northwest, Northern Cape, and Western Cape.

## **4. COMPANY CONTACT DETAILS**

Persons designated/duly authorised persons:

Information Officer - Pauline Kariuki

Deputy Information Officer - Siliziwe Booi

## Promotion of Access to Information Act (PAIA) Manual Dignity Group

Postal address	Postnet Suite 307, Private Bag X9063, East London, 5200
Physical Address	8 Balfour Road, Unit 1 Vincent, East London, 5247
Telephone number	0861 777 100
Fax number	086 600 0476
Email	compliance@dignitygroup.co.za

### 5. GUIDE ON HOW TO USE THE ACT

A guide to the Act and the rights of requesters is available from the <https://www.justice.gov.za/inforeg/> website. The South African Human Rights Commission has compiled a section on PAIA which contains information as may reasonably required by a person who wishes to exercise any right contained in the Act.

The guide is available on the South African Human Rights Commission website at [www.sahrc.org.za](http://www.sahrc.org.za). Any queries on PAIA and POPIA may be directed to:

<b>PAIA</b>	<b>POPIA</b>
South African Human Rights Commission Promotion of Access to Information Act Unit Research and Documentation Department Private Bag 2700 Houghton Johannesburg 2041	Information Regulator
Braampark, Forum 3 33 Hoofd Street Braamfontein Johannesburg 2001	JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001
Telephone number: (011) 484 8300 Fax number: (011) 484 7146/7 Website: <a href="http://www.sahrc.org.za">www.sahrc.org.za</a> E-mail: <a href="mailto:PAIA@sahrc.org.za">PAIA@sahrc.org.za</a>	Website: <a href="http://www.justice.gov.za/inforeg">www.justice.gov.za/inforeg</a> E-mail: <a href="mailto:inforeg@justice.gov.za">inforeg@justice.gov.za</a>

## 6. COMPANY RECORDS

**6.1** Dignity Group will treat all your personal records as confidential, even if you are no longer a client of ours. As a rule, we will not share anything about your personal information including other persons and or companies. By law, there are only four exceptional situations when we will share your information without written permission.

### **Records available in accordance with other legislation**

The Company has records available in terms of various laws, including:

- Administration of Estates Act 66 of 1965
- Basic Conditions of Employment Act 75 of 1997
- Broad-Based Black Economic Empowerment Act 53 of 2003
- Companies Act 71 of 2008
- Consumer Protection Act 68 of 2008
- Compensation for Occupational Injuries and Disease Act 130 of 1993
- Electronic Communications and Transactions Act 25 of 2002
- Employment Equity Act 55 of 1998
- Labour Relations Act 66 of 1995
- Financial Advisory and Intermediary Services Act 37 of 2002
- Safety Act 85 of 1993
- Financial Intelligence Centre Act 38 of 2001
- Cybercrimes Act 19 of 2020
- Income Tax Act 58 of 1962
- Prevention of Organised Crime Act 121 of 1998
- Promotion of Access to Information Act 2 of 2000
- Skills Development Act 9 of 1999
- Trademarks Act 194 of 1993
- Unemployment Insurance Act 63 of 2001
- Value Added Tax Act 89 of 1991

### **6.2 The following steps must be considered before submitting a request:**

**6.2.1** Are you entitled to use the Act to request access?

**6.2.2** Does the information requested exist in the form of a record?

**6.2.3** Is the record in the possession or under the control of Dignity Group?

**6.2.4** is the Form of Request signed?

## **7. PROCESSING OF PERSONAL INFORMATION**

The Company takes the privacy and protection of personal information very seriously and will only process personal information in accordance with the current POPIA legislation. Accordingly, the relevant personal information privacy principles contained in POPIA relating to the processing thereof will be applied to any personal information processed by the Company.

## **8. THE PURPOSE OF PROCESSING OF PERSONAL INFORMATION BY THE COMPANY**

We process personal information for a variety of purposes, including but not limited to the following:

- to provide or manage any information, products and/or services requested by data subjects;
- to help us identify data subjects when they contact the Company;
- to maintain customer records;
- for recruitment purposes;
- for employment purposes;
- for travel purposes;
- for general administration, financial and tax purposes;
- for legal or contractual purposes;
- for health and safety purposes and compliance with COVID-19 regulations;
- to monitor access, secure and manage our premises and facilities;
- to transact with our suppliers and business partners;
- to help us improve the quality of our products and services;
- to help us detect and prevent fraud and money laundering;
- to help us recover debts;
- to carry out analysis and customer profiling; and
- to identify other products and services which might be of interest to data subjects and to inform them about our products and services.

## **9. CONSIDERING THE REQUEST**

Dignity Group may refuse a request to divulge information subject to the provisions of the Act. The grounds for refusal are outlined in Chapter 4 of part 2 of the Act, and include mandatory protection of:

**9.1.1** Commercial information of the third party

**9.1.2** Certain confidential information

**9.1.3** Safety of individuals, and protection of property

**9.1.4** Records privileged from production of legal proceedings.

**9.1.5** Economic interests and financial welfare of the Republic of South Africa and commercial activities of the public body.

**9.1.6** Certain information pertaining to operations of the public bodies.

**9.1.7** Dignity Group may also refuse requests that are frivolous and vexatious or that will lead to substantial and unreasonable diversion of resources or may cause leakage of data as ..... in the POP Act.

**9.2** A requester seeking access to information from Dignity Group or any other party, must complete the prescribed online form, submit it to the Deputy Information Officer by email to [compliance@dignitygroup.co.za](mailto:compliance@dignitygroup.co.za).

**9.3** Dignity Group may share the personal information of our data subjects for any of the purposes outlined in Section 8 of the Act, with the following:

- Dignity Group Companies in South Africa.
- Authorised service providers.
- Carefully selected business partners who provide services under our company; and
- Agents who perform services on behalf of the Company.

## **9.4 REQUEST PROCEDURE**

**9.4.1** When a form is filled, it must allow the Company to at least identify:

- The record or records requested;
- The identity or records requested;
- An email address or telephone number of the requester.

**9.4.2** The requester must also:

- State that they require the information to exercise or protect a right;
- Clearly state the nature of the right to be exercised or protected.
- The requester must also clearly set out why the record is necessary to exercise or protect a legal right.

**9.5** Dignity Group will process the request within 14 days, unless the requester has given the company special reasons for needing the information sooner subject to the approval of the Information Officer.

**9.6** Dignity Group shall use digital channels to inform the requester if we grant or deny access.

**9.7** The decision will be available on request.

**9.8** Any requests received on behalf of another person, the person requesting access to the information must submit proof that they are acting on behalf of another person, and provide capacity acting under to the reasonable satisfaction of the Deputy Information Officer.

## **10. SECURITY MEASURES TO PROTECT PERSONAL INFORMATION**

**10.1** Reasonable technical and organisational measures have been implemented for the protection of personal information processed by Dignity Group and its operators. In terms of POPIA, data processor are third parties that process personal information on behalf of the Company.

**10.2** The company continuously implements and monitors technical and organisational security measures to protect the personal information held, against unauthorised access, as well as accidental or wilful manipulation, loss, or destruction.

- 10.3** The company will take steps to ensure that data processors that process personal information on behalf of the Company apply adequate safeguards as outlined above.
- 10.4** The company will only transfer personal information across South African borders when the relevant business transactions or situation requires trans-border processing, we will do so only in accordance with POPIA requirements; or if the data subject consents to transfer of their personal information to third parties in foreign countries.
- 10.5** The company will take steps to ensure that data processors are bound by laws, binding corporate rules or agreements that provide an adequate level of protection and uphold principles for reasonable and lawful processing of personal information, in terms of POPIA.
- 10.6** The company will take steps to ensure that data processors that process personal information in jurisdictions outside of South Africa, apply adequate safeguards as outlined in section above.

## **11 FEES**

- 11.1** A requestor is required to pay the prescribed fees (R50.00) before a request will be processed;
- 11.2** If the preparation of the record requested requires more than the prescribed period (14), a deposit shall be paid (of not more than one third of the access fee which would be payable if the request were granted);
- 11.3** A requestor may lodge an application with a court against the tender/payment of the request fee and/or deposit;
- 11.4** Records may be withheld until fees have been paid.
- 11.5** Proof of payment with reference of policy number must accompany the form.
- 11.6** Please send your request using the prescribed form available on the company website at [www.dignitygroup.co.za](http://www.dignitygroup.co.za).

**11.7** Address your record to the Compliance department at [compliance@dignitygroup.co.za](mailto:compliance@dignitygroup.co.za). The above requirements apply to requests either than personal requests.

## **12. REMEDIES AVAILABLE WHEN DIGNITY GROUP REFUSES A REQUEST FOR INFORMATION**

**12.1** In the event that the requester complies with the requirements above and the Deputy Information Officer refuses to grant access to information and such refusal is not based on any grounds of refusal listed on the Act, the requester may:

**12.1.1** appeal against the decision of such Deputy Information Officer to the Information Officer.

**12.2** The requester may lodge an application to a court for further relief if not satisfied with the appeal decision of the Information Officer.