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Created by	Hannetjie van der Vyver
Key Individual	Hannetjie van der Vyver
Signature	<i>Hannetjie van der vyver</i>

MANUAL STATEMENT

This PAIA Manual is issued by Hennox 503 CC trading as UMA Underwriting Consultants ("UMA") to promote transparent, lawful and responsible access to information held by the organisation.

All directors, management, employees, representatives and persons acting on behalf of UMA are required to support the effective implementation of this Manual and to refer PAIA requests to the designated Information Officer / Deputy Information Officer.

MANUAL APPROVAL

By signing this document, I authorise the approval and adoption of the processes and procedures contained in this PAIA Manual.

Name & Surname	Hannetjie van der Vyver
Capacity	Operational Manager Key Individual Deputy Information Officer
Signature	Hannetjie van der vyver
Date	17/09/2026

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1. PURPOSE AND LEGISLATIVE FRAMEWORK

This Manual is prepared in accordance with section 51 of the Promotion of Access to Information Act 2 of 2000 (“PAIA”), as amended, and is intended to facilitate lawful access to records held by Hennox 503 CC trading as UMA Underwriting Consultants (“UMA”).

The Manual must be read together with the Protection of Personal Information Act 4 of 2013 (“POPIA”), the Regulations relating to PAIA, 2021, and applicable guidance and prescribed forms issued by the Information Regulator.

Section 51 requires a private body to make a PAIA Manual available and to update it regularly. The Information Regulator provides a PAIA Manual template and eServices facility for private bodies.

2. SCOPE AND APPLICATION

This Manual applies to information and records held by UMA in its capacity as a private body and to requests for access made in terms of PAIA.

PAIA does not create an unrestricted right to every record held by UMA. Access is subject to the requirements and grounds for refusal contained in PAIA, including the protection of third-party information, confidential information, commercial information and legally privileged information.

Where a requester seeks access to their own personal information, the request may also be dealt with under the applicable provisions of POPIA.

3. KEY CONTACT DETAILS

Designation	Details
Private Body	Hennox 503 CC trading as UMA Underwriting Consultants
FSP Number	24370
Information Officer	Bianca Koen
Information Officer Email	bianca@allabout.co.za
Deputy Information Officer	Hannetjie van der Vyver
Deputy Information Officer Telephone	016 423 6467
Deputy Information Officer Email	hannetjie@umacons.co.za
Postal Address	135 General Hertzog Avenue, Three Rivers, Vereeniging, 1935
Physical Address	135 General Hertzog Avenue, Three Rivers, Vereeniging, 1935
General Telephone	016 423 6467
General Email	uma@umacons.co.za
Website	www.umacons.co.za

PAIA requests must be directed to the Information Officer or Deputy Information Officer at the contact details above. UMA will maintain the required registration and designation information with the Information Regulator.

4. GUIDE ON HOW TO USE PAIA

The Information Regulator has issued a Guide on how to use PAIA, as contemplated by section 10 of PAIA. The Guide explains the objects of PAIA and POPIA, how to request records, available assistance, fees, remedies and complaints.

The Guide is available from the Information Regulator's website and eServices portal and may also be requested from UMA's Information Officer. The Information Regulator provides the Guide in multiple official languages and formats, including accessible formats.

Current prescribed PAIA forms include Form 1 (Guide), Form 2 (Request for Access to Record), Form 3 (Outcome and Fees), Form 4 where an internal appeal is applicable, and Form 5 (Complaint to the Information Regulator). For a private body such as UMA, Form 2 is the prescribed request form and Form 5 may be used for a complaint where applicable.

5. CATEGORIES OF RECORDS AUTOMATICALLY AVAILABLE

UMA may make the following categories of records available without requiring a formal PAIA request, subject to applicable confidentiality, privacy and legal restrictions:

Category	Examples	Availability
Corporate / Regulatory Information	FSP details, public regulatory information, approved policies or notices intended for public access	Website / Request
PAIA / POPIA Information	PAIA Manual, privacy-related notices and public compliance information	Website / Request
General Business Information	General information about UMA's services and contact details	Website / Request
Client Information	A client's own policy or claim information, where the requester is properly identified and access is otherwise lawful	Request

Automatic availability does not require UMA to disclose information that is protected by law, contains another person's personal information, is confidential or falls within a ground for refusal under PAIA.

6. RECORDS AVAILABLE IN TERMS OF OTHER LEGISLATION

Category of Records	Applicable Legislation
Memorandum / founding and company records, where applicable	Companies Act 71 of 2008
Financial and accounting records	Companies Act 71 of 2008; applicable tax legislation
Insurance / intermediary records	Financial Advisory and Intermediary Services Act 37 of 2002 and applicable subordinate legislation
Client and policy records	Applicable insurance, FAIS and contractual requirements
PAIA Manual and access-to-information records	Promotion of Access to Information Act 2 of 2000
Personal information records	Protection of Personal Information Act 4 of 2013
FICA / AML records, where applicable	Financial Intelligence Centre Act 38 of 2001 and applicable regulations
Employment records	Basic Conditions of Employment Act 75 of 1997; Labour Relations Act 66 of 1995; other applicable employment legislation

The existence of a record under another law does not automatically mean that the record is freely accessible. Access remains subject to the applicable legislation, confidentiality obligations and the grounds for refusal in PAIA.

7. SUBJECTS ON WHICH UMA HOLDS RECORDS

Subject	Examples of Records
Governance & Compliance	Policies, procedures, regulatory correspondence, compliance records, PAIA/POPIA records
Corporate / Legal	Company records, agreements, legal correspondence, contracts and registers
Finance & Accounting	Invoices, payments, accounting records, budgets, financial statements and tax records
Human Resources	Employment contracts, personnel records, payroll-related records, leave, training and disciplinary records
Clients / Policyholders	Client details, policy records, underwriting information, correspondence, claims information and related documentation
Insurance Administration	Policy schedules, endorsements, quotations, renewals, claims and insurer correspondence
Intermediaries / Brokers	Broker appointments, agreements, commission records and correspondence
Service Providers / Suppliers	Contracts, invoices, due diligence, banking and contact information
IT & Information Security	System access records, backups, security controls, incident records and related documentation
Marketing & Communications	Website, communications, promotional and general client communication records

The categories above are descriptions of record subjects and are not an undertaking that every record listed exists at all times or will be disclosed. Records may be subject to statutory retention periods and lawful destruction in accordance with UMA's record-retention practices.

8. PROCEDURE FOR REQUESTING ACCESS TO RECORDS

A requester must use the prescribed PAIA Form 2 when requesting access to a record of UMA. The request must be submitted to the Information Officer or Deputy Information Officer at the address or email stated in section 3.

- Provide sufficient particulars to enable UMA to identify the record requested.
- State which form of access is required, where reasonably possible.
- Provide the requester's contact details and any other information required by Form 2.
- Where the request is made on behalf of another person, provide proof of authority where required.
- Pay the prescribed request fee where applicable. A requester may be required to pay the prescribed request fee before further processing of the request.

UMA will assist a requester to comply with the prescribed procedure where reasonably necessary, without waiving any legal requirement or ground for refusal.

9. GROUNDS FOR REFUSAL AND SEVERABILITY

UMA will assess each request in accordance with PAIA. Access may be refused where a statutory ground for refusal applies. Depending on the record, this may include protection of:

- Personal information of a third party;
- Commercial information, trade secrets or confidential information of UMA or another person;
- Confidential information supplied by a third party;
- Information subject to legal professional privilege;
- Information relating to safety, security or other protected interests where the Act permits refusal;
- Records whose disclosure is prohibited or restricted by another law;
- Other records falling within a mandatory or discretionary ground for refusal under PAIA.

Where reasonably possible, UMA will consider severing a portion of a record containing information that may be refused so that the remainder can be disclosed in accordance with section 59 of PAIA.

10. DECISION ON A REQUEST AND TIME PERIODS

UMA will make a decision on a PAIA request within the period prescribed by PAIA, generally within 30 days after receipt of the request, subject to the Act.

UMA may extend the response period once for a further period of not more than 30 days where the circumstances contemplated in section 57 apply. Written notice of the extension and the reasons for it will be provided within the period prescribed by PAIA.

If UMA does not make a decision within the applicable statutory period, the request may be regarded as refused in terms of PAIA.

A decision to grant or refuse access will be communicated to the requester. Where access is refused, UMA will provide the reasons required by PAIA and inform the requester of the applicable right to lodge a complaint with the Information Regulator and/or approach a court, as applicable.

11. FEES PAYABLE

The prescribed PAIA fees applicable to private bodies are subject to the Regulations and any updated fee schedule issued by the Information Regulator. The current fee structure published by the Information Regulator includes a R140 request fee for a private body and prescribed charges for copies, electronic media, transcription, search and preparation, deposits and delivery.

Private Body Fee Item	Current Prescribed Amount
Request fee	R140.00
Photocopy / printed black-and-white A4 page	R2.00 per page or part thereof
Computer-readable copy – flash drive provided by requester	R40.00
Computer-readable copy – CD provided by requester	R40.00
Computer-readable copy – CD provided by UMA	R60.00
Transcription of audio record – A4 page	R24.00
Search and preparation – each hour or part of an hour after the first hour	R145.00
Maximum search and preparation charge	R435.00
Deposit where search exceeds six hours	One third of the estimated amount for the relevant access fees
Postage / e-mail / electronic transfer	Actual expense, if any

Fees will be applied in accordance with the Regulations and the Information Regulator's current published fee structure. If the applicable fee schedule changes, the current prescribed amount will apply.

12. REMEDIES AND COMPLAINTS

For a private body, there is no internal PAIA appeal process of the type applicable to decisions by certain public bodies. A requester or third party who is dissatisfied with UMA's decision or non-response may lodge a complaint with the Information Regulator in the prescribed manner, subject to the requirements of PAIA.

A complaint may be lodged using PAIA Form 5. The Information Regulator's current contact details include PAIAComplaints@infoRegulator.org.za and telephone 010 023 5200. The Regulator may investigate a complaint or refer it to the Enforcement Committee in accordance with its powers.

A requester may also have a right to approach a court in accordance with PAIA. The applicable statutory periods and procedural requirements must be observed.

13. PROCESSING OF PERSONAL INFORMATION (POPIA)

UMA processes personal information for legitimate business, insurance, underwriting, client service, regulatory, contractual, employment, risk management and record-keeping purposes, subject to POPIA and other applicable laws.

Category of Data Subject	Examples of Personal Information
Clients / Policyholders / Insured Persons	Names, contact details, identity or registration information, addresses, banking details, policy and claims information and information relevant to underwriting
Prospective Clients	Contact details, risk information, quotation information and other information required to assess requested services
Brokers / Intermediaries	Names, contact details, FSP / regulatory information, commission and contractual information
Employees / Applicants	Contact details, identity information, qualifications, employment records, payroll and statutory information
Service Providers / Suppliers	Names, contact details, registration / VAT details, banking information, contractual and due-diligence information

Personal information may be supplied, where lawful and necessary, to insurers, underwriting managers, administrators, brokers, service providers, regulators, law-enforcement authorities, professional advisers, auditors, credit bureaus or other recipients where permitted or required by law or contract.

UMA does not currently plan routine transborder flows of personal information. Where personal information is transferred outside South Africa, UMA will apply the requirements of POPIA and any other applicable law.

Data subjects may exercise their rights under POPIA, including rights relating to access, correction and lawful processing, subject to applicable legal limitations.

14. INFORMATION SECURITY MEASURES

UMA implements reasonable technical and organisational measures designed to protect information against loss, damage, unauthorised access, interference, modification, disclosure or destruction.

- Access controls and password protection;
- Multi-factor authentication (MFA) where implemented;
- Encryption of data and client documentation where appropriate;
- Anti-virus and anti-malware controls;
- Controlled access to physical and electronic records;
- Backups and business continuity measures;
- Confidentiality obligations applicable to employees and service providers;
- Incident identification, escalation and response procedures.

Security measures are reviewed and improved as reasonably necessary in light of changes in technology, threats, business processes and applicable legal requirements.

15. AVAILABILITY OF THE PAIA MANUAL

This Manual will be made available in accordance with PAIA. A copy may be obtained:

- On UMA's website, where published;
- At UMA's head office during normal business hours;
- By requesting a copy from the Information Officer or Deputy Information Officer;
- Through the Information Regulator's prescribed PAIA mechanisms, where applicable.

The Information Regulator requires private bodies to make their PAIA Manuals publicly available and provides an eServices facility for PAIA Manuals, annual reporting and related compliance services.

16. UPDATING AND REVIEW OF THE MANUAL

UMA will review and update this Manual regularly and whenever there are material changes to the organisation, its records, information-processing activities, designated Information Officers, applicable legislation, prescribed forms or regulatory requirements.

The latest approved version should be used when dealing with PAIA requests.

ANNEXURE A – PAIA FEE SCHEDULE

The following schedule reflects the private-body fees published by the Information Regulator in 2026. If the prescribed fees are amended, the amended statutory fee schedule will apply.

Item	Fee
Request fee	R140.00
Photocopy / printed black-and-white A4 page	R2.00
Flash drive supplied by requester	R40.00
CD supplied by requester	R40.00
CD supplied by UMA	R60.00
Audio transcription per A4 page	R24.00
Search and preparation after first hour	R145.00 per hour/part
Maximum search and preparation	R435.00
Deposit where search exceeds 6 hours	One third of estimated applicable access fees
Postage / electronic transfer	Actual expense, if any

The current fee schedule should be checked against the Information Regulator's latest published PAIA fee structure before a fee is charged.

ANNEXURE B – INTERNAL PAIA REQUEST HANDLING CHECKLIST

Step	Action	Responsible
1	Receive and date-stamp / record the Form 2 request.	Information Officer / DIO
2	Verify requester identity and authority where required.	Information Officer / DIO
3	Check whether the requested record is held by UMA.	Information Officer / Relevant department
4	Identify third-party information and potential grounds for refusal.	Information Officer / Relevant department
5	Calculate and request the prescribed request fee, where applicable.	Information Officer / Finance
6	Search, retrieve and assess the records within the statutory period.	Information Officer / Relevant department
7	Consider severability where only part of a record may lawfully be disclosed.	Information Officer
8	Issue the prescribed outcome / decision and applicable fee notice.	Information Officer
9	Arrange access in the approved form after applicable fees are dealt with.	Information Officer / DIO
10	Record the request, decision, fees and outcome for PAIA reporting and audit purposes.	Information Officer
11	Where appropriate, assist with information required for a complaint or regulatory process.	Information Officer / DIO

DOCUMENT CONTROL AND ISSUED BY

Document	Details
Document	PAIA Manual
Legal Basis	Section 51 of PAIA
Organisation	Hennox 503 CC trading as UMA Underwriting Consultants
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Information Officer	Bianca Koen
Deputy Information Officer	Hannetjie van der Vyver

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Deputy Information Officer