

BETTER COMPARE

PAIA MANUAL

**Prepared in terms of section 51 of the
Promotion of Access to Information Act
2 of 2000 (as amended)**

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1. LIST OF ACRONYMS AND ABBREVIATIONS

- | | | |
|-----|--------------------|--|
| 1.1 | “MD” | Managing Director |
| 1.2 | “DIO” | Deputy Information Officer; |
| 1.3 | “FIRM” | Better Compare |
| 1.4 | “IO“ | Information Officer; |
| 1.5 | “Minister” | Minister of Justice and Correctional Services; |
| 1.6 | “PAIA” | Promotion of Access to Information Act No. 2 of 2000(as Amended); |
| 1.7 | “POPIA” | Protection of Personal Information Act No.4 of 2013; |
| 1.8 | “Regulator” | Information Regulator; and |
| 1.9 | “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 the firm, that is available without a person having to submit a formal PAIA request;
- 2.2 have a sufficient understanding of how to request access to a record of the firm, by describing the subjects on which the firm holds records and the categories of records held on each subject;
- 2.3 know the description of the records of the firm which are available under any other legislation;

- 2.4 access all the relevant contact details of the Information Officer and Deputy Information Officer 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 firm will process personal information, the purpose of the processing of personal information and the description of the categories of data subjects and the information or categories of information relating thereto;
- 2.7 know the description of the categories of data subjects and 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 firm 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 firm 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 HELD BY BETTER COMPARE

3.1. Managing Director

Name: Michael David Williams
Tel: 031 267 7700
Email: mike@mdwilliamsattorney.co.za

3.2. Information Officer

Name: Kalay Munsami
Tel: 031 538 1745
Email: trish@better-compare.co.za

3.3 Access to information general contacts

Email: compliance@better-compare.co.za

3.4 National or Head Office

Postal Address:

24 Flanders Drive, Mount Edgecombe, Durban, KwaZulu
Natal, South Africa, 4300

Physical Address: 24 Flanders Drive, Mount Edgecombe, Durban, KwaZulu
Natal, South Africa, 4300

Telephone: 031 538 1716

Email: compliance@better-compare.co.za

Website: <https://www.bettercompare.co.za/>

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 PAIA¹ and section 56 of POPIA²;
- 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 11³; and
 - 4.3.3.2. access to a record of a private body contemplated in section 50⁴;
- 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-

¹ Section 17(1) of PAIA- *For the purposes of PAIA, each public body must, subject to legislation governing the employment of personnel of the public body concerned, designate such number of persons as deputy information officers as are necessary to render the public body as accessible as reasonably possible for requesters of its records.*

² Section 56(a) of POPIA- *Each public and private body must make provision, in the manner prescribed in section 17 of the Promotion of Access to Information Act, with the necessary changes, for the designation of such a number of persons, if any, as deputy information officers as is necessary to perform the duties and responsibilities as set out in section 55(1) of POPIA.*

³ Section 11(1) of PAIA- *A requester must be given access to a record of a public body if that requester complies with all the procedural requirements in PAIA relating to a request for access to that record; and access to that record is not refused in terms of any ground for refusal contemplated in Chapter 4 of this Part.*

⁴ Section 50(1) of PAIA- *A requester must be given access to any record of a private body if-*

- a) *that record is required for the exercise or protection of any rights;*
- b) *that person complies with the procedural requirements in PAIA relating to a request for access to that record; and*
- c) *access to that record is not refused in terms of any ground for refusal contemplated in Chapter 4 of this Part.*

- 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. All relevant forms in terms of the above remedies an individual decides to use are attached on our website these are:
- 4.3.7.1. Request For Access to Record
 - 4.3.7.2. Internal Appeal Form
- 4.3.8. the provisions of sections 14⁵ and 51⁶ requiring a public body and private body, respectively, to compile a manual, and how to obtain access to a manual;
- 4.3.9. the provisions of sections 15⁷ and 52⁸ providing for the voluntary disclosure of categories of records by a public body and private body, respectively;
- 4.3.10. the notices issued in terms of sections 22⁹ and 54¹⁰ regarding fees to be paid in relation to requests for access; and

⁵ Section 14(1) of PAIA- The information officer of a public body must, in at least three official languages, make available a manual containing information listed in paragraph 4 above.

⁶ Section 51(1) of PAIA- The head of a private body must make available a manual containing the description of the information listed in paragraph 4 above.

⁷ Section 15(1) of PAIA- The information officer of a public body, must make available in the prescribed manner a description of the categories of records of the public body that are automatically available without a person having to request access

⁸ Section 52(1) of PAIA- The head of a private body may, on a voluntary basis, make available in the prescribed manner a description of the categories of records of the private body that are automatically available without a person having to request access

⁹ Section 22(1) of PAIA- The information officer of a public body to whom a request for access is made, must by notice require the requester to pay the prescribed request fee (if any), before further processing the request.

¹⁰ Section 54(1) of PAIA- The head of a private body to whom a request for access is made must by notice require the requester to pay the prescribed request fee (if any), before further processing the request.

4.3.11. the regulations made in terms of section 92¹¹.

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 Information Officer;

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 English and isiZulu

5. CATEGORIES OF RECORDS OF BETTER COMPARE WHICH ARE AVAILABLE WITHOUT A PERSON HAVING TO REQUEST ACCESS

Category of records	Types of the Record	Available on Website
Statutory Disclosures	Legal	X
Complaints Procedure	Legal	X
Company Contact Details	General	X
Privacy Policy	Legislative	X
Complaints Procedure	Legislative	X

¹¹ Section 92(1) of PAIA provides that –“The Minister may, by notice in the Gazette, make regulations regarding-

(a) any matter which is required or permitted by this Act to be prescribed;

(b) any matter relating to the fees contemplated in sections 22 and 54;

(c) any notice required by this Act;

(d) uniform criteria to be applied by the information officer of a public body when deciding which categories of records are to be made available in terms of section 15; and

(e) any administrative or procedural matter necessary to give effect to the provisions of this Act.”

6. DESCRIPTION OF THE RECORDS OF BETTER COMPARE WHICH ARE AVAILABLE IN ACCORDANCE WITH ANY OTHER LEGISLATION

Category of Records	Applicable Legislation
Company Registration Certificate	Companies Act 71 of 2008
PAIA Manual	Promotion of Access to Information Act 2 of 2000
FSCA License Certificate	FAIS Act
Privacy Policy	Protection of Personal Information Act

7. DESCRIPTION OF THE SUBJECTS ON WHICH THE BODY HOLDS RECORDS AND CATEGORIES OF RECORDS HELD ON EACH SUBJECT BY THE BETTER COMPARE

Subjects on which the body holds records	Categories of records
Strategic Documents, Plans, Proposals	Annual Reports, Business Plan, Annual Performance Plan.
Human Resources	<ul style="list-style-type: none"> - HR policies and procedures - Employees records - Workmans Compensation - Unemployment Insurance Fund - Skills Development - Health & Safety Policy - COVID Policy
Finance	<ul style="list-style-type: none"> - Audited Financial Statements - SARS Letter of Good standing

Subjects on which the body holds records	Categories of records
	- Professional Indemnity Insurance

8. PROCESSING OF PERSONAL INFORMATION

8.1 Purpose of Processing Personal Information

8.1.1 Better Compare offers the services of a comparison site to consumers in South Africa. Consumers can compare prices of financial products within the marketplace to assist them in making an informed decision on financial products that are suitable for them. As a result of the service, the firm offers to the public, certain categories of personal information must be collected and processed to return accurate comparisons to the consumer.

8.1.2 Better Compare conducts its business with various suppliers. Supplier information is collected and processed as part of the firms onboarding process and payment of services provided or gained.

8.1.3 The firm also collects and processes information of its employee, this is necessary, to ensure fit and proper requirements are followed in line with Basic Conditions of Employment, employees salaries are paid, and all relevant labour laws are adhered to as an employer.

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

Categories of Data Subjects	Personal Information that may be processed
Customers / Clients	name, address, Identity numbers, employment status and bank details
Service Providers	names, registration number, vat numbers, address, trade secrets and bank details
Employees	address, qualifications, gender and race

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
Employee Identity number and names and qualifications	VIP Payroll, Unemployment Insurance Fund, SARS, Financial Services Conduct Authority, Masthead Compliance
Consumer Identity Number, Name and Surname, Employment details, Bank Details, Address Details, existing insurance details, financial standing details	Vehicle Insurers, Life Insurers, Credit Providers, Medical Aid providers,
Supplier Information	Masthead, FIC where applicable

8.4 Planned transborder flows of personal information

No personal information is stored outside the Republic of South Africa

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

- 8.5.1 Source code is stored and protected to ensure that data therein is managed as per the Organisation's requirements.
- 8.5.2 Stringent session management controls are deployed to ensure that a user's session is not compromised.
- 8.5.3 Error messages are configured not to contain sensitive information, including system details, account information or cryptographic information.

- 8.5.4 Information used in application service transactions is protected to prevent incomplete transmission, miss-routing, unauthorised message alteration, unauthorised disclosure and unauthorised message duplication or replay.
- 8.5.5 Applications are deployed using a standard build configuration
- 8.5.6 A file management system to govern the security of files such as data files, configuration and log files have been implemented

9. AVAILABILITY OF THE MANUAL

9.1 A copy of the Manual is available-

9.1.1 On <https://www.bettercompare.co.za/>;

9.1.2 At our head office Better Compare, 24 Flanders Drive, Mount Edgecombe, Durban, KwaZulu Natal, South Africa, 4300, 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 paid per each A4-size photocopy made.

10. UPDATING OF THE MANUAL

The head of Compliance will regularly update this manual.

Issued by

Trish Munsami
Information Officer