

PAIA MANUAL

Prepared in accordance with section 51 of the Promotion of Access to Information Act, No.2 of 2000 (as amended) and updated in the light of the Protection of Personal Information Act 4 of 2013 ("POPIA")

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1. Purpose of the PAIA Manual

This PAIA Manual is useful for the public to -

- 1.1 check the categories of records held by a body which are available without a person having to submit a formal PAIA request;
- 1.2 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;
- 1.3 know the description of the records of the body which are available in accordance with any other legislation;
- 1.4 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;
- 1.5 know the description of the guide on how to use PAIA, as updated by the Regulator and how to obtain access to it;
- 1.6 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;
- 1.7 know the description of the categories of data subjects and of the information or categories of information relating thereto;
- 1.8 know the recipients or categories of recipients to whom the personal information may be supplied;
- 1.9 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
- 1.10 know whether the body has appropriate security measures to ensure the confidentiality, integrity and availability of the personal information which is to be processed.

2. Key Contact Details

Information Officer

Name: Bafedile Mafologele

Email: bafedile@sampada.co.za

Deputy Information Officer

Name: Erick Mabela

Email: compliance@moruolife.co.za

Deputy Information Officer

Name: Roomanah Hassen-Bootha

Email: roomanah@moruolife.co.za

Access to information general contact

Email: info@moruolife.co.za

Head Office

Suite 15, 2nd Floor Katherine & West
114 West Street
Sandton
Johannesburg
2196

3. Guide on How to Use PAIA

The Information Regulator has published a guide on how to use PAIA.

The guide contains information on:

- How to request access to records
- The rights of requesters
- The procedures to follow where access is denied

The guide is available:

- From the Information Regulator
- On the Regulator's website: <https://www.justice.gov.za/inforeg/>
- Upon request from the Information Officer

4. Categories of Records Available Without Request

The following records are available without the need to submit a formal PAIA request:

- Company profile and product information
- Marketing and informational material
- This PAIA Manual

5. Records Available in Terms of Other Legislation

Moruo Life holds records in accordance with, among others:

- Companies Act 71 of 2008
- Insurance Act 18 of 2017
- Pension Funds Act 24 of 1956
- Financial Advisory and Intermediary Services Act 37 of 2002
- Financial Intelligence Centre Act 38 of 2001
- Labour Relations Act 66 of 1995
- Basic Conditions of Employment Act 75 of 1997

- Income Tax Act 58 of 1962

These records include:

- Corporate governance and statutory records
- Policyholder and member records
- Financial and accounting records
- Compliance and regulatory records

6. Categories of Records held by Moruo Life

Moruo Life conducts life insurance business focused on group risk and funeral benefits.

6.1. Insurance and Client Records

- Policyholder (pension fund) agreements
- Member and beneficiary records
- Contribution and premium records
- Benefit structures and policy terms
- Claims records (death, disability, funeral)

6.2. Operational Records

- Claims processing and assessment records
- Underwriting and pricing documentation
- Actuarial and risk management records
- Administrator and service provider agreements

6.3. Financial Records

- Accounting records
- Payment and claims disbursement records
- Financial statements

6.4. Governance and Compliance

- Board and committee records
- Compliance and regulatory filings
- Risk management documentation

6.5. Human Resources

- Employee records
- Payroll and employment records

7. Processing of Personal information

7.1. Purpose of Processing

Moruo Life processes personal information for the following purposes:

- Provision of insurance products and services
- Underwriting and pricing
- Claims assessment and payment
- Compliance with legal and regulatory requirements
- Fraud prevention and risk management
- Record keeping and administration

7.2. Categories of Data Subjects

Moruo Life processes information relating to:

- Policyholders (pension funds)
- Members (insured individuals)
- Beneficiaries
- Employees
- Service providers and administrators

7.3. Categories of Personal Information

The personal information processed may include, but is not limited to:

- Identification information (name, ID number, date of birth)
- Contact details (residential address, email address, telephone number)
- Financial information (salary, contributions, tax ID number)
- Benefit and policy information (premium payment history, claims records)
- Claims-related information, including medical history and death-related information
- Beneficiary and next-of-kin details
- Bank account details

8. Recipients of Personal Information

Personal information may be shared with:

- Pension fund administrators (Section 13B administrators)
- Policyholders (pension funds)

- Service providers supporting operations
- Regulatory authorities
- Auditors and professional advisors
- Beneficiaries and authorised representatives
- Reinsurers

Moruo Life ensures that all sharing of personal information is conducted in accordance with POPIA.

9. Transborder Flows of Personal Information

Moruo Life does not plan to transfer your personal information beyond the borders of the Republic of South Africa. However, in the unlikely event of Moruo Life having to transfer personal information outside the borders of the Republic of South Africa, Moruo Life will ensure that such transfers comply with the requirements of Section 72 of POPIA. Specifically, Moruo Life will only transfer personal information to a foreign country where:

- The foreign country affords an adequate level of protection that is substantially similar to the conditions prescribed in POPIA;
- The data subject has given express consent to the transfer;
- The transfer is necessary for the conclusion or performance of a contract in the interest of the data subject;
- The transfer is for the benefit of the data subject and it is not reasonably practicable to obtain consent, and the data subject would, in all likelihood, provide such consent if asked;
- It had entered into a binding agreement with the recipient that imposes obligations equivalent to those under POPIA (including provisions for onward transfer).

10. Information Security Measures

Moruo Life implements appropriate technical and organisational measures to ensure:

- Confidentiality of personal information
- Integrity and accuracy of data
- Availability of information when required

Access to personal information is restricted based on role and responsibility.

11. How to Request Access to Records

Requests for access to records must be made using the prescribed PAIA request form (see annexures to this policy).

Requests must include:

- Sufficient detail to identify the record
- Proof of identity
- Proof of authority (if acting on behalf of another person)

Requests may be submitted via email to the Information Officer at compliance@moruolife.co.za. Fees may be applicable in accordance with PAIA regulations.

Access may be refused on grounds permitted under PAIA.

12. Availability of the Manual

This manual is available:

- On the Moruo Life website (www.moruolife.co.za)
- At the registered office for inspection:
- Upon request from the Information Officer at compliance@moruolife.co.za

13. Updates to the Manual

This manual will be reviewed and updated at least annually or as and when necessary, to ensure alignment with relevant legislative and operational changes.

14. Document Control

Version	Effective date	Changes	Revision date
V1	11 May 2026	Policy established	10 May 2027

FORM 2

REQUEST FOR ACCESS TO RECORD

[Regulation 7]

NOTE:

1. Proof of identity must be attached by the requester.
2. If requests made on behalf of another person, proof of such authorisation, must be attached to this form.

TO: The Information Officer Moruo Life Limited
Suite 15, 2nd Floor, Katherine and West Building,
114 West Street,
Sandton
2196

E-mail address: info@moruolife.co.za

Mark with an "X"

☐

Request is made in my own name

☐

Request is made on behalf of another person.

PERSONAL INFORMATION			
Full Names			
Identity Number			
Capacity in which request is made <i>(when made on behalf of another person)</i>			
Postal Address			
Street Address			
E-mail Address			
Contact Numbers	Tel. (B):		Facsimile:
	Cellular:		
Full names of person on whose behalf request is made <i>(if applicable)</i> :			
Identity Number			
Postal Address			
Street Address			

E-mail Address			
Contact Numbers	Tel. (B)		Facsimile
	Cellular		
PARTICULARS OF RECORD REQUESTED <i>Provide full particulars of the record to which access is requested, including the reference number if that is known to you, to enable the record to be located. (If the provided space is inadequate, please continue on a separate page and attach it to this form. All additional pages must be signed.)</i>			
Description of record or relevant part of the record:			
Reference number, if available			
Any further particulars of record			
TYPE OF RECORD (Mark the applicable box with an "X")			
Record is in written or printed form			
Record comprises virtual images (<i>this includes photographs, slides, video recordings, computer-generated images, sketches, etc</i>)			
Record consists of recorded words or information which can be reproduced in sound			
Record is held on a computer or in an electronic, or machine-readable form			

FORM OF ACCESS <i>(Mark the applicable box with an "X")</i>	
Printed copy of record <i>(including copies of any virtual images, transcriptions and information held on computer or in an electronic or machine-readable form)</i>	
Written or printed transcription of virtual images <i>(this includes photographs, slides, video recordings, computer-generated images, sketches, etc)</i>	
Transcription of soundtrack <i>(written or printed document)</i>	
Copy of record on flash drive <i>(including virtual images and soundtracks)</i>	
Copy of record on compact disc drive <i>(including virtual images and soundtracks)</i>	
Copy of record saved on cloud storage server	

MANNER OF ACCESS <i>(Mark the applicable box with an "X")</i>	
Personal inspection of record at registered address of public/private body <i>(including listening to recorded words, information which can be reproduced in sound, or information held on computer or in an electronic or machine-readable form)</i>	
Postal services to postal address	
Postal services to street address	
Courier service to street address	
Facsimile of information in written or printed format <i>(including transcriptions)</i>	
E-mail of information <i>(including soundtracks if possible)</i>	
Cloud share/file transfer	
Preferred language <i>(Note that if the record is not available in the language you prefer, access may be granted in the language in which the record is available)</i>	

PARTICULARS OF RIGHT TO BE EXERCISED OR PROTECTED <i>If the provided space is inadequate, please continue on a separate page and attach it to this Form. The requester must sign all the additional pages.</i>	
Indicate which right is to be exercised or protected	

Explain why the record requested is required for the exercise or protection of the aforementioned right:	

FEES	
a)	<i>A request fee must be paid before the request will be considered.</i>
b)	<i>You will be notified of the amount of the access fee to be paid.</i>
c)	<i>The fee payable for access to a record depends on the form in which access is required and the reasonable time required to search for and prepare a record.</i>
d)	<i>If you qualify for exemption of the payment of any fee, please state the reason for exemption</i>
Reason	

You will be notified in writing whether your request has been approved or denied and if approved the costs relating to your request, if any. Please indicate your preferred manner of correspondence:

Postal address	Facsimile	Electronic communication (Please specify)

Signed at _____ this _____ day of _____ 20 _____

Signature of Requester / person on whose behalf request is made

FOR OFFICIAL USE

Reference number:	
Request received by: (State Rank, Name And Surname of Information Officer)	
Date received:	
Access fees:	
Deposit (if any):	

Signature of Information Officer

Annexure B

Note:

FORM 3
OUTCOME OF REQUEST AND OF FEES PAYABLE
[Regulation 8]

1. If your request is granted the—
 - (a) amount of the deposit, (if any), is payable before your request is processed; and
 - (b) requested record/portion of the record will only be released once proof of full payment is received.
2. Please use the reference number hereunder in all future correspondence.

Reference number: _____

TO:

Your request dated _____, refers.

1. You requested:

Personal inspection of information at registered address of public/private body (<i>including listening to recorded words, information which can be reproduced in sound, or information held on computer or in an electronic or machine-readable form</i>) is free of charge. You are required to make an appointment for the inspection of the information and to bring this Form with you. If you then require any form of reproduction of the information, you will be liable for the fees prescribed in Annexure B.	
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OR

2. You requested:

Printed copies of the information (<i>including copies of any virtual images, transcriptions and information held on computer or in an electronic or machine-readable form</i>)	
Written or printed transcription of virtual images (<i>this includes photographs, slides, video recordings, computer-generated images, sketches, etc</i>)	
Transcription of soundtrack (<i>written or printed document</i>)	
Copy of information on flash drive (<i>including virtual images and soundtracks</i>)	
Copy of information on compact disc drive (<i>including virtual images and soundtracks</i>)	
Copy of record saved on cloud storage server	

3. To be submitted:

Postal services to postal address	
Postal services to street address	
Courier service to street address	
Facsimile of information in written or printed format (<i>including transcriptions</i>)	
E-mail of information (<i>including soundtracks if possible</i>)	
Cloud share/file transfer	
Preferred language: (<i>Note that if the record is not available in the language you prefer, access may be granted in the language in which the record is available</i>)	

Kindly note that your request has been:

☐

Approved

☐

Denied, for the following reasons:

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4. Fees payable with regards to your request:

Item	Cost per A4-size page or part thereof/item	Number of pages/items	Total
Photocopy			
Printed copy			
For a copy in a computer-readable form on:			
(i) Flash drive			
• To be provided by requestor	R40.00		
(ii) Compact disc			
• If provided by requestor	R40.00		
• If provided to the requestor	R60.00		
For a transcription of visual images per A4-size page	Service to be outsourced. Will depend on the quotation of the service provider		
Copy of visual images			
Transcription of an audio record, per A4-size	R24.00		
Copy of an audio record			
(i) Flash drive			
• To be provided by requestor	R40.00		
(ii) Compact disc			
• If provided by requestor	R40.00		
• If provided to the requestor	R60.00		
Postage, e-mail or any other electronic transfer:	Actual costs		
TOTAL:			

5. Deposit payable (if search exceeds six hours):

☐ Yes
 ☐ No

Hours of search	Amount of deposit (calculated on one third of total amount per request)

The amount must be paid into the following Bank account:

Name of Bank: _____
 Name of account holder: _____
 Type of account: _____
 Account number: _____
 Branch Code: _____
 Reference Nr: _____
 Submit proof of payment to: _____

Signed at _____ this _____ day of _____ 20 _____

Information officer