



# Manual of General Reinsurance Africa Limited ("Gen Re" or "The Company")

Reinsurer licenced to conduct composite insurance business  
(Registration number: 1966/003833/06)

Prepared in terms of Section 51(1) of the Promotion of  
Access to Information Act 2000 ("the Act")

## THE PURPOSE

The purpose of this document is to serve as the Manual of Gen Re as required in terms of the Act, and to provide a reference as to the records held and the procedures that need to be followed to request access to such records.

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## PREAMBLE

The Promotion of Access to Information Act No. 2 of 2000, ("the Act") came into operation on 23 November 2001. Section 51 of this Act requires that we as a private body compile a manual giving information to the public regarding the procedure to be followed in requesting information from us for the purpose of exercising or protecting rights.

## INTRODUCTION TO THIS PRIVATE BODY

Gen Re is responsible for providing professional reinsurance services to the Company's clients in all classes of reinsurance business, the Prudential Authority has licensed the Company to conduct, in a manner consistent with global best practice. Gen Re is a wholly owned subsidiary General Reinsurance AG, which is incorporated in Germany. The company's ultimate holding company is Berkshire Hathaway Inc., which is incorporated in the USA.

Gen Re as a private body has compiled this manual, not only to comply with the provisions of the Act, but also to foster a culture of transparency and accountability in our environment and to ensure that members of the public have effective access to information in our possession which will assist them in the exercise and protection of their rights.

The manual describes the categories of information which Gen Re possesses. You will also be shown the correct procedure to follow should you require access to any of this information.

## 1 LIST OF ACRONYMS AND ABBREVIATIONS

- 1.1 "MD" Managing Director
- 1.2 "DIO" Deputy Information Officer;
- 1.3 "IO" Information Officer;
- 1.4 "Minister" Minister of Justice and Correctional Services;
- 1.5 "PAIA" Promotion of Access to Information Act No. 2 of 2000 (as Amended);
- 1.6 "POPIA" Protection of Personal Information Act No.4 of 2013;
- 1.7 "Regulator" Information Regulator; and
- 1.8 "Republic" Republic of South Africa

## 2 PURPOSE OF PAIA MANUAL

This PAIA Manual is useful for the public to –

- 2.1 check the categories of records held by a body which are available without a person having to submit a formal PAIA request;
- 2.2 have a sufficient understanding of how to make a request for access to a record of the body, by providing a description of the subjects on which the body holds records and the categories of records held on each subject;
- 2.3 know the description of the records of the body which are available in accordance with any other legislation;
- 2.4 access all the relevant contact details of the IO and DIO who will assist the public with the records they intend to access;
- 2.5 know the description of the guide on how to use PAIA, as updated by the Regulator and how to obtain access to it;
- 2.6 know if the body will process personal information, the purpose of processing of personal information and the description of the categories of data subjects and of the information or categories of information relating thereto;
- 2.7 know the description of the categories of data subjects and of the information or categories of information relating thereto;
- 2.8 know the recipients or categories of recipients to whom the personal information may be supplied;
- 2.9 know if the body has planned to transfer or process personal information outside the Republic of South Africa and the recipients or categories of recipients to whom the personal information may be supplied; and
- 2.10 know whether the body has appropriate security measures to ensure the confidentiality, integrity and availability of the personal information which is to be processed.

## 3 KEY CONTACT DETAILS FOR ACCESS TO INFORMATION OF GENRE

- 3.1 Joint Managing Director  
Name: Cindy Blanchard  
Tel: +27 21 412 7749  
Email: cindy.blanchard@genre.com
- 3.2 Authorised Information Officer  
Name: Jacqueline Wessels  
Tel: +27 21 412 7753  
Email: jacqueline.wessels@genre.com

- 3.3 Deputy Information Officers  
Name: Thea Weyers  
Tel: + 27 21 412 7724  
Email: thea.weyers@genre.com  
Name: Cheryl Stewart  
Tel: + 27 21 412 7753  
Email: cheryl.stewart@genre.com  
Name: Sharon Burton  
Tel: + 27 21 412 7742  
Email: sburton@genre.com  
Name: Shamen Raja  
Tel: + 27 412 7720  
Email:shamen.raja@genre.com  
Name:Janine Laubscher  
Tel: + 27 21 412 7707  
Email: janine.laubscher@genre.com  
Name:John Clur  
Tel: + 27 21 412 7762  
Email: john.clur@genre.com  
Name: Michael Prodehl  
Tel: + 27 21 412 7752  
Email: michael.prodehl@genre.com  
Name: Heather Thurtell  
Tel: + 27 21 412 7732  
Email: heather.thurtell@genre.com  
Name: Jason Cooper-Williams  
Tel: +27 21 412 7747  
Email: jason.cooper-williams@genre.com  
Name: Saulose Lemphane  
Tel: + 27 10 276 0006  
Email: saulose.lemphane@genre.com
- 3.4 Access to information general contacts  
Email: informationofficer\_sa@genre.com
- 3.5 National or Head Office  
Postal Address: PO Box 444  
Cape Town 8000  
Physical Address: 2nd Floor Waterway House North  
3 Dock Road V&A Waterfront  
Cape Town 8001  
Telephone: +27 21 412 7700  
Website: www.genre.com

## 4 GUIDE ON HOW TO USE PAIA AND HOW TO OBTAIN ACCESS TO THE GUIDE

- 4.1. The Regulator has, in terms of section 10(1) of PAIA, as amended, updated and made available the revised Guide on how to use PAIA ("Guide"), in an easily comprehensible form and manner, as may reasonably be required by a person who wishes to exercise any right contemplated in PAIA and POPIA.
- 4.2. The Guide is available in each of the official languages and in braille.
- 4.3. The aforesaid Guide contains the description of –
  - 4.3.1. the objects of PAIA and POPIA;
  - 4.3.2. the postal and street address, phone and fax number and, if available, electronic mail address of –

- 4.3.2.1. the Information Officer of every public body, and
- 4.3.2.2. every Deputy Information Officer of every public and private body designated in terms of section 17(1) of PAIA and section 56 of POPIA;
- 4.3.3. the manner and form of a request for –
- 4.3.3.1. access to a record of a public body contemplated in section 1; and
- 4.3.3.2. access to a record of a private body contemplated in section 50;
- 4.3.4. the assistance available from the IO of a public body in terms of PAIA and POPIA;
- 4.3.5. the assistance available from the Regulator in terms of PAIA and POPIA;
- 4.3.6. all remedies in law available regarding an act or failure to act in respect of a right or duty conferred or imposed by PAIA and POPIA, including the manner of lodging –
- 4.3.6.1. an internal appeal;
- 4.3.6.2. a complaint to the Regulator; and
- 4.3.6.3. an application with a court against a decision by the information officer of a public body, a decision on internal appeal or a decision by the Regulator or a decision of the head of a private body;
- 4.3.7. the provisions of sections 14 and 51 requiring a public body and private body, respectively, to compile a manual, and how to obtain access to a manual;
- 4.3.8. the provisions of sections 15 and 52 providing for the voluntary disclosure of categories of records by a public body and private body, respectively;
- 4.3.9. the notices issued in terms of sections 22 and 54 regarding fees to be paid in relation to requests for access; and
- 4.3.10. the regulations made in terms of section 92.
- 4.4. Members of the public can inspect or make copies of the Guide from the offices of the public and private bodies, including the office of the Regulator, during normal working hours.
- 4.5. The Guide can also be obtained –
- 4.5.1. upon request to the IO;
- 4.5.2. from the website of the Regulator (<https://www.justice.gov.za/inforeg/>).
- 4.6. A copy of the Guide is also available in the following two official languages, for public inspection during normal office hours –
- 4.6.1. Zulu and Sotho

## 5 CATEGORIES OF RECORDS OF GEN RE WHICH ARE AVAILABLE WITHOUT A PERSON HAVING TO REQUEST ACCESS

Category of records	Types of the Record	Available on Website	Available upon request
Public Affairs	Public Product Information		X
	Public Corporate Records		X
	Published Newsletters		X
	Media Releases	X	X

## 6 DESCRIPTION OF THE RECORDS OF GEN RE WHICH ARE AVAILABLE IN ACCORDANCE WITH ANY OTHER LEGISLATION

Records are available, where applicable, in accordance with the following current South African legislation (only to the extent that the relevant Act makes disclosure of records compulsory):

- Basic Conditions of Employment Act No. 75 of 1997
- Broad Based Black Economic Empowerment Act No 75 of 1993
- Companies Act No. 71 of 2008 and Regulations
- Compensation for Occupational Injuries and Diseases Act No. 130 of 1993
- Constitution of the Republic of South Africa Act No 108 of 1996
- Copyright Act No.98 of 1978
- Consumer Protection Act No. 68 of 2008
- Customs and Excise Act No. 91 of 1964
- Cyber Crimes Act 19 of 2020
- Conduct of Financial Institutions Bill
- Electronic Communications and Transactions Act, No. 25 of 2002
- Employment Equity Act No. 55 of 1998
- Financial Intelligence Centre Act No. 38 of 2001
- Financial Sector Regulation Act 9 of 2017
- Income Tax Act No. 58 of 1962
- Insurance Act 18 of 2017
- Labour Relations Act No. 66 of 1995
- Long-term Insurance Act No. 52 of 1998
- Occupational Health and Safety Act No. 85 of 1993
- Pension Funds Act No. 24 of 1956
- Policy Protection Rules
- Prevention of Organised Crime Act 121 of 1998
- Promotion of Access to Information Act, No. 2 of 2000
- Promotion of Equality and Prevention of Unfair Discrimination Amendment Act 52 of. 2002
- Protection of Constitutional Democracy against Terrorist and Related Activities Act 33 of 2004
- Protection of Personal Information Act 4 of 2013
- Short-term Insurance Act No. 53 of 1998
- Skills Development Act No. 9 of 1999
- Unemployment Insurance Act No. 63 of 2001
- Value-added Tax Act No. 89 of 1991

## 7 DESCRIPTION OF THE SUBJECTS ON WHICH THE BODY HOLDS RECORDS AND CATEGORIES OF RECORDS HELD ON EACH SUBJECT BY GEN RE

Subjects on which the body holds records	Categories of records
Strategic Documents, Plans, Proposals	Annual Reports, Strategic Plan, Annual Performance Plan
Human Resources	<ul style="list-style-type: none"> <li>- HR policies and procedures</li> <li>- Advertised posts</li> <li>- Employment Applications</li> <li>- Employment Contracts</li> <li>- Personal Information of Employees</li> <li>- Employment Equity Plan</li> <li>- Medical Aid Records</li> <li>- Pension Fund Records</li> <li>- Disciplinary Records</li> <li>- Performance Management Records</li> <li>- Salary Records</li> <li>- Employee Benefit Records</li> <li>- PAYE Records</li> <li>- Seta Records</li> <li>- Disciplinary Code</li> <li>- Leave Records</li> <li>- Training Records</li> <li>- Training Materials</li> </ul>
Finance	<ul style="list-style-type: none"> <li>- Financial Statements</li> <li>- Financial and Tax Records</li> <li>- Asset Register</li> <li>- Management Accounts and Reports</li> <li>- Vouchers, Cash Books and Ledgers</li> <li>- Banking Records and Statements</li> <li>- Electronic Banking Records</li> </ul>
Marketing	<ul style="list-style-type: none"> <li>- Market Information</li> <li>- Product Brochures</li> <li>- Advertisements</li> <li>- Field Records</li> <li>- Performance Records</li> <li>- Product / Service Sales Records</li> <li>- Marketing Strategies</li> </ul>
Legal	<ul style="list-style-type: none"> <li>- Complaints, pleadings, briefs and other documents pertaining to any litigation, arbitration or investigation</li> <li>- Settlement agreements</li> <li>- Material licences, permits and authorisations</li> </ul>

Subjects on which the body holds records	Categories of records
Client	<ul style="list-style-type: none"> <li>- Client Database</li> <li>- Client agreements</li> <li>- Client Files</li> <li>- Client Instructions</li> <li>- Client Correspondence</li> </ul>
Third Party	<ul style="list-style-type: none"> <li>- Rental agreements</li> <li>- Non-disclosure agreements</li> <li>- Letters of Intent</li> <li>- Supplier Contracts</li> <li>- Data Processing Agreements</li> </ul>

## 8. PROCESSING OF PERSONAL INFORMATION

### 8.1 Purpose of Processing Personal Information

Gen Re is a reinsurer licensed to conduct composite reinsurance business.

Gen Re is required to process personal information in order to conduct its business operations specifically within the (re)insurance sector. For the purposes of POPIA, Gen Re is a Responsible Party as it determines the purpose of and means for processing personal information.

POPIA provides for the lawful processing of personal information by a Responsible Party subject to the following principles: Accountability, Processing Limitation, Purpose specification, Further Processing Limitation, Information Quality, Openness, Security Safeguards and Data Subject Participation.

8.2 Description of the categories of Data Subjects and of the information or categories of information relating thereto

Subjects on which the body holds records	Personal Information that may be processed
Clients	- Name, registration numbers and bank details
Service Providers	- Name, registration number, VAT numbers, address, trade secrets and bank details
Employees	<ul style="list-style-type: none"> <li>- Name, identity number, address and contact details, including email address and telephone number, date of birth, gender and race;</li> <li>- Terms and Conditions of employment;</li> <li>- Qualifications, skills, experience and employment history, including start and end dates, with previous employers and with the company;</li> <li>- Remuneration, including entitlement to benefits such as pensions or insurance cover;</li> <li>- Bank account details;</li> <li>- Marital status, next of kin, dependents and emergency contacts;</li> <li>- Nationality and entitlement to work in the RSA;</li> <li>- Criminal and credit record;</li> <li>- Leave accrual, periods of leave taken by you and the reasons for the leave;</li> <li>- Details of any disciplinary or grievance procedures in which you have been involved, including any warnings issued to you and related correspondence;</li> <li>- Assessments of performance, including appraisals, performance reviews and ratings, performance improvement plans and related correspondence;</li> <li>- Details of trainings attended and completed, including results;</li> <li>- Information about medical or health conditions, including disability for which the company needs to make reasonable adjustments;</li> <li>- Health and medical related records (for example details of your vaccination); and</li> <li>- Equal opportunities monitoring information</li> </ul>
Third Parties	- Name, address, registration numbers or identity numbers, bank details, communication data

Subjects on which the body holds records	Personal Information that may be processed
Insured, Policy Holder, beneficiary	<ul style="list-style-type: none"> <li>- Personal details, e.g. name, profession and date of birth;</li> <li>- Business details e.g. name and registration number;</li> <li>- Insurance Contract based information;</li> <li>- Claims related information;</li> <li>- Health information, e.g. your medical history; and</li> <li>- Financial information, e.g. payment history and credit score.</li> </ul>

8.3 The recipients or categories of recipients to whom the personal information may be supplied

Category of personal information	Recipients or Categories of Recipients to whom the personal information may be supplied
Identity number and names, for criminal checks	South African Police Services
Qualifications, for qualification verifications	South African Qualifications Authority
Credit and payment history, for credit information	Credit Bureaus
Employee number, gender, race, age, job title, job grade, remuneration and benefits information	Salary Benchmarking Service Provider
Employee names, employee numbers, employee salary information, ID numbers, medical aid information, DOB, tax numbers, addresses	Payroll administrator
Policyholder information and medical records	Assessors / medical experts for the drawing up of expert opinions on underwriting and claims management
Client data, vendor data, employee data for the storage and destruction of files	Data management service providers
All Personal information for employees, client data, vendor data for the maintenance, operation and securing of systems and applications, data recovery and data destruction	IT service providers
All Personal information for employees, client data and vendor data to perform internal audits and certain IT security audits	Audit service providers

#### 8.4 Planned transborder flows of personal information

Some of the recipients we transmit personal information to (see Section 5 above) are located outside the Republic of South Africa. Transmission may take place to a third country without your authorisation, if the recipient is subject to a law, binding corporate rules or binding company agreement which provide an adequate level of data protection. We make sure that the recipients of your personal information in any location outside South Africa comply with and fulfil South African data protection standards, i.e., by making sure appropriate technical and organizational privacy measures are in place.

Examples for the transmission of personal information to Gen Re group companies, located in third countries, include in particular the transfer to the United Kingdom, European Union member state countries, Australia and the United States. Subject to adherence with legal requirements, these transfers may include also special categories of personal data, e.g., health-related information.

#### 8.5 General description of Information Security Measures to be implemented by the responsible party to ensure the confidentiality, integrity and availability of the information

Gen Re undertakes to institute and maintain data protection measures to accomplish the objectives outlined below. The details given are to be interpreted as examples of how Gen Re achieves an adequate data protection level for each objective. Gen Re may use alternative measures and adapt to technological security development, as needed, provided that the objectives are achieved.

##### Confidentiality

###### a. Physical access control

No unauthorized access to data processing facilities, e.g.:

- magnetic or chip cards
- keys, electronic door openers,
- facility security services and/or entrance security staff,
- alarm systems,
- video/CCTV Systems

###### b. Electronic access control

No unauthorized use of the data processing and data storage systems, e.g.:

- (secure) passwords
- automatic blocking/locking mechanisms
- two-factor authentication
- encryption of data carriers/storage media

###### c. Internal access control (permissions for user rights of access to and amendment of data) No unauthorized reading, changes or deletions of data within the system, e.g.:

- rights authorization concept,
- need-based rights of access,
- logging of system access events

###### d. Isolation controls

The isolated processing of data, which is collected for differing purposes, e.g.

- multiple client support,
- session control

###### e. Pseudonymization

The processing of personal information in such a method/ way, that the data cannot be associated with a specific Data Subject without the assistance of additional information, provided that this additional information is stored separately, and is subject to appropriate technical and organizational measures.

##### Integrity

###### a. Data transfer control

No unauthorized reading, copying, changes or deletions of data with electronic transfer or transport, e.g.:

- encrypted connections
- email encryption
- virtual private networks (VPN)
- electronic signature

###### b. Data entry control

Verification, whether and by whom personal information is entered into a data processing system, is changed, or deleted, e.g.:

- event logging
- document management

##### Availability and Resilience

###### a. Availability control

Prevention of accidental or willful destruction or loss, e.g.:

- backup strategy (online/offline; on-site/off-site)
- uninterruptible power supply (UPS)
- virus protection
- firewall
- reporting procedures and contingency planning
- rapid recovery

##### Procedures for regular testing, assessment, and evaluation

###### a. Data privacy management

- A data privacy policy is documented and accessible to staff
- Documentation and continuous updating of records of processing activities
- Regular performance of data privacy trainings and execution of awareness measures
- Complete deletion / return of personal information as part of the end of the contractual Agreement can be guaranteed
- Mandatory signing of non-disclosure agreements when hiring 3rd parties

###### b. Incident response management / Data breach notification

Data breaches are quickly identified and escalated. The performed actions follow a standardized process as outlined in the Corporate Incident Response document.

c. Data Protection by Design and Default

The Gen Re's privacy by design and privacy by default guideline as well as other privacy policies and procedures enforce that data protection principles are considered from the outset of the development of new products, and when implementing new technologies, applications, and procedures.

d. Order or contract control

No third party data processing without corresponding instructions from the Responsible Party, e.g.: clear and unambiguous contractual arrangements, formalized order management, strict controls on the selection of the service provider, duty of pre- evaluation, supervisory follow-up checks.

## 9 AVAILABILITY OF THE MANUAL

9.1 A copy of the Manual is available-

9.1.1 On [www.genre.com](http://www.genre.com) , if any;

9.1.2 head office of Gen Re for public inspection during normal business hours;

9.1.3 to any person upon request and upon the payment of a reasonable prescribed fee; and

9.1.4 to the Information Regulator upon request.

9.2 A fee for a copy of the Manual, as contemplated in annexure B of the Regulations, shall be payable per each A4-size photocopy made.

## 10 UPDATING OF THE MANUAL

Gen Re will update this manual on a regular basis.

Issued by



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Cindy Blanchard  
Joint Managing Director