

KSURE TECHNOLOGY SOLUTIONS (PTY) LTD

PAIA MANUAL

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

**DATE OF COMPILATION: 18/08/2026
DATE OF REVISION: 18/08/2026**

TABLE OF CONTENTS

1.	LIST OF ACRONYMS AND ABBREVIATIONS.....	3
2.	PURPOSE OF PAIA MANUAL	3
3.	KEY CONTACT DETAILS FOR ACCESS TO INFORMATION OF K-SURE	4
4.	GUIDE ON HOW TO USE PAIA AND HOW TO OBTAIN ACCESS TO THE GUIDE	5
5.	CATEGORIES OF RECORDS OF K-SURE WHICH ARE AVAILABLE WITHOUT A PERSON HAVING TO REQUEST ACCESS.....	7
6.	DESCRIPTION OF THE RECORDS OF K-SURE WHICH ARE AVAILABLE IN ACCORDANCE WITH ANY OTHER LEGISLATION ...	8
7.	DESCRIPTION OF THE SUBJECTS ON WHICH K-SURE HOLDS RECORDS AND THE CATEGORIES OF RECORDS HELD ON EACH SUBJECT	9
8.	PROCESSING OF PERSONAL INFORMATION	10
9.	AVAILABILITY OF THE MANUAL	14
10.	UPDATING OF THE MANUAL	15

1. LIST OF ACRONYMS AND ABBREVIATIONS

1.1	“CEO”	Chief Executive Officer;
1.2	“DIO”	Deputy Information Officer;
1.3	“IO”	Information Officer;
1.4	“K-Sure”	KSure Technology Solutions (Pty) Ltd;
1.5	“MD”	Managing Director;
1.6	“Minister”	Minister of Justice and Correctional Services;
1.7	“PAIA”	Promotion of Access to Information Act No. 2 of 2000 (as amended);
1.8	“POPIA”	Protection of Personal Information Act No. 4 of 2013;
1.9	“Regulator”	Information Regulator; and
1.10	“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 a body which are available without a person having to submit a formal PAIA request;
- 2.2 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;
- 2.3 know the description of the records of the body which are available in accordance with 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 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;
- 2.7 know the description of the categories of data subjects and of 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 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
- 2.10 know whether the body has appropriate security measures to ensure the confidentiality, integrity and availability of the personal information which is to be processed.

3. KEY CONTACT DETAILS FOR ACCESS TO INFORMATION OF KSURE TECHNOLOGY SOLUTIONS (PTY) LTD

3.1 Information Officer

Name: Kirvania Govender
Designation: CEO
Tel: 064 5165 316
Email: Kirvaniag@ksure.co.za
Fax number: N/A

3.2 Deputy Information Officer

Name: Kirvania Govender
Designation: CEO
Tel: 064 5165 316
Email: Kirvaniag@ksure.co.za
Fax number: N/A

3.3 Access to information general contacts

Email: info@ksure.co.za

3.4 National or Head Office

Postal Address: Available on request

Physical Address: Available on request

Telephone: 064 5165 316

Email: info@ksure.co.za

Website: www.ksure.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-

¹Section 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.*

²Section 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.*

- 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-
 - 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. 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;

³Section 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.*

⁴Section 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.*

⁵Section 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.*

⁶Section 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.*

- 4.3.8. the provisions of sections 15⁷ and 52⁸ providing for the voluntary disclosure of categories of records by a public body and private body, respectively;
- 4.3.9. the notices issued in terms of sections 22⁹ and 54¹⁰ regarding fees to be paid in relation to requests for access; and
- 4.3.10. 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/infoereg/>).
- 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 Afrikaans.

5. CATEGORIES OF RECORDS OF K-SURE WHICH ARE AVAILABLE WITHOUT A PERSON HAVING TO REQUEST ACCESS

⁷Section 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*

⁸Section 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*

⁹Section 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.*

¹⁰Section 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.*

¹¹Section 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.”

The following categories of records held by K-Sure are automatically available, without a person having to submit a formal request for access in terms of PAIA-

Category of records	Types of the Record	Available on Website	Available upon request
Company information	Company profile, "About Us" information, business overview and contact details		X
List of introducers	Introducer programme overview, introducer application form and related terms		X

Records in the above categories may be downloaded from www.ksure.co.za or obtained by sending a request to info@ksure.co.za, or by telephoning 064 516 5316 during normal business hours.

6. DESCRIPTION OF THE RECORDS OF K-SURE WHICH ARE AVAILABLE IN ACCORDANCE WITH ANY OTHER LEGISLATION

K-Sure creates and holds the following categories of records in accordance with the legislation listed below. Records are made available in accordance with the requirements of, and to the persons entitled to them under, that legislation, and not automatically to the public-

Category of Records	Applicable Legislation
Memorandum of Incorporation, statutory registers, registers of directors and shareholders, and company resolutions	Companies Act 71 of 2008
PAIA Manual	Promotion of Access to Information Act 2 of 2000

K-Sure does not currently conduct licensed insurance or intermediary business. The records described in the last two rows above will be created and maintained once K-Sure commences the relevant licensed activities.

7. DESCRIPTION OF THE SUBJECTS ON WHICH K-SURE HOLDS RECORDS AND THE CATEGORIES OF RECORDS HELD ON EACH SUBJECT

Subjects on which the body holds records	Categories of records
Introducer and partner network	Introducer registration and application records, introducer company names and registration numbers, contact details, category of business sold, records of the number of clients and potential leads, introducer agreements and commission arrangements
Marketing and lead generation	Website enquiry and expression-of-interest submissions, mailing and distribution lists, marketing consents and opt-outs, campaign records, marketing material
Client and policyholder records	Prospective policyholder contact details and enquiry records; and, once operational, application forms, policy records, premium and payment records, claims records and correspondence
Human resources	HR policies and procedures, advertised posts and applications, employment contracts, employee personal records, qualifications, leave and attendance records, payroll and disciplinary records
Legal and compliance	PAIA Manual, privacy notice, POPIA compliance and consent records, contracts and service level agreements with suppliers and operators, complaints register, correspondence with regulators

8. PROCESSING OF PERSONAL INFORMATION

8.1 Purpose of Processing Personal Information

K-Sure processes personal information for the following purposes-

- 8.1.1 to register, verify and manage introducers who refer or intend to refer business to K-Sure, including recording the category of business they sell and the number of clients and potential leads they are able to introduce;
- 8.1.2 to record and respond to expressions of interest received from prospective policyholders and other interested parties through K-Sure's website and other channels;
- 8.1.3 to build and maintain a database of introducers, leads and prospective clients in anticipation of the commencement of K-Sure's insurance distribution activities;

- 8.1.4 to communicate with introducers, prospective policyholders and interested parties regarding K-Sure's products and services, including direct marketing where the data subject has consented or is an existing customer;
- 8.1.5 once K-Sure is licensed and operational, to quote on, arrange, administer, service and renew insurance policies and to administer claims;
- 8.1.6 to conclude and manage agreements with introducers, insurers, underwriting managers, suppliers and other service providers;
- 8.1.7 to recruit, employ and manage employees, contractors and representatives;
- 8.1.8 to comply with K-Sure's legal, regulatory, tax, reporting and record-keeping obligations, and to establish, exercise or defend legal claims; and
- 8.1.9 to maintain the security, integrity, accuracy and availability of K-Sure's systems, website and records, including the detection and prevention of fraud.
- 8.2 Description of the categories of Data Subjects and of the information or categories of information relating thereto**

Categories of Data Subjects	Personal Information that may be processed
Introducers and their representatives	Company or business name, company registration number, name and surname of the contact person, email address, telephone number, category of business sold, number of clients and number of potential leads, and (where an agreement is concluded) banking details and tax details
Prospective policyholders and other interested parties	Email address, and any name, telephone number or other contact details voluntarily submitted through K-Sure's website enquiry or expression-of-interest forms
Policyholders and clients (once K-Sure is operational)	Name and surname, identity or passport number, date of birth, contact details, physical and postal address, occupation and employment status, banking and payment details, insurance and claims history, and information relating to the risk to be insured
Employees, representatives and job applicants (once K-Sure is operational)	Name and surname, identity number, contact details, physical address, curriculum vitae, qualifications, employment history, gender and race, remuneration and banking details, tax reference number, and disciplinary and performance records

Categories of Data Subjects	Personal Information that may be processed
Service providers and suppliers	Business name, company registration number, VAT number, address, name and contact details of the contact person, banking details and contractual information
Directors and shareholders	Name and surname, identity number, contact details, physical address, and details of directorship and shareholding

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
Introducer details and lead information	Insurers, underwriting managers and product providers with whom K-Sure places or intends to place business
Contact details submitted through the website, and marketing lists	K-Sure's website host and online form provider, and its email, hosting and customer relationship management service providers
Names, identity numbers and verification information	Identity and credit verification bureaus, and the Financial Intelligence Centre (once K-Sure is an accountable institution)
Client, policy and claims information (once operational)	Insurers, underwriting managers, reinsurers, claims administrators, assessors and loss adjusters
Financial, accounting and tax records	South African Revenue Service, and K-Sure's accountants, auditors and bankers
Employee information	South African Revenue Service, the Unemployment Insurance Fund, payroll service providers, and retirement fund and medical scheme administrators (where applicable)
Any personal information, where legally required	The Information Regulator, the Financial Sector Conduct Authority, the South African Police Service, courts, ombud schemes and other regulators or authorities entitled to the information by law
Any personal information, in legal proceedings	K-Sure's attorneys and legal advisors

8.4 Planned transborder flows of personal information

- 8.4.1 K-Sure collects introducer information and expressions of interest through online forms on its website. Those forms are processed using Netlify Forms, and the underlying hosting and form-processing infrastructure is located outside the Republic, principally in the United States of America. Personal information submitted through K-Sure's website is therefore transferred to, and stored on, servers outside the Republic.
- 8.4.2 K-Sure may also make use of cloud-based email, file storage, marketing and customer relationship management services whose servers are located outside the Republic, including in the United States of America and the European Union.
- 8.4.3 The categories of personal information transferred outside the Republic are the company or business name, company registration number, contact person's name, email address, telephone number, category of business sold and number of clients and potential leads submitted by introducers, and the email address and any other contact details submitted by prospective policyholders and other interested parties.
- 8.4.4 K-Sure will only transfer personal information outside the Republic where one of the conditions in section 72 of POPIA¹² is met, and will contract with its cloud and hosting providers as operators in terms of section 21 of POPIA so that the personal information is subject to an adequate level of protection.

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

K-Sure has implemented, or is in the process of implementing, the following security safeguards-

- 8.5.1 encryption of personal information in transit through the use of HTTPS/TLS on the K-Sure website and its online forms;

¹²Section 72 of POPIA- A responsible party in the Republic may not transfer personal information about a data subject to a third party who is in a foreign country unless one of the conditions listed in section 72(1)(a) to (e) of POPIA is met, including where the recipient is subject to a law, binding corporate rules or a binding agreement which provides an adequate level of protection, or where the data subject consents to the transfer.

- 8.5.2 access control measures, including unique user accounts, strong passwords, multi-factor authentication where available, and access limited to those persons who require the information to perform their duties;
- 8.5.3 anti-virus and anti-malware software on devices used to access personal information, kept up to date;
- 8.5.4 firewall protection and secure configuration of the website, hosting environment and business systems;
- 8.5.5 regular backups of business records and databases, and testing of the ability to restore from those backups;
- 8.5.6 written operator agreements or applicable contractual data-processing terms, in terms of section 21 of POPIA, with third parties that process personal information on K-Sure's behalf, including its hosting, form-processing and email providers and other technology service providers, where applicable;
- 8.5.7 confidentiality undertakings in employment contracts and in agreements with introducers, suppliers and service providers;
- 8.5.8 physical security measures at any premises at which records are kept, and secure destruction of records that are no longer required;
- 8.5.9 awareness training for employees and representatives on their obligations under POPIA and on the handling of personal information; and
- 8.5.10 an incident response process for identifying, containing and investigating security compromises, and for notifying the Regulator and affected data subjects in terms of section 22 of POPIA.

9. AVAILABILITY OF THE MANUAL

- 9.1 A copy of the Manual is available-
 - 9.1.1 on www.ksure.co.za;
 - 9.1.2 at the head office of KSure Technology Solutions (Pty) Ltd 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 payable per each A4-size photocopy made.

10. UPDATING OF THE MANUAL

The head of KSure Technology Solutions (Pty) Ltd will on a regular basis update this manual.

Issued by

Kirvania Govender
CEO and Information Officer
KSure Technology Solutions (Pty) Ltd