Paradigm Risk Consultants (Pty) Ltd Manual in terms of The Promotion of Access of Access to information Act 2 of 2000 (PAIA)

INTRODUCTION

We are Paradigm Risk Consultants , an authorised financial services provider (FSP) operating within the financial services industry in South Africa and registered with the Financial Sector Conduct Authority. We are licenced for Short-term Insurance: Personal and Commercial Lines.

Our client-base consists of natural persons as well as legal entities operating within South Africa, and our mission is to identify the needs of our clients and offer professional, personalised advice, service, and superior products from secure markets.

We shall use our reasonable best efforts to provide services in a commercially reasonable manner and with the care, diligence, and skill that a prudent FSP would possess and exercise.

The purpose of this Manual is to tell you what type of information we have, and where applicable help you to access our information and any other information that we have.

OUR DETAILS

Our details are as follows:

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| Registered Company Name: | Paradigm Risk Consultants (Pty) Ltd |
| Registration Number: | 2003/016279/07 |
| Date of Incorporation: | 11 March 2003 |
| FSP Number: | 4519 |
| Business Address: | 73 5th Ave Edenvale 1609 |
| Postal Address: | P O Box 4556Edenvale1610 |
| Telephone: | 011 524 0884 |
| Fax: | 011 450 4917 |
| Website: | <https://paradigmrisk.co.za/> |
| Directors: | Niall AthertonRoss McCrorie |

We have appointed one information officer for our company.

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| Information Officer | Mr Ross McCrorie |
| Business and Postal Address | Same as above |
| Contact details | <https://paradigmrisk.co.za/>Telephone: 011 524 0884 |

THE ACT

* Some key objectives of the Promotion of Access to Information Act (PAIA) are to promote transparency, accountability and effective governance of all public and private bodies.
* The Information Regulator is responsible for the regulatory mandate functions relating to PAIA.
* PAIA grants a requester access to records of our company, if the record is required for the exercise or protection of any rights. If a public body lodges a request, the public body must be acting in the public interest.
* Requests in terms of PAIA shall be made in accordance with the prescribed procedures, at the rates provided. The forms and charges are dealt with in paragraphs 6 and 7.
* Requesters are referred to the ‘Guide’ compiled by the Information Regulator, which is available in a range of official languages and contains information for the purposes of exercising constitutional rights.
* Please contact the Information Regulator or visit their website for more information on how you can get access to information under PAIA, and to access the Guide.
* The contact details of the Information Regulator are:

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| Postal address: | P.O Box 3153, Braamfontein, Johannesburg, 2017 |
| Physical address: | JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001 |
| Phone number: | 010 023 5200 |
| Website: | <https://www.inforegulator.org.za/> |
| Email Address: | inforeg@justice.gov.za (general enquiries)complaints.IR@justice.gov.za (to lodge a complaint) |

The Guide can also be made available upon request, in writing, to our information officer.

APPLICABLE LEGISLATION

The records we hold for the purposes of PAIA are in terms of various laws; the main laws are as follows, although not limited to:

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| **Ref** | **Act** |
| No 75 of 1997 | Basic Conditions of Employment Act |
| No 53 of 2003 | B-BBEE Act |
| No 55 of 1998 | Employment Equity Act |
| No 130 of 1993 | Compensation for Occupational Injuries and Disease Act |
| No 66 of 1995 | Labour Relations Act |
| No 85 of 1993 | Occupational Health and Safety Act |
| No 30 of 1996 | Unemployment Insurance Act |
| No 68 of 2008 | Consumer Protection Act |
| No 61 of 1973 | Companies Act |
| No 25 of 2002 | Electronic Communications and Transactions Act |
| No 37 of 2002 | Financial Advisory and Intermediary Services Act |
| No 121 of 1998 | Prevention of Organised Crime Act |
| No 38 of 2001 | Financial Intelligence Centre Act |
| No 12 of 2004 | Prevention & Combating of Corrupt Activities |
| No 33 of 2004 | Prevention of Constitutional Democracy Against Terrorist & Related Activities |
| No 2 of 2000 | Promotion of Access of Information Act |
| No 4 of 2013 | Protection of Personal Information Act |
| No 89 of 1991 | Value Added Tax Act |
| No 19 of 2020 | Cybercrimes Act |

ACCESS TO RECORDS AND AVAILABILITY

We hold the following subjects and categories of records.

Please be advised that, as specified below, not all records are automatically available. The method of requesting information is detailed further on in this Manual.

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| Records | Subject | Availability |
| Public Affairs | Information on our services Marketing materialPublic corporate records  Media releases | Freely available on our website and these records can also be requested from our office. |
| Company and Business  | Financial statementsFinancial and tax records (Company & Employees)Banking details and recordsAsset registerShare registerManagement accountsFinance agreementsRental agreementsInsurance arrangementsMinutes of directors’ meetingsRecords relating to the appointment of directors, auditor, etc.Operational records and internal correspondenceStandard operating procedures and company policies | Not automatically available. We are a Proprietary Limited – and we are not required to disclose this information or make it freely available |
|   | Documents of incorporationDirectors’ names | Available from CIPC (Companies and Intellectual Property Commission) |
| Personnel | Records relating to current and previous staffContractual agreements with service providers and consultants | Not automatically available |
| Client information | Details about our clients, their contact information, their personnel where applicable, and our services and communications to them | Not automatically available |

Description of the categories of data subjects (the individual to which the information relates) and of the information or categories of information relating thereto, in terms of the information we process:

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| --- | --- |
| **Categories of Data Subjects** | **Personal Information that may be processed includes** |
| Service providers and consultants | Names, registration numbers, vat numbers, address, trade secrets and bank details. |
| Employees | Name, address, phone and personal e-mail contact, qualifications, salary, bank details, gender, race, religion, next of kin, medical details, and disciplinary matters. |
| Directors | Same as ‘Employees’ |
| Our clients | Domestic and Commercial policyholders:Name, ID number, company registration number, details of directors, e-mail address, physical address, telephone and cell phone numbers, details of assets with the risk address and security details, banking details, credit card details where applicable, finance arrangements, financial statements, claims history. Body corporate business: managing agents, trustees, and owners' details (name and surname), bond details. Engineering business: architectural plans, bill of quantities, scope of work. Marine: bill of lading and shipping agent details. |

Our purposes for processing personal information, who we share information with, any transborder flows of such information, as well as our information security measures are detailed within our Privacy Policy, which is available on our website.

HOW TO REQUEST ACCESS TO RECORDS

To facilitate the processing of your request, kindly:

Use the prescribed form, available on the website of the Information Regulator at <https://www.inforegulator.org.za/> under the section ‘Documents / Forms’.

Address your request to our Information Officer.

1. The record(s) being requested;
2. The requester (and if an agent is lodging the request, proof of capacity);
3. The form of access required;
	1. The postal address, email address or fax number of the requester in the Republic;
	2. If the requester wishes to be informed of the decision in any manner (in addition to written), the manner and particulars thereof;
4. The right which the requester is seeking to exercise or protect with an explanation of the reason the record is required to exercise or protect the right.

All requests will be carefully considered in terms of PAIA. Our Information Officer will notify you in writing as to whether your request for access has been approved or denied. You will receive such notification within 30 days after we have received the fully completed request form.

Please note that in certain cases, we may refuse you access to the requested record/s in order to protect others. This can include the following instances where we have a duty to:

* Protect the privacy of a third party
* Protect confidential information in terms of an agreement
* Protect the privacy and safety of a person or a juristic person
* Protect information in legal proceedings

You will however be notified of the reasons in writing should we refuse to provide the requested record/s to you.

If your request for access is denied or we do not handle your request in an acceptable manner, and after allowing us the opportunity to respond to and attempt to resolve the issue, you are still dissatisfied, you may lodge a complaint with the Information Regulator by completing a Complaint Form and submitting it to PAIAComplaints@inforegulator.org.za, or you can complete the online complaint form available at <https://www.justice.gov.za/inforeg/> The Complaint Form is available on the website of the Information Regulator at <https://www.inforegulator.org.za/> under the section ‘Documents / Forms’.

PRESCRIBED FEES

You will be required to pay a fee to us, as stipulated by law, before your request is considered or the records that you have requested are made available to you. Records may be withheld until the applicable fee/s have been paid. You may have to pay a further access fee for any time that has exceeded the prescribed hours to search and prepare the requested record/s.

The prescribed fees are set out in Annexure B of the *Regulations relating to the Promotion of Access to Information, 2021*, as issued by the Department of Justice and Constitutional Development. A copy of the Regulations can be made available upon request to our Information Officer.

AVAILABILITY OF OUR MANUAL

Our Manual, in English, is available on our website, and at our company office.

UPDATES TO OUR MANUAL

We may update this Manual at any time and without notice to you whenever we make material changes to the current information, by publishing an updated version on our website, and from the stated revision date our amended Manual will then be applicable.