Group PAIA Manual

Subsidiaries of The Kin Group (Pty) Ltd | Version V3_2026

Document	Group PAIA Manual
Version	V3_2026
Supersedes	PAIA Manuals of the individual Group Companies, including PAIA Manual V2_2024
Applies to	MHA Management Holdings, NHB Administrators, Zazu Life, Fore Financial Services and WISH Fulfilment
Compiled in terms of	Section 51 of the Promotion of Access to Information Act No. 2 of 2000, read with the Regulations Relating to the Promotion of Access to Information, 2021
Owner	Head of Risk, Legal & Compliance
Approved by	Board of Directors, signed by the Chief Executive Officer on its behalf
Effective Date	8 October 2026
Review Frequency	Annually, and whenever the information in this Manual changes

APPROVAL

This Manual is approved by the Board of Directors for the subsidiaries of The Kin Group (Pty) Ltd to which it applies, and is signed by the Chief Executive Officer on behalf of the Board and by the Head of Risk, Legal & Compliance.

	Chief Executive Officer, on behalf of the Board	Head of Risk, Legal & Compliance
Name	Antonio de Freitas	Stephan Groenewald
Signature		
Date	8 October 2026	8 October 2026

1. INTRODUCTION AND PURPOSE

1.1 The Promotion of Access to Information Act No. 2 of 2000 ("PAIA") gives effect to the constitutional right of access to any information held by another person that is required for the exercise or protection of any rights. Section 51 of PAIA requires every private body to compile a manual that explains how this right may be exercised in relation to its records.

1.2 This Manual is the PAIA manual of each Group Company listed in clause 2. It sets out:

(a) the contact details of the Information Officer and Deputy Information Officer of each Group Company;

(b) how to obtain the Guide published by the Information Regulator ("the Regulator");

(c) the categories of records held, and the records that are available without a formal request;

(d) the records held in terms of other legislation;

(e) the procedure and fees for requesting access to a record; and

(f) the information on the processing of personal information required by section 51(1)(c) of PAIA, as inserted by the Protection of Personal Information Act No. 4 of 2013 ("POPIA").

2. GROUP COMPANIES AND CONTACT DETAILS

2.1 This Manual applies to the following subsidiaries of The Kin Group (Pty) Ltd, each of which is a private body for purposes of PAIA (each a "Group Company" and together "the Group"):

Group Company	Registration Number	FSP Number	Business
MHA Management Holdings (Pty) Ltd	1996/011241/07	10134	Financial services
NHB Administrators (Pty) Ltd	2017/513758/07	11314	Financial services
Zazu Life (Pty) Ltd	2017/516074/07	5070	Financial services
Fore Financial Services (Pty) Ltd	2024/753986/07	55301	Financial services
WISH Fulfilment (Pty) Ltd	2024/098721/07	Not an FSP	Fulfilment and support services

2.2 WISH Fulfilment (Pty) Ltd is not an authorised financial services provider and does not render financial services.

2.3 The Kin Group (Pty) Ltd is the holding company of the Group Companies. It is not a Group Company for purposes of this Manual, and this Manual does not apply to it.

2.4 The Group Companies share the following contact details:

Street address	8 Bedford Road, St Andrews, Bedfordview, 2007
Postal address	PO Box 1490, Highlands North, 2037
Telephone	011 887 9582
Email for requests	informationofficer@nhb.co.za

2.5 The Information Officer of each Group Company is its head or the person duly authorised by the head. The Information Officers, and the Deputy Information Officers where designated, registered with the Regulator are:

Group Company	Information Officer	Deputy Information Officer
MHA Management Holdings (Pty) Ltd	Stephan Groenewald	—
NHB Administrators (Pty) Ltd	Stephan Groenewald	—
Zazu Life (Pty) Ltd	Stephan Groenewald	—
Fore Financial Services (Pty) Ltd	Antonio de Freitas	Stephan Groenewald
WISH Fulfilment (Pty) Ltd	Antonio de Freitas	Stephan Groenewald

2.6 All requests should be addressed to the Deputy Information Officer, or, where none is designated, the Information Officer, at the address and email above.

3. GUIDE ON HOW TO USE PAIA

3.1 The Regulator has, in terms of section 10 of PAIA, updated and made available a Guide on how to use PAIA ("the Guide"). The Guide is available in each of the official languages and in braille, and describes, among other things:

(a) the objects of PAIA and POPIA;

(b) the contact details of Information Officers and Deputy Information Officers;

(c) the manner and form of a request for access to a record;

(d) the assistance available from the Regulator;

(e) the remedies available, including complaints to the Regulator and applications to court; and

(f) the fees payable in relation to requests for access.

3.2 The Guide may be inspected or copied at the offices of the Group during normal working hours, and obtained from the Regulator's website at www.inforegulator.org.za, or from the Regulator at:

Physical address	Woodmead North Office Park, 54 Maxwell Drive, Woodmead, Johannesburg, 2191
Postal address	P.O. Box 31533, Braamfontein, Johannesburg, 2017
Telephone	010 023 5200
General enquiries	enquiries@inforegulator.org.za
PAIA complaints	PAIAComplaints@inforegulator.org.za
Website	www.inforegulator.org.za

4. RECORDS AVAILABLE WITHOUT A REQUEST

4.1 No notice has been published in terms of section 52(2) of PAIA. The records marked "Freely available" in clause 6 may nevertheless be obtained from the Group's websites or from the Deputy Information Officer, without a formal request or fee, other than the cost of copying where a printed copy is requested.

5. RECORDS HELD IN TERMS OF OTHER LEGISLATION

5.1 The Group Companies hold records in terms of the following legislation, to the extent applicable to each Group Company. Records held in terms of this legislation may be available in terms of that legislation or, where applicable, on request in terms of PAIA:

Basic Conditions of Employment Act No. 75 of 1997	Income Tax Act No. 58 of 1962
Broad-Based Black Economic Empowerment Act No. 53 of 2003	Insurance Act No. 18 of 2017
Companies Act No. 71 of 2008	Labour Relations Act No. 66 of 1995
Compensation for Occupational Injuries and Diseases Act No. 130 of 1993	Long-term Insurance Act No. 52 of 1998
Consumer Protection Act No. 68 of 2008	Occupational Health and Safety Act No. 85 of 1993

Cybercrimes Act No. 19 of 2020	Prevention and Combating of Corrupt Activities Act No. 12 of 2004
Electronic Communications and Transactions Act No. 25 of 2002	Promotion of Access to Information Act No. 2 of 2000
Employment Equity Act No. 55 of 1998	Protection of Personal Information Act No. 4 of 2013
Financial Advisory and Intermediary Services Act No. 37 of 2002	Skills Development Act No. 97 of 1998
Financial Intelligence Centre Act No. 38 of 2001	Tax Administration Act No. 28 of 2011
Financial Sector Regulation Act No. 9 of 2017	Unemployment Insurance Act No. 63 of 2001
Value-Added Tax Act No. 89 of 1991	

6. CATEGORIES OF RECORDS HELD

6.1 The Group Companies hold the following categories of records. Records marked "Request" may only be accessed by a request in accordance with clause 7, and access remains subject to the grounds of refusal in clause 8.

Category	Records	Availability
Public information	Product information, brochures, privacy notice, complaints procedure, conflict of interest policy summary, website content, media releases	Freely available
Licences and regulatory	FSP licences and conditions, regulatory registrations, correspondence with the FSCA, FIC, Information Regulator and other authorities, compliance reports	FSP licence details freely available; other records on request
Corporate and governance	Memorandum of Incorporation, CIPC records, securities registers, board and committee minutes and resolutions, policies and frameworks	Request
Clients and policies	Applications, policy records, beneficiary nominations, premium and collection records, call recordings, correspondence	Request
Claims and complaints	Claim files and supporting documents, claims registers, complaints files and registers, Ombud correspondence	Request
Anti-money laundering	Customer due diligence records, Risk Management and Compliance Programme, sanctions screening records	Request
Human resources	Employment contracts, personnel files, payroll and tax records, leave, training, disciplinary and employment equity records	Request

Category	Records	Availability
Financial	Financial statements, accounting records, tax records, bank statements, asset registers	Request
Suppliers and third parties	Supplier, operator, product supplier and service agreements, and related correspondence	Request
Information technology	IT policies, system documentation, access and security logs	Request

7. PROCEDURE FOR REQUESTING ACCESS

7.1 **Form of request.** A request for access must be made on Form 2 of the Regulations Relating to the Promotion of Access to Information, 2021 ("the PAIA Regulations"), which is available from the Regulator's website and from the Deputy Information Officer, and submitted to the Deputy Information Officer by email, by post or by hand.

7.2 The requester must:

(a) provide sufficient particulars to enable the record and the requester to be identified;

(b) indicate the form of access required and the preferred language;

(c) provide a postal address or email address in the Republic;

(d) identify the right that the requester seeks to exercise or protect, and explain why the record is required for that purpose;

(e) indicate if the requester wishes to be informed of the decision in any other manner, and provide the necessary particulars; and

(f) where the request is made on behalf of another person, provide proof of the capacity in which it is made.

7.3 A requester who is unable to read or write, or who has a disability, may make the request orally, and the Deputy Information Officer will complete the form on the requester's behalf and provide a copy.

7.4 **Fees.** A requester, other than a personal requester, must pay the request fee before the request is processed. If the search for and preparation of the record will take more than six hours, the requester will be required to pay a deposit of one third of the access fee. The access fee is payable before access is given. The fees are set out in clause 10. The requester will be notified of any fee payable on Form 3 of the PAIA Regulations.

7.5 **Decision.** The Information Officer or Deputy Information Officer will decide on the request as soon as reasonably possible, and in any event within 30 days after the request is received in the prescribed form. This period may be extended once, by not more than 30 days, where the request is for a large number of records, requires a search of records held elsewhere, or requires consultation, and the requester will be notified of the extension and the reasons for it. Failure to decide within the period is regarded as a refusal of the request.

7.6 **Third parties.** Where a request is for a record that may contain personal, commercial or confidential information of a third party, the third party will be notified within 21 days of the request and given 21 days to make representations or consent to the disclosure. The requester and the third party will be notified of the decision, and where access is granted despite the third party's objection, access will only be given after 30 days, to allow the third party to lodge a complaint or apply to court.

7.7 **Outcome.** If access is granted, the notice will state the access fee and the form of access. If access is refused, the notice will give adequate reasons, without reference to the content of the record, and will inform the requester of the right to lodge a complaint with the Regulator or apply to court. Where a record cannot be found or does not exist, the head will notify the requester by affidavit or affirmation, giving a full account of the steps taken to find it.

7.8 **Personal information.** A data subject may request confirmation, free of charge, of whether a Group Company holds personal information about him or her, and may request correction, deletion or destruction of that information, in accordance with POPIA and the Group Protection of Personal Information Policy. Requests for a record of personal information are dealt with in accordance with this Manual.

8. GROUNDS FOR REFUSAL

8.1 Access to a record must or may be refused on the grounds set out in Chapter 4 of Part 3 of PAIA, which include where access would involve:

(a) the unreasonable disclosure of personal information about a third party, including a deceased individual;

(b) the disclosure of trade secrets or financial, commercial, scientific or technical information of a third party or of a Group Company, the disclosure of which would be likely to cause harm to its commercial or financial interests;

(c) the disclosure of information supplied in confidence by a third party, or a breach of a duty of confidence owed to a third party in terms of an agreement;

(d) a risk to the life or physical safety of an individual, or to the security of property, buildings, systems or communication systems;

(e) the disclosure of records privileged from production in legal proceedings, unless the privilege has been waived; or

(f) the disclosure of research information of a third party or a Group Company, where disclosure would expose it to serious disadvantage.

8.2 Despite any ground of refusal, access must be granted where disclosure would reveal evidence of a substantial contravention of, or failure to comply with, the law, or an imminent and serious public safety or environmental risk, and the public interest in disclosure clearly outweighs the harm contemplated. Any part of a record that does not contain information that may be refused, and can reasonably be severed, will be disclosed.

9. REMEDIES

9.1 The Group Companies do not have internal appeal procedures. A requester or third party who is dissatisfied with a decision of the Information Officer, including a decision on fees, the form of access, an extension or a refusal, may within 180 days of being notified of the decision:

(a) lodge a complaint with the Regulator in the prescribed form; or

(b) apply to a court with appropriate jurisdiction for relief.

10. PRESCRIBED FEES

10.1 The following fees are payable in terms of the PAIA Regulations. A personal requester does not pay the request fee. All fees include VAT.

No.	Description	Fee
1	Request fee payable by a requester, other than a personal requester	R140.00
2	Photocopy or printed black and white copy of an A4-size page	R2.00 per page
3	Printed copy of an A4-size page	R2.00 per page
4	Copy in a computer-readable form on a flash drive (to be provided by the requester)	R40.00
5	Copy in a computer-readable form on a compact disc, if provided by the requester / if provided to the requester	R40.00 / R60.00
6	Transcription of visual images, per A4-size page; copy of visual images	As quoted by service provider

No.	Description	Fee
7	Transcription of an audio record, per A4-size page	R24.00
8	Copy of an audio record on a flash drive (to be provided by the requester), or on a compact disc if provided by / to the requester	R40.00 / R40.00 / R60.00
9	Search for and preparation of the record, for each hour or part of an hour excluding the first hour	R145.00 per hour, to a maximum of R435.00
10	Deposit where the search exceeds six hours	One third of the access fee
11	Postage, email or other electronic transfer	Actual expense, if any

11. PROCESSING OF PERSONAL INFORMATION

11.1 **Purposes of processing.** The Group Companies process personal information to provide advice, intermediary, administration and claims services in respect of insurance products; to verify identity and comply with anti-money laundering, tax and other legal obligations; to prevent fraud; to handle complaints and requests; to manage employment relationships; to manage supplier relationships; to market their products and services where permitted; and for statistical and actuarial analysis. Further detail is set out in the Group Privacy Notice.

11.2 **Categories of data subjects and personal information:**

Data subjects	Personal information processed
Prospective clients, policyholders, insured lives, beneficiaries and claimants	Identity and contact details, date of birth, banking details, employment details, policy, premium and claims information, health information required for claims, call recordings and correspondence
Members of group schemes, employers and trade unions	Member schedules, contribution and deduction records, contact details of representatives
Employees and job applicants	Identity and contact details, qualifications, employment history, remuneration, banking and tax details, leave, performance and disciplinary records, race and disability for employment equity, health information for leave and incapacity, criminal and credit checks
Representatives and intermediaries	Identity and contact details, qualifications, fit and proper records, CPD and debarment records
Suppliers, product suppliers and service providers	Company details, directors and contact persons, banking details, B-BBEE status, agreements

11.3 **Recipients.** Personal information may be shared, where lawful, with other Group Companies, product suppliers and their reinsurers, operators such as IT, cloud, call

centre, payment and collection providers, medical practitioners and assessors, auditors and professional advisers, the FSCA, the Prudential Authority, the Financial Intelligence Centre, the South African Revenue Service, the Regulator, the Ombud schemes and courts.

11.4 **Transborder flows.** Certain cloud hosting and software providers store or process information outside South Africa, including in the United States of America, the European Union, the United Kingdom, the Asia-Pacific region and Australia. Transfers take place only where permitted by section 72 of POPIA.

11.5 **Security measures.** The Group Companies implement appropriate, reasonable technical and organisational measures in terms of section 19 of POPIA and the Group IT Governance, Cybersecurity and Data Risk Policy, including role-based access control, multi-factor authentication, firewalls and network segmentation, encryption, endpoint protection, audit logging, secure remote access, replicated systems and backups, staff training and confidentiality obligations, and contractual security obligations on operators.

12. AVAILABILITY AND REVIEW OF THIS MANUAL

12.1 This Manual is available on the websites of the Group Companies, and for inspection at 8 Bedford Road, St Andrews, Bedfordview during normal working hours. A copy will be provided to any person on payment of the copying fee in clause 10, and to the Regulator on request.

12.2 This Manual is reviewed annually and updated whenever the information in it changes, including any change in the Information Officers or Deputy Information Officers.