

**MANUAL**  
**As required in terms of Section 51 of the PROMOTION OF ACCESS TO**  
**INFORMATION ACT**  
**No. 2 of 2000 (“PAIA”)**  
**and**  
**The Protection of Personal Information Act, 4 of 2013 (“PPI)**

**This manual contains information required to request access to records held by Old Mutual (South Africa) (Pty) Limited which includes, inter alia, the following companies:**

**AGILITY BROKER SERVICES (PTY) LTD**  
**ACSIS LTD (and its subsidiaries)**  
**BLACK BROKER HOLDINGS (PTY) LTD (and its subsidiaries)**  
**CELESTIS BROKER SERVICES (PTY) LTD**  
**MASTHEAD (PTY) LTD**  
**MS LIFE ASSURANCE COMPANY LTD**  
**OLD MUTUAL ALTERNATIVE RISK TRANSFER LTD**  
**OLD MUTUAL ALTERNATIVE SOLUTIONS LTD**  
**OLD MUTUAL CAPITAL HOLDING (PTY) LTD**  
**OLD MUTUAL FINANCE (RF) (PTY) LTD**  
**OLD MUTUAL HEALTH INSURANCE LIMITED**  
**OLD MUTUAL INVESTMENT ADMINISTRATORS (PTY) LTD (and its subsidiaries)**  
**OLD MUTUAL INVESTMENT GROUP (PTY) LTD (and its subsidiaries)**  
**OLD MUTUAL PROPERTY (PTY) LTD (and its subsidiaries)**  
**OLD MUTUAL INVESTMENT SERVICES (PTY) LTD (and its subsidiary)**  
**OLD MUTUAL LIFE ASSURANCE COMPANY (SOUTH AFRICA) LTD (and its subsidiaries)**  
**OLD MUTUAL EMERGING MARKETS LTD**  
**OLD MUTUAL DIVIDEND ACCESS COMPANY (PTY) LTD**  
**MASISIZANE FUND (NPC)**  
**OLD MUTUAL UNIT TRUST MANAGERS (RF) LTD**  
**OLD MUTUAL PORTFOLIO HOLDINGS (PTY) LTD**  
**OLD MUTUAL WEALTH (PTY) LTD (and its subsidiaries)**

**Access to the records of any subsidiary company of Old Mutual (South Africa) (Pty) Ltd not listed in this manual may be requested from the Information Officer, Old Mutual, at the address contained in this manual.**

**PROMOTION OF ACCESS TO INFORMATION ACT:**

CATEGORIES OF RECORDS AND SUBJECTS IN RESPECT OF WHICH RECORDS ARE HELD:

<b>Products and Services -</b>	
Long-term insurance products	Administration of Retirement Annuities and Pension Funds
Savings products	Trust services
Unit trust products	Money transfer services
Investment and risk products to groups and schemes	Actuarial and consulting services to the group retirement industry
Short-term Insurance products	Health Care products
Linked Investment services	Lending Products
Managed care services to the healthcare industry	Administration of medical schemes
<b>Company Records -</b>	
Finance and supporting documentation	Distribution
Actuarial	Marketing
Client care	Information Technology
Product management	Human Resources
All records kept in terms of the Company Laws of South Africa	
<b>Subjects on which records are held -</b>	
Shareholders	Subsidiary companies
Board members	Advisors
Directors	Independent brokers
Employees	Clients
Officials	Banking institutions
Consultants	External companies / contractors
Investors	Policyholders
<b>The following records are held in respect of the abovementioned data subjects</b>	
Confidential	Scientific
Personal	Research
Commercial	Operational
Financial	Trade
Group / company incorporation	Business
Group / company financial	Internal group / company divisions
Group / company departments	Group / company structure
Strategy	Policyholder

Contractor	Shareholder
Investor	External companies
Subsidiary companies	Broker
Adviser	Directors
Consultant	Employee
Information Technology	Banking institutions
Client	Official / legal
Product and services	Policy documents
Contracts	
Rules of Funds	
<b>Records are held in terms of the following legislation -</b>	
Long-term Insurance Act, 52 of 1998	Employment Equity Act, 55 of 1998
Pension Funds Act, 24 of 1956	Prevention of Organised Crime Act, 121 of 1998
Medical Schemes Act, 131 of 1998	Financial Intelligence Centre Act, 38 of 2001
Collective Investment Schemes Control Act, 45 of 2002	Security Services Act, 36 of 2004
Inspection of Financial Institutions Act, 80 of 1998	Income Tax Act, 58 of 1962
Labour Relations Act, 66 of 1995	Value-Added Tax Act, 58 of 1962
Tax on Retirement Funds Act, 38 of 1996	Short-term Insurance Act, 53 of 1998
Basic Conditions of Employment Act, 75 of 1997	Unemployment Insurance Act, 30 of 1966
Financial Services Board Act, 97 of 1990	Financial Advisory and Intermediary Services Act, 37 of 2002
Companies Act, 61 of 1973	National Credit Act, 34 of 2005

**PROTECTION OF PERSONAL INFORMATION ACT:**

<b><i>Purpose of the processing</i></b>	
Administer insurance business	Promote our services
Provide financial services and advice	Maintain our accounts and records
Support and manage our employees	Provide underwriting services
Investment management and advice	To hold and administer securities or other assets as a nominee holder
Use of CCTV systems for the prevention and detection of crime	Administer financial transactions
Property management	Assessment and processing of claims
Credit searches and/or verification	Claims checks (ASISA Life & Claims register)
Fraud prevention and detection	Market research and statistical analysis
Compliance with legal and regulatory requirements	Verifying your identity
<b><i>Categories of data subjects</i></b>	
Shareholders	Subsidiary companies
Board members	Advisors
Directors	Independent brokers
Employees	Clients
Officials	Banking institutions
Consultants	External companies / contractors
Offenders and suspected offenders	Suppliers and service providers
Investors	Policyholders
Complainants, enquirers	Professional advisers
Trustees	Pension Fund members and beneficiaries
Employers and employees of other organisations	Individuals captured by CCTV images
Witnesses	Individuals who have indicated interest in our products and/or services
<b><i>Type/classes of information processed</i></b>	
Personal details	Family details
Lifestyle and social circumstances	Education and employment details
Business activities of the person whose personal information we are processing	Visual images of individuals captured on CCTV footage
Goods or services provided	Financial details
Personal views, preferences or opinions of individuals	

<b>Types / classes of special personal information processed</b>	
Racial or ethnic origin	Religious or other beliefs
Trade union membership	Physical or mental health details
Offences and alleged offences	Criminal proceedings, outcomes and sentences
<b>Who the information may be shared with</b>	
<p>We sometimes need to share the personal information we process with the individual themselves and also with other organisations. Where this is necessary we are required to comply with all aspects of the Protection of Personal Information Act. What follows is a description of the types of organisations we may need to share some of the personal information we process with for one or more reasons.</p> <p>Where necessary or required we share information with:</p>	
Family, associates and representatives of the person whose personal information we are processing	Current, past and prospective employers
Employment and recruitment agencies	Educators and examining bodies
Financial organisations	Claims investigators
Credit reference agencies	Suppliers and service providers
Healthcare, social and welfare organisations	Credit reference agencies
Healthcare professionals	Industry bodies
Central government	Ombudsman and regulatory authorities
Police forces and courts, where necessary	Survey and research organizations
Operators	Debt collection and tracing agencies
Business associates and other professional advisers	Other companies in the Old Mutual Group
Professional advisors and consultants	Auditors
Claimants, beneficiaries, assignees and payees	Pension fund administrators
Press and the media	Trade unions
Persons making an enquiry or complaint	Security organizations
Private investigators	
<b>Transborder flows of personal information</b>	
<p>The companies listed in this manual may from time to time need to share personal information of data subjects with third parties in other countries. We are required to ensure that when we need to do this we comply with the</p>	

## Protection of Personal Information Act.

Such sharing will only be done if one of the following requirements are met:

(a) the third party who is the recipient of the information is subject to a law, binding corporate rules or binding agreement which provide an adequate level of protection that—

(i) effectively upholds principles for reasonable processing of the information that are substantially similar to the conditions for the lawful processing of personal information relating to a data subject who is a natural person and, where applicable, a juristic person, as set out in the Protection of Personal Information Act; and

(ii) includes provisions, that are substantially similar to this section, relating to the further transfer of personal information from the recipient to third parties who are in a foreign country;

(b) the data subject consents to the transfer;

(c) the transfer is necessary for the performance of a contract between the data subject and the company in question, or for the implementation of pre-contractual measures taken in response to the data subject's request;

(d) the transfer is necessary for the conclusion or performance of a contract concluded in the interest of the data subject between the company in question and a third party; or

(e) the transfer is for the benefit of the data subject, and—

(i) it is not reasonably practicable to obtain the consent of the data subject to that transfer; and

(ii) if it were reasonably practicable to obtain such consent, the data subject would be likely to give it.

### **PROCEDURE TO BE FOLLOWED TO REQUEST ACCESS TO THE RECORDS:**

□ Requestors are to complete the prescribed FORM C as contained in the Regulations to the Act.

□ The completed FORM C may be **posted or faxed** to the Information Officer Old Mutual at the address below or **posted or faxed** to any of the specific subsidiary company Information Officers listed below should the requestor know the specific subsidiary company.

□ The relevant Information Officer will process the request and inform the requestor of the fees, (if any) that he/she has to pay and of the further steps that will follow in the processing of the request.

*Note: Access to certain records may be denied on the grounds set out in the Promotion of Access to Information Act, No 2 of 2000.*

**THE INFORMATION OFFICER  
OLD MUTUAL (SOUTH AFRICA) (PTY) LTD  
OLD MUTUAL EMERGING MARKETS LTD  
PO BOX 66  
CAPE TOWN  
8000**

Tel. No. (+27 21) 504 9296

Fax No. (+27 21) 509 4646

**Subsidiary Company Information  
Officers**

THE INFORMATION OFFICER:  
**OLD MUTUAL LIFE ASSURANCE  
COMPANY (SOUTH AFRICA) LTD**

Tel. No. (+27 21) 504 9296

Fax No. (+27 21) 509 4646

THE INFORMATION OFFICER  
**OLD MUTUAL WEALTH (PTY) LTD**

Tel. No. (+27 21) 509 0645

Fax No. (+27 21) 509 5663

THE INFORMATION OFFICER:  
**AGILITY BROKER SERVICES (PTY) LTD**

Tel. No. (+27 21) 504 9296

Fax No. (+27 21) 509 4646

THE INFORMATION OFFICER:  
**OLD MUTUAL HEALTH INSURANCE LTD**

Tel. No. (+27 21) 504 9296

Fax No. (+27 21) 509 4646

THE INFORMATION OFFICER  
**MASISIZANE FUND (NPC)**

Tel. No. (+27 21) 504 9296

Fax No. (+27 21) 509 4646

THE INFORMATION OFFICER  
**AC SIS LTD**

Tel. No. (+27 21) 509 0645

Fax No. (+27 21) 509 5663

THE INFORMATION OFFICER  
**MASTHEAD (PTY) LTD**

Tel. No. (+27 21) 504 9296

Fax No. (+27 21) 509 4646

THE INFORMATION OFFICER  
**BLACK BROKER HOLDINGS (PTY) LTD**

Tel. No. (+27 21) 504 9296

Fax No. (+27 21) 509 4646

THE INFORMATION OFFICER  
**OLD MUTUAL CAPITAL HOLDING  
(PTY) LTD**

Tel. No. (+27 21) 504 9296

Fax No. (+27 21) 509 4646

THE INFORMATION OFFICER  
**OLD MUTUAL ALTERNATIVE  
SOLUTIONS LTD**

Tel. No. (+27 11) 317 4088

Fax. No. (+27 86)668 05738

THE INFORMATION OFFICER  
**OLD MUTUAL DIVIDEND ACCESS  
COMPANY (PTY) LTD**

Tel. No. (+27 21) 504 9296  
Fax No. (+27 21) 509 4646

THE INFORMATION OFFICER  
**OLD MUTUAL PORTFOLIO HOLDINGS  
(PTY) LTD**

Tel. No. (+27 21) 504 9296  
Fax No. (+27 21) 509 4646

THE INFORMATION OFFICER:  
**OLD MUTUAL UNIT TRUST MANAGERS  
(RF) LTD**

Tel. No. (+27 21) 509 0645  
Fax No. (+27 21) 509 5663

THE INFORMATION OFFICER:  
**OLD MUTUAL INVESTMENT GROUP  
(PTY) LTD**

Tel. No. (+27 21) 509 0445  
Fax No. (+27 21) 509 2744

THE INFORMATION OFFICER:  
**OLD MUTUAL FINANCE (RF) (PTY) LTD**

Tel. No. (+27 21) 533 0258  
Fax No. (+27 21) 503 4297

THE INFORMATION OFFICER:  
**OLD MUTUAL PROPERTY (PTY) LTD**

Tel. No. (+27 21) 509 0445  
Fax No. (+27 21) 509 2744

THE INFORMATION OFFICER:  
**CELESTIS BROKER SERVICES (PTY) LTD**

Tel. No. (+27 21) 504 9296  
Fax No. (+27 21) 509 4646

THE INFORMATION OFFICER:  
**OLD MUTUAL INVESTMENT SERVICES  
(PTY) LTD**

Tel. No. (+27 21) 509 0645  
Fax No. (+27 21) 509 5663

**THE SOUTH AFRICAN HUMAN RIGHTS COMMISSION GUIDE (SEC 10 OF THE ACT):**

The Human Rights Commission will compile a guide containing such information as may reasonably be required by any person who wishes to exercise any right contemplated in the Act. The South African Human Rights Commission can be contacted at the following address:

Private Bag 2700, HOUGHTON, 2041.  
Tel. : (+27 11) 484 8300  
Fax : (+27 11) 484 0582  
Website : [www.sahrc.org.za](http://www.sahrc.org.za)