PROMOTION OF ACCESS TO INFORMATION MANUAL
MURPHY'S (PTY) LTD

(Prepared in accordance with Section 51 of the Promotion of Access to Information Act, 2 of 2000, as amended)

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2 Introduction

This Manual is prepared by Murphy's (Pty) Ltd, trading as Murphy's Insurance Brokers ("Murphy's"), under the Promotion of Access to Information Act, 2 of 2000 ("PAIA") and the Protection of Personal Information Act, 4 of 2013 ("POPIA"). It explains the records Murphy's holds, how to request access, and how personal information is handled. Access is subject to PAIA and other applicable law.

PAIA gives effect to the constitutional right of access to information. POPIA governs the lawful processing of personal information. This Manual describes:

- The types and categories of records held by Murphy's
- The personal information processed in the course of insurance brokerage services
- How to submit a request for access to a record
- The grounds on which access may be refused
- The applicable request and access fees

3 Company Details

The table below identifies Murphy's and its Information Officer. Items marked in square brackets require confirmation before publication.

Registered Name	Murphy's (Pty) Ltd
Trading Name	Murphy's Insurance Brokers
Legal Form	Private company (Pty) Ltd)
Registration Number	2024/450647/07
FSP Number	54915
VAT Number	4960325761
Physical Address	107 Turkoois Street, Lyttelton Manor, Pretoria, 0157
Postal Address	107 Turkoois Street, Lyttelton Manor, Pretoria, 0157
Head of Business	Llan Kellett
Information Officer	Llan Kellett
Designation	Information Officer

Telephone Number	082 303 2544
Email Address (PAIA Contact)	llan@murphysinsurance.co.za
Website	https://murphysinsurance.co.za/
Business Hours	08:00 to 17:00 Monday to Fridays

4 Description of Business Operations

Murphy's (Pty) Ltd is a private company and an authorised financial services provider (FSP 54915), regulated by the Financial Sector Conduct Authority under the Financial Advisory and Intermediary Services Act, 2002 ("FAIS Act").

Murphy's provides insurance advice and intermediary services within its authorisation, including:

- Long-term insurance: subcategories B1 and B2
- Short-term insurance: personal lines
- Short-term insurance: commercial lines, including business and agricultural risks
- Advice (non-automated) and intermediary services (other), within the scope of its FSP licence
- Client enquiries, needs analysis, onboarding, policy administration support, claims assistance, compliance checks and related recordkeeping

Services are provided in South Africa directly and, where applicable, through authorised representatives. The exact scope of services is governed by the current FSP licence and its conditions.

5 Guide on how to use PAIA and how to obtain access to the guide

The Information Regulator publishes a Guide explaining how to exercise rights under PAIA and how to request access to information, including personal information under POPIA. The Guide is available from the Regulator's website and offices.

The Guide:

- Explains the purpose and operation of PAIA and POPIA
- Describes how to submit a request for access to records

- Explains the remedies available when access is refused or a request is not decided
- Provides details for contacting the Information Regulator
- Includes applicable procedures, timeframes and prescribed forms

The Guide is available in South Africa's official languages and in accessible formats as published by the Regulator.

A copy of the Guide may be obtained:

- From the Information Regulator: https://inforegulator.org.za/paia-guidelines/
- By contacting the Information Regulator:
    - Email: enquiries@inforegulator.org.za (general enquiries)
    - PAIAComplaints@inforegulator.org.za (PAIA complaints)
    - Telephone: 010 023 5200
    - Physical address: Woodmead North Office Park, 54 Maxwell Drive, Woodmead, Johannesburg. Postal address: P.O. Box 31533, Braamfontein, Johannesburg, 2017.
- Or by requesting assistance from Murphy's Information Officer using the contact details in the Company Details table.

6 Records Automatically Available (Section 52(2))

The records below may be requested informally from Murphy's, subject to availability, third-party rights and any applicable legal restrictions. Their listing does not guarantee that a record exists or can be disclosed without a PAIA assessment.

Type of Record	Available Via
Company brochures and service information	On Murphy's website or on request, subject to availability
FSP licence / authorised product categories	Available on request from the Information Officer
Privacy statement/notice	On the website or on request from the Information Officer
Conflict of interest and complaints policies	On request from the Information Officer
PAIA Manual	On the website once published, or on request from the Information Officer

7 Records held by the Company

5.1. Corporate Records

- Company registration and constitutional records
- Director and prescribed company registers
- FSP licence and authorisation records
- CIPC registration records
- Governance and management records, where held

5.2. Client Records

- Client identification and FICA due diligence records
- Insurance application, proposal, mandate and policy administration records
- Advice, needs analysis, disclosure and suitability records
- Client correspondence, service requests and complaints
- Claims assistance, instructions and related transaction records

5.3. Financial Records

- Annual financial statements and accounting records
- Tax, payroll and statutory filing records
- Invoices, receipts and payment records
- Budgets and management accounts, where held

5.4. HR & Employee Records

- Employment contracts and personnel files
- Payroll, tax and UIF records
- Leave, performance and disciplinary records
- Recruitment and job applicant records

5.5. Operational Policies

- Privacy, data protection and records management documents
- Risk management and compliance programme records

- Complaints, conflicts of interest and internal control records
- Information technology, security and business continuity documents

8 Purpose of processing Personal Information (POPIA Compliance)

Murphy's processes personal information for purposes connected with its insurance brokerage business, including:

- Complying with legal and regulatory duties, including FAIS, FICA and tax laws where applicable
- Responding to enquiries, assessing insurance needs, obtaining quotations and arranging or servicing policies
- Recruiting, employing and administering staff and prospective employees
- Performing agreements and providing client support, including claims assistance
- Maintaining records, managing complaints, preventing fraud and meeting regulatory reporting duties
- Communicating relevant services or updates where permitted by law and, where required, with consent

6.1. Categories of Data Subjects

- Individual and business clients, prospective clients, policyholders, insured persons, beneficiaries and claimants
- Representatives, directors, trustees, owners and authorised signatories
- Employees, prospective employees and contractors
- Insurers, service providers, suppliers, professional advisers and regulatory bodies

Examples include names, contact and identity details, policy and claims information, financial and payment details, correspondence, and, where relevant, health information or information about dependants. The specific data collected depends on the insurance service requested.

Individual data subjects	Juristic-person data subjects
Name, identity and contact details	Legal name, registration and business contact details

Individual data subjects	Juristic-person data subjects
Policy, risk, claims and payment details	Directors, owners, representatives and authorised signatories
Employment, financial and FICA due diligence details where relevant	Business, tax, financial and insurance information where relevant
Health or dependant information where required for cover or claims	Mandates and proof of authority

6.3. Special Information (if applicable)

- Health or medical information only where relevant to an insurance product, underwriting or a claim
- Criminal, fraud, sanctions or FICA-related information where lawfully required for due diligence
- Information about children or dependants where relevant to a policy or claim and handled under applicable safeguards

6.4. Trans-Border Information Flows

Personal information may be hosted or accessed outside South Africa if Murphy's uses a service provider or insurer that processes information across borders. Any transfer must meet POPIA's requirements, for example where:

- The recipient is subject to a law, binding agreement or binding corporate rules providing adequate protection
- The data subject consents, or the transfer is necessary to perform an agreement with the data subject
- Sharing is contractually necessary

9 Information Security Measures

Murphy's must take reasonable technical and organisational measures to protect personal information against loss, damage, unauthorised destruction and unlawful access. Specific controls must be confirmed by the Company before this Manual is approved. The

categories below describe safeguards to be documented, not a certification that each control is currently in place:

- Access controls and role-based permissions
- Authentication, password and account-management controls
- Endpoint protection, malware prevention and patching
- Physical and electronic storage protections, including backups
- Staff privacy and information-security awareness
- Confidentiality and data-processing terms with operators and service providers
- Retention, secure deletion and destruction practices

10 Procedure to request access to records

A requester seeking access to a record held by Murphy's should:

1. Complete prescribed Form 2 (Request for Access to Record), available from the Information Regulator's PAIA forms page at https://inforegulator.org.za/paia-forms/
2. Describe the record requested with enough detail to identify it and explain the right to be exercised or protected
3. Provide contact details and proof of identity; where acting for another person, include written authority and proof of that person's identity, where appropriate
4. Pay the prescribed request fee where it applies. No request fee is payable for a request for the requester's own personal information.

Send the request to the Information Officer:

Email: llan@murphysinsurance.co.za

Or deliver it to:

Physical and Postal address: 107 Turkoois Street, Lyttelton Manor, Pretoria, 0157. Postal address

The Information Officer will decide on a request within 30 days, subject to a lawful extension of up to a further 30 days. The requester will receive written notice of a decision, any extension, applicable fees and the reasons for a refusal.

Access will be granted where:

- The request meets PAIA's procedural requirements

- For a private body, the record is required for the exercise or protection of a right
- No ground for refusal applies; where appropriate, reasonably severable information may still be disclosed

11 Refusal of access

Murphy's may refuse access where a ground in PAIA applies, including where the record:

- Contains personal information about another person or confidential third-party information, subject to PAIA's provisions
- Contains trade secrets or commercial, financial, scientific or technical information that meets the statutory refusal test
- Is protected by legal professional privilege
- Is subject to a statutory prohibition or another applicable PAIA refusal ground
- Would create a risk to a person's safety or security, or relates to certain research, operations or law-enforcement matters protected by PAIA

If access is refused in whole or in part:

- The requester will be given written notice with reasons, subject to lawful limits on disclosure
- The notice will explain available remedies, including a complaint to the Information Regulator and an application to court, subject to applicable procedures and time limits

12 Prescribed Fees

Fee Type	Amount (ZAR)
Request fee (where applicable; not for own personal information)	R140.00
A4 photocopy / printed copy	R2.00 per page or part
Computer-readable copy: flash drive supplied by requester	R40.00
CD supplied by requester / supplied by Murphy's	R40.00 / R60.00

Fee Type	Amount (ZAR)
Search and preparation (after first hour; subject to prescribed cap)	R100.00 per hour or part, maximum R300.00
Deposit where search exceeds six hours/postage or electronic transfer	One-third of applicable access fee / actual expense, if any

The request fee is not payable when a requester seeks their own personal information. An access fee may still be payable for copies or search and preparation as allowed by PAIA and its regulations. The Information Officer will give the requester an estimate or notice before fees are incurred.

13 Remedies available to requesters

A requester who is dissatisfied with a decision, a partial refusal, a fee, or a failure to decide may:

- Submit a PAIA complaint (Form 5) to the Information Regulator. The prescribed forms are available at https://inforegulator.org.za/paia-forms/ and the complaint process is at https://inforegulator.org.za/complaints/
- Email: PAIAComplaints@inforegulator.org.za
- Website: https://inforegulator.org.za/
- Or apply to a competent court for relief in accordance with PAIA and applicable time limits. A requester of a private body does not have an internal appeal under PAIA.
- The Information Regulator may investigate a complaint and take steps provided for under PAIA and POPIA.

14 Review And Manual Availability

This Manual:

- Will be reviewed at least annually and when relevant legal, operational or contact details change
- Will be made available in electronic form on Murphy's website and in hard copy at its offices. Once approved and published, a copy may be requested from the Information Officer

- May be provided in other official languages or accessible formats on request, subject to reasonable arrangements

Approval Date	25/09/2026
Next Review Date	01/09/2027
Approved by	Llan Kellett in the capacity of Director and Information Officer
Version	1.0 Approved

15 Annexure A: Legislative Framework Reference Table

This annexure summarises key provisions of PAIA and POPIA relevant to Murphy's as a private body and responsible party. The summary is for navigation; the Acts and regulations prevail.

No.	Section of the Act	Legislative Summary	Applies To
1	Section 32 of the Constitution	Recognises the right of access to information held by the State and information held by another person when required to exercise or protect a right.	Everyone
2	Sections 11 and 50 of PAIA	Set the conditions for access to records of public and private bodies respectively. For a private body, the record must be required to exercise or protect a right, procedural requirements must be met and no refusal ground may apply.	Public / Private Bodies
3	Section 51 of PAIA	Requires a private body to compile and make available a manual describing its structure, contact details, records and access-request procedure.	Private Bodies
4	Section 52 of PAIA	Allows a private body to publish records that are available without a formal request.	Private Bodies
5	Sections 53–54 of PAIA	Provide for requests to private bodies and applicable access fees. The prescribed Form 2 and fee schedule must be followed.	Private Bodies

No.	Section of the Act	Legislative Summary	Applies To
6	Sections 63–69 of PAIA	Set refusal grounds protecting personal information, commercial information, confidential information, safety, privilege and other interests.	Private Bodies
7	Section 77A and section 78 of PAIA	Provide for complaints to the Information Regulator and applications to court in accordance with PAIA.	Requesters / Regulator
8	Sections 8–11 of POPIA	Set conditions for lawful processing, including accountability, processing limitation and purpose specification.	Responsible Parties
9	Sections 14, 19 and 22 of POPIA	Address retention, security safeguards and notification of security compromises.	Responsible Parties
10	Sections 23–25 of POPIA	Provide data subjects with access, correction and deletion rights, subject to the Act.	Data Subjects
11	Sections 55–56 of POPIA	Set Information Officer responsibilities and assignment of Deputy Information Officers, where applicable.	Information Officers

16 List of Acronyms and Abbreviations

No.	Acronym	Meaning
1	CEO	Chief Executive Officer
2	CIPC	Companies and Intellectual Property Commission
3	FICA	Financial Intelligence Centre Act 38 of 2001
4	FSCA	Financial Sector Conduct Authority
5	FSP	Financial Services Provider
6	HR	Human Resources
7	ICT	Information and Communications Technology
8	IO	Information Officer

No.	Acronym	Meaning
9	KYC	Know Your Customer
10	PAIA	Promotion of Access to Information Act 2 of 2000, as amended
11	POPIA	Protection of Personal Information Act 4 of 2013
12	Regulator	Information Regulator of South Africa
13	SARS	South African Revenue Service
14	UIF	Unemployment Insurance Fund