XINIX (Pty) Ltd Manual in terms of The Promotion of Access to Information Act 2 of 2000 (PAIA).

1. INTRODUCTION

We are XINIX (Pty) Ltd, an authorised financial services provider (FSP) operating within the financial services industry in South Africa and registered with the Financial Sector Conduct Authority.
We are licenced for Short-term Insurance: Personal and Commercial Lines, as well as Long-term Insurance: Life and Investments.

Our client-base consists of natural persons as well as legal entities operating within South Africa, and our primary role is to source and provide insurance solutions for our clients.

We shall use our reasonable best efforts to provide services in a commercially reasonable manner and with the care, diligence and skill that a prudent FSP would possess and exercise.

The purpose of this Manual is to tell you what type of information we have, and where applicable help you to access our information and any other information that we have.

2. OUR DETAILS

Our details are as follows:

Registered Company Name:	XINIX (Pty) Ltd
Registration Number:	2012/138478/07
Date of Incorporation:	01/08/2012
FSP Number:	44147
Business Address:	12 Patrick Ave Olivedale Randburg 2188 South Africa
Postal Address:	P O Box 68475 Bryanston 2021
Telephone:	087 724 1000
Website:	www.xinixinsurance.co.za
Director:	Mr Suren Kasil

We have appointed one information officer for our company.

Information Officer	Mr Suren Kasil
Business and Postal Address	Same as above
Contact details	Telephone: 087 724 1000 Email: suren@xinixinsurance.co.za

3. THE ACT

3.1 Some key objectives of the Promotion of Access to Information Act (PAIA) are to promote transparency, accountability and effective governance of all public and private bodies.

3.2 The Information Regulator is responsible for the regulatory mandate functions relating to PAIA.

3.3 PAIA grants a requester access to records of our company, if the record is required for the exercise or protection of any rights. If a public body lodges a request, the public body must be acting in the public interest.

3.4 Requests in terms of PAIA shall be made in accordance with the prescribed procedures, at the rates provided. The forms and charges are dealt with in paragraphs 6 and 7.

3.5 Requesters are referred to the 'Guide' compiled by the Information Regulator, which is available in a range of official languages and contains information for the purposes of exercising constitutional rights.
Please contact the Information Regulator or visit their website for more information on how you can get access to information under PAIA, and to access the Guide.

The contact details of the Information Regulator are:

Postal address:	P O Box 3153, Braamfontein, Johannesburg, 2017
Physical address:	Woodmead North Office Park, 54 Maxwell Drive, Woodmead, Johannesburg, 2191.
Phone number:	010 023 5200
Website:	https://www.inforegulator.org.za
E-Mail address:	enquiries@inforegulator.org.za (general enquiries)

An electronic copy of the Guide can also be made available upon request in writing to our information officer, or from our office for public inspection during normal office hours.

The Information Regulator has compiled the Guide in the following official languages, English, Afrikaans, isiNdebele, isiXhosa, isiZulu, Siswati, Sepedi, Sesotho, Setswana, Tshivenda, and Xitsonga.

4. APPLICABLE LEGISLATION

The records we hold for the purposes of PAIA are in terms of various laws; the main laws are as follows, although not limited to:

Ref	**Act**
No 75 of 1997	Basic Conditions of Employment Act
No 53 of 2003	B-BBEE Act
No 55 of 1998	Employment Equity Act
No 130 of 1993	Compensation for Occupational Injuries and Disease Act
No 66 of 1995	Labour Relations Act
No 85 of 1993	Occupational Health and Safety Act
No 30 of 1996	Unemployment Insurance Act
No 68 of 2008	Consumer Protection Act
No 61 of 1973	Companies Act
No 25 of 2002	Electronic Communications and Transactions Act

No 37 of 2002	Financial Advisory and Intermediary Services Act
No 121 of 1998	Prevention of Organised Crime Act
No 38 of 2001	Financial Intelligence Centre Act
No 12 of 2004	Prevention & Combating of Corrupt Activities
No 33 of 2004	Prevention of Constitutional Democracy Against Terrorist & Related Activities
No 2 of 2000	Promotion of Access of Information Act
No 4 of 2013	Protection of Personal Information Act
No 89 of 1991	Value Added Tax Act
No 19 of 2020	Cybercrimes Act

5. ACCESS TO RECORDS AND AVAILABILITY

We hold the following subjects and categories of records.
Please be advised that, as specified below, not all records are automatically available. The method of requesting information is detailed further on in this Manual.

Records	Subject	Availability
Public Affairs	Information on our services Marketing material Public corporate records Media releases	Available on our website at www.xinixinsurance.co.za
Company and Business	Financial records Operational records Databases Information Technology Marketing records Internal correspondence Product records Statutory records Internal policies and procedures Treasury related records Securities and equities Records held by officials of XINIX	Not automatically available. We are a Proprietary Limited (Pty Ltd)– and we are not required to disclose this information or make it freely available
	Documents of incorporation Directors' names	Available from CIPC (Companies and Intellectual Property Commission)
Human Resources	Records relating to current and previous staff Contractual agreements with service providers and consultants	Not automatically available
Client information (include both juristic and natural entities that receive a service from XINIX)	Any records a client has provided to a third party acting on behalf of XINIX; any records a Third Party has provided to XINIX; and records generated by or within XINIX pertaining to the	Not automatically available

	client, including transactional records.	

Description of the categories of data subjects (the individual to which the information relates) and of the information or categories of information relating thereto, in terms of the information we process:

Categories of Data Subjects	Personal Information that may be processed includes
Service providers and consultants	Names, registration number, VAT numbers, address, trade secrets and bank details.
Employees	Name, address, phone and personal e-mail contact, qualifications, salary, bank details, gender, race, religion, next of kin, medical details, and disciplinary matters.
Directors and shareholders	Same as 'Employees'
Our clients	Domestic and Commercial policyholders: Name, ID number, company registration number, details of directors, e-mail address, physical address, telephone and cell phone numbers, details of assets with the risk address and security details, banking details, finance arrangements, claims history, risk profiles, full health and medical disclosures - including "special personal information" i.e., children.

Our purposes for processing personal information, who we share information with, any transborder flows of such information, as well as our information security measures are detailed within our Privacy policy, which is available upon request from our office.

6. HOW TO REQUEST ACCESS TO RECORDS

To facilitate the processing of your request, kindly:

6.1 Use the prescribed form, available on the website of the Information Regulator at https://www.inforegulator.org.za under the section 'PAIA / Forms'.

- Form 02: Request for Access to Record [Regulation 7]

6.2 Address your request to our Information Officer.

6.3 Provide sufficient details to enable us to identify:

(a) The record(s) being requested;
(b) The requester (and if an agent is lodging the request, proof of capacity);
(c) The form of access required;
(d) (i) The postal address, email address or fax number of the requester in the Republic;
(ii) If the requester wishes to be informed of the decision in any manner (in addition to written), the manner and particulars thereof;
(e) The right which the requester is seeking to exercise or protect with an explanation of the reason the record is required to exercise or protect the right.

All requests will be carefully considered in terms of PAIA. Our Information Officer will notify you in writing as to whether your request for access has been approved or denied. You will receive such notification within 30 days after we have received the fully completed request form.

Please note that in certain cases, we may refuse you access to the requested record/s to protect others. This can include the following instances where we have a duty to:

- Protect the privacy of a third party
- Protect confidential information in terms of an agreement
- Protect the privacy and safety of a person or a juristic person
- Protect information in legal proceedings

You will however be notified of the reasons in writing should we refuse to provide the requested record/s to you.

If your request for access is denied or we do not handle your request in an acceptable manner, and after allowing us the opportunity to respond to and attempt to resolve the issue, you are still dissatisfied, you may lodge a complaint with the Information Regulator by completing a Complaint Form and submitting it to PAIAComplaints@inforegulator.org.za, or you can complete the online complaint form available at https://www.inforegulator.org.za
The Complaint Form is available on the website of the Information Regulator under the section 'PAIA / Forms'.

7. PRESCRIBED FEES

You will be required to pay a fee to us, as stipulated by law, before your request is considered or the records that you have requested are made available to you. Records may be withheld until the applicable fee/s have been paid. You may have to pay a further access fee for any time that has exceeded the prescribed hours to search and prepare the requested record/s.

The prescribed fees are set out in Annexure B of the *Regulations relating to the Promotion of Access to Information, 2021*, as issued by the Information Regulator.
A copy of the *Regulations* can be made available upon request to our Information Officer.

Please refer to 'Form 03: Outcome of request and of fees payable [Regulation 8]' which is available on the website of the Information Regulator under the section 'PAIA / Forms'.

8. AVAILABILITY OF OUR MANUAL

Our Manual, in English, is available via our website or at our company office.

9. UPDATES TO OUR MANUAL

We may update this Manual at any time and without notice to you whenever we make material changes to the current information, by publishing an updated version on our website, and from the stated revision date our amended Manual will then be applicable.