



MUA INFORMATION MANUAL

PAIA AND POPIA

INFORMATION MANUAL

This manual has been prepared in accordance with the Promotion of Access to Information Act, No. 2 of 2000, as amended (hereinafter referred to as “PAIA”) and the Protection of Personal Information Act, 2013 (hereinafter referred to as “POPIA”).

1. PURPOSE

- 1.1 This manual serves to promote transparency and accountability by guiding individuals on how to request access to records held by MUA Insurance Acceptances (Pty) Ltd (“MUA”). It supports the constitutional right to access information necessary for the exercise or protection of any rights and outlines the procedures, contact details, and remedies available under PAIA.
- 1.2 This manual incorporates compliance with the Protection of Personal Information Act, 2013 (POPIA), which governs the lawful processing of personal information. It ensures that MUA handles personal data responsibly and in accordance with the rights of data subjects, including procedures for objections, corrections, and complaints as prescribed by the Information Regulator. For more information on processing of personal information and protection of data, refer to the Privacy Policy available on the MUA website.

2. DEFINITIONS

- 2.1 “**MUA**” means MUA Insurance Acceptances (Pty) Ltd (“MUA”), Registration No. 2008/011925/07, an underwriting manager for and on behalf of Compass Insurance Company Limited.
- 2.2 “**Customer**” means any natural or juristic person that received or receives services from the Company;
- 2.3 “**Data Subject**” has the meaning ascribed thereto in section 1 of POPIA;
- 2.4 “**Information Officer**” means the Company’s appointed Information Officer as referred to under the Contact Details in clause 4;
- 2.5 “**Manual**” means this information manual prepared in accordance with section 51 of PAIA and regulation 4(1) (d) of the POPIA Regulations;
- 2.6 “**The Act**” means the Promotion of Access to Information Act, 2000;
- 2.7 “**Personal Information**” has the meaning ascribed thereto in section 1 of POPIA;
- 2.8 “**POPIA**” means the Protection of Personal Information Act, 2013;
- 2.9 “**POPIA Regulations**” mean the regulations promulgated in terms of section 112(2) of POPIA;
- 2.10 “**Private Body**” has the meaning ascribed thereto in sections 1 of both PAIA and POPIA;
- 2.11 “**Processing**” has the meaning ascribed thereto in section 1 of POPIA;
- 2.12 “**Responsible Party**” has the meaning ascribed thereto in section 1 of POPIA;
- 2.13 “**Record**” has the meaning ascribed thereto in section 1 of PAIA and includes Personal Information;
- 2.14 “**Requester**” has the meaning ascribed thereto in section 1 of PAIA;
- 2.15 “**Request for Access**” has the meaning ascribed thereto in section 1 of PAIA.

3. INTRODUCTION TO MUA

MUA Insurance Acceptances (Pty) Ltd (“MUA”) is a specialist underwriting manager and an authorised Financial Services Provider, FSP No. 37947 underwriting for an on behalf of Compass Insurance Company Limited, a licensed non-life insurer and authorised Financial Services Provider, FSP Number 12148.

4. CONTACT DETAILS

Head of Company:	Mr Vajra Prakash Singh
Information Officer:	Mr Vajra Prakash Singh
Deputy Information Officers:	Grant Smith, Xiane Francis, Michelle Kirstein
Physical address:	Office 0009, Second Floor, Tijgerpark 5, Willie Van Schoor Drive, Bellville, 7530
Postal address:	Office 0009, Second Floor, Tijgerpark 5, Willie Van Schoor Drive, Bellville, 7530
Telephone:	021 525 6200
E-mail:	info@mua.co.za
Website:	www.mua.co.za

5. ACCESS TO INFORMATION IN TERMS OF PAIA

- 5.1 In terms of the Promotion of Access to Information Act, 2000 (PAIA), any person may request access to a record held by MUA, provided that the information is required for the exercise or protection of a right.
- 5.2 The requester must comply with the procedural requirements set out in PAIA, including the completion of the prescribed form and payment of applicable fees.
- 5.3 Access may be refused on grounds permitted by PAIA, such as the protection of privacy, commercial confidentiality, or legal privilege.
- 5.4 The requester is referred to the guide made available by the Information Regulator in terms of Section 10 of PAIA. It is available in all of the official languages from the Information Regulator. The website of the Regulator is: <https://infoeregulator.org.za/>.
- 5.5 Any person may submit a complaint to the Information Regulator. Complaints must be acknowledged within 14 days and assigned a reference number. Submission may be via email, phone, WhatsApp, or other reasonable channels.

6. MUA PRIVACY POLICY

- 6.1 MUA is committed to protecting the confidentiality and integrity of personal information. When a request for access to information is made by a third party, MUA will assess the request in line with applicable legal provisions and will not disclose any personal or confidential information unless:
 - 6.1.1 The disclosure is required by law, regulation, or a valid court order;
 - 6.1.2 The disclosure is necessary to comply with a lawful request from a regulatory authority;
 - 6.1.3 The disclosure is necessary to protect the safety of an individual or the public;
 - 6.1.4 The disclosure is necessary to prevent a violation of MUA's customer relationship terms.
- 6.2 For more information on processing of personal information and protection of data, refer to the Privacy Policy available on the MUA website.

7. GROUNDS FOR REFUSAL OF ACCESS TO INFORMATION:

The main grounds to refuse a request for information are:

- 7.1 Access must be refused if the disclosure would result in the unreasonable disclosure of personal information about a third party.

- 7.2 Access must be refused if the record would be regarded as privileged in legal proceedings.
- 7.3 Access may be refused if the record contains trade secrets; financial, commercial, scientific, or technical information that could harm the third party's interests; information supplied in confidence that could prejudice the third party in negotiations or competition.
- 7.4 Access may be refused if the record contains confidential information of MUA, and disclosure would breach a duty of confidence owed under an agreement.
- 7.5 Access may be refused if disclosure could reasonably be expected to endanger the life or physical safety of an individual or the security of property.
- 7.6 Access may be refused if the record contains research information that could expose the researcher, the subject, or MUA to serious disadvantage.
- 7.7 Access may be refused if the request is clearly frivolous or vexatious, or if it involves an unreasonable diversion of MUA's resources.
- 7.8 Access may be refused if the requested record cannot be found or does not exist, despite reasonable efforts to locate it.

8. REQUEST FOR ACCESS PROCEDURE

- 8.1 The Requester must complete the prescribed **Request for Access to Record form (Annexure 1)** to initiate a request. This form must be submitted to the Information Officer at the physical or electronic address specified in Clause 4 of this Manual.
- 8.2 The Requester is required to provide sufficient detail on the form to enable the Information Officer to clearly identify both the requested record and the identity of the Requester.
- 8.3 The Requester must indicate the preferred form of access to the record, as outlined in Clauses 9 and 10 of this Manual.
- 8.4 If the Requester wishes to be notified through a specific method (e.g., email, post), this must be clearly stated on the form, along with the necessary contact details.
- 8.5 The Requester must specify the right they seek to exercise or protect and provide a brief explanation of why access to the requested record is necessary for the exercise or protection of that right.
- 8.6 If the request is made on behalf of another individual, the Requester must submit satisfactory proof of authority or capacity to act on that person's behalf, as determined by the Information Officer.
- 8.7 Applicable fees for processing the request are detailed in **Fees Payable** (Annexure 1) of this Manual. Proof of payment must accompany the request form where required.

9. CATEGORIES OF RECORDS HELD BY MUA

MUA maintains records on the following categories and subject matters. However, please note that recording a category or subject matter in this Manual does not imply that a request for access to such records would be granted. All requests for access will be evaluated on a case-by-case basis in accordance with the provisions of the Act.

SUBJECT	CATEGORIES
Operational Information	Information pertaining to the company's business operations. It includes documentation such as contracts between the company and its agents or service providers, policies of insurance, applications for insurance, documents relating to payment of premium, claim documents, renewal documents, quotations for insurance, amendments to policies.
Administration	Information related to the routine internal operations of the Company, which generally holds little or no relevance to individuals outside the organization. It includes items such as internal telephone directories, address lists, company policies, internal contracts, employee records, and general administrative or "housekeeping" documentation.
Communications	This includes correspondence exchanged between individuals both within the Company and external parties.
Legal	The company records required by the Registrar of Companies in terms of the Companies Act, 61 of 1973.
	The insurance and related records required by the Authorities representing the Prudential Authority and the Financial Services Conduct Authority, as regulated by the Financial Sector Regulation Act, 9 of 2017, and in terms of the: (i) (ii) (iii) Insurance Act, 18 of 2017; Short-Term Insurance, 53 of 1998; Financial Advisory and Intermediary Services Act, 37 of 2002. The tax records filed in accordance with the: (iv) (v) Income Tax Act 58 of 1962, and Value-Added Tax Act, 89 of 1991. The human resources and related records required in terms of the: (vi) (vii) (viii) (ix) (x) (xi) Unemployed Insurance Act, 30 of 1966; Occupational Health and Safety Act, 85 of 1993; Labour Relations Act, 66 of 1995; Basic Conditions of Employment Act, 75 of 1997; Employment Equity Act, 55 of 1998; Skills Development Levies Act, 9 of 1999.

10. CATEGORIES OF RECORDS THAT ARE AVAILABLE WITHOUT REQUEST

- 10.1 The following records are automatically available without a person having to request access in terms of the Act.
 - 10.1.1 information that is in the public domain; e.g. social media, company website and marketing brochures.
 - 10.1.2 policies and procedures that must be made available in accordance with legislation, which include but is not limited to the Privacy Policy, PAIA Manual and Conflict of Interest Management Policy.
 - 10.1.3 advertisements and media statements.
- 10.2 This information may be inspected, collected, purchased or copied (at the prescribed fee for reproduction) at the Company's offices; e.g. marketing brochures.
- 10.3 Certain information is also freely available on the Company's website (www.mua.co.za).

11. THE FOLLOWING INFORMATION IS NOT AVAILABLE SAVE IN THE SPECIAL CIRCUMSTANCES PROVIDED FOR IN POPIA:

- 11.1 Personal information which means:
 - 11.1.1 information relating to the race, gender, sex, pregnancy, marital status, national, ethnic or social origin, colour, sexual orientation, age, physical or mental health, well-being, disability, religion, conscience, belief, culture, language and birth of the individual;
 - 11.1.2 information relating to the education or the medical, criminal or employment history of the individual or information relating to financial transactions in which the individual has been involved;
 - 11.1.3 any identifying number, symbol or other particular assigned to the individual;
 - 11.1.4 the address, fingerprints or blood type of the individual;
 - 11.1.5 the personal opinions, views or preferences of the individual, except where they are about another individual or about a proposal for a grant, an award or a prize to be made to another individual;
 - 11.1.6 correspondence sent by the individual that is implicitly or explicitly of a private or confidential nature or further correspondence that would reveal the contents of the original correspondence;
 - 11.1.8 the views or opinions of another individual about the individual;
 - 11.1.9 the views or opinions of another individual about a proposal for a grant, an award or a prize to be made to the individual, but excluding the name of the other individual where it appears with the views or opinions of the other individual; and
 - 11.1.10 the name of the individual where it appears with other personal information relating to the individual or where the disclosure of the name itself would reveal information about the individual.
- 11.2 Trade secrets of a third party
- 11.3 Financial, commercial, scientific or technical information, other than trade secrets, of a third party, the disclosure of which would be likely to cause harm to the commercial or financial interests of that third party
- 11.4 Information supplied in confidence by a third party, the disclosure of which could reasonably be expected
 - 11.4.1 to put that third party at a disadvantage in contractual or other negotiations;
 - 11.4.2 to prejudice the third party in commercial competition.

- 11.5 Information the disclosure of which would constitute an action for breach of a duty of confidence owed to a third party in terms of an agreement.
- 11.6 Information if its disclosure could reasonably be expected to endanger the life or physical safety of an individual.
- 11.7 Information the disclosure of which would be likely to prejudice or impair:
- 11.7.1 the security of a building, structure or system, including but not limited to, a computer or communication system; a means of transport; or any other property;
 - 11.7.2 methods, systems, plans or procedures for the protection of an individual in accordance with a witness protection scheme; the safety of the public or part of the public; or the security of the property contemplated in 11.7.1 above.
- 11.8 The record of a body if the record is privileged from production in legal proceedings unless the person entitled to the privilege has waived the privilege.
- 11.9 A record which:
- 11.9.1 contains trade secrets of the company;
 - 11.9.2 contains financial, commercial, scientific or technical information of the company the disclosure of which would be likely to cause harm to the commercial or financial interests of the company;
 - 11.9.3 contains information the disclosure of which could reasonably be expected to put the company at a disadvantage in contractual or other negotiations; or to prejudice the company in commercial competition;
 - 11.9.4 is a computer programme defined in the Copyright Act 1978 owned by the private body except insofar as it is required to give access to the record to which access is granted in terms of this Act;
 - 11.9.5 information the disclosure of which is likely to expose a third party for whom research is being or is to be carried out or the company itself or the person carrying out the research or the subject of the search, to serious disadvantage.
- 11.10 EXPANDED DATA SUBJECT RIGHTS
- Data subjects may exercise the following rights at no cost:
- 11.10.1 Object to the processing of personal information via multiple channels including email, phone, WhatsApp, and SMS.
 - 11.10.2 Request correction, deletion, or destruction of personal information at any time.
- These rights may be exercised by submitting the prescribed forms (Annexure 1) or by contacting the Information Officer using any reasonable communication method.
- 11.11 CONSENT REQUIREMENTS FOR DIRECT MARKETING
- 11.11.1 Consent for direct marketing must be explicit and obtained free of charge. Acceptable methods include phone, SMS, email, and WhatsApp.
 - 11.11.2 Telephonic consent must be recorded and stored securely and made available upon request by the Information Regulator.
- 11.12 MULTI-CHANNEL SUBMISSION FOR OBJECTIONS AND CORRECTIONS
- Requests to object to processing or to correct/delete personal information may be submitted via any reasonable communication channel, including email, WhatsApp, telephone, or SMS during office hours.

12. REMEDIES AVAILABLE WHEN MUA REFUSES A REQUEST FOR INFORMATION

12.1 Internal Remedies

MUA does not have internal appeal procedures. As such, the decision made by the Information Officer is final, and requestors will have to exercise such external remedies at their disposal if the request for information is refused, and the requestor is not satisfied with the answer supplied by the Information Officer.

12.2 External Remedies

A requestor that is dissatisfied with the information officer's refusal to grant access to any information may, within 180 days of notification of the last decision, apply to court for relief. Likewise, a third party dissatisfied with the information officer's decision to grant a request may, within 180 days of notification of the last decision, apply to court for relief.

It should be noted that notwithstanding any provision in this Act, the court may examine the record(s) in question. No record may be withheld from the court on any grounds. The court may not, however, disclose the contents of the record(s).

The court is empowered to grant any order that is just and equitable, including:

- confirming, amending or setting aside the information officer's decision
- requiring the information officer to take any action, or refrain from taking any action as identified by the court within a specified period;
- granting an interdict, interim or special relief, declaratory order or compensation; or costs.

13. AVAILABILITY OF THE MANUAL

This manual is available on www.mua.co.za or by requesting a copy by e-mail from the contact details as provided in paragraph 2 above. This manual does not include the fee structures in respect of private body.

The prescribed forms and fees for requests to private bodies are available on the website of the Information Regulator at <https://infoforegulator.org.za/> and the website of the Department of Justice and Constitutional Development at www.doj.gov.za.

This manual is owned by MUA Insurance Acceptances (Pty) Ltd ("MUA"), a duly authorised Financial Services provider.

VERSION	DATE	APPROVER	DESCRIPTION
V.2025 – C.2	24 July 2025	Vajra Prakash Singh	Review - amended regulations

ANNEXURE 1

- **REQUEST FOR ACCESS TO RECORDS OF PRIVATE BODY (In terms of Section 53 (1) of the Act and Regulation 7)**

Required for completion: FORM 2 - REQUEST FOR ACCESS TO RECORD available at <https://inforegulator.org.za/wp-content/uploads/2020/07/InfoRegSA-PAIA-Form02-Reg7.pdf>

- **OBJECTION TO THE PROCESSING OF PERSONAL INFORMATION (in terms Section 11(3) of the Protection of Personal Information Act, 2013 (Act No. 4 of 2013)**

Required for completion: FORM 1 – OBJECTION TO THE PROCESSING OF PERSONAL INFORMATION available at <https://inforegulator.org.za/wp-content/uploads/2020/07/FORM-1-OBJECTION-TO-THE-PROCESSING-OF-PERSONAL-INFORMATION.pdf>

- **REQUEST FOR CORRECTION OR DELETION OF PERSONAL INFORMATION OR DESTROYING OR DELETION OF RECORD OF PERSONAL INFORMATION ((in terms Section 24(1) of the Protection of Personal Information Act, 2013 (Act No. 4 of 2013)**

Required for completion: FORM 2 - REQUEST FOR CORRECTION OR DELETION OF PERSONAL INFORMATION OR DESTROYING OR DELETION OF RECORD OF PERSONAL INFORMATION available at <https://inforegulator.org.za/wp-content/uploads/2020/07/FORM-2-REQUEST-FOR-CORRECTION-OR-DELETION-OF-PERSONAL-INFORMATION-OR.pdf>

- **FEES PAYABLE**

Outcome of request and of fees payable [Regulation 8] available at [Form-3-PAIA.pdf](#)