



GOLDEN ARROW
EMPLOYEES' MEDICAL BENEFIT FUND

**Information Manual
prepared in terms of
section 51 of the
Promotion of Access to
Information Act 2 of
2000 as Amended
(PAIA 31 of 2019)**

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INFORMATION MANUAL FOR GOLDEN ARROW EMPLOYEES' MEDICAL BENEFIT FUND

Prepared in terms of section 51 of the Promotion of Access to Information Act, Act 2 of 2000 as Amended (PAIA 31 of 2019)

1 INTRODUCTION

The Promotion of Access to Information Act, 2000, as amended, ('the Act') gives third parties the right to approach private bodies to request information held by them, which is required in the exercise and/or protection of any rights. On request, the public body is obliged to release such information unless the Act expressly states that the records containing such information may or must not be released. This manual informs requesters of procedural and other requirements which a request must meet as prescribed by the Act, and further incorporates or addresses the requirements of the Protection of Personal Information Act, 2013 ('POPIA').

It is important to note that the Act recognises certain limitations to the right of access to information, including, but not limited to, limitations aimed at the reasonable protection of privacy, commercial confidentiality, and effective, efficient and good governance, and in a manner which balances that right with any other rights, including such rights contained in the Bill of Rights in the Constitution of the Republic of South Africa.

2 LIST OF ACRONYMS, ABBREVIATIONS AND DEFINITIONS

The following definitions apply in relation to the reading of this document:

Name	Definition
CEO	Chief Executive Officer
Data Subject	A data subject is a person to whom Personal Information relates.
DIO	Deputy Information Officer
Golden Arrow Employees' Medical Benefit Fund	Refers to Golden Arrow Employees' Medical Benefit Fund with registration number 1270
IO:	Information Officer means the person that is responsible for discharging the duties and responsibilities assigned to the "head" of the private institution, such as the managing director or any person duly appointed by the managing director.
IR	Information Regulator
Minister	Minister of Justice and Correctional Services
Other Requester	means any person making a request for access to a record.

Name	Definition
PAIA	Promotion of Access to Information Act No. 2 of 2000(as Amended)
Personal Information	According to the POPI Act “Personal Information” means information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person. The POPI Act, which has more specific examples, can be found at the following link: www.gov.za/documents/download.php?f=204368 .
Personal Requester	means any person making a request for access to a record containing personal information about the requester.
POPIA	Protection of Personal Information Act No.4 of 2013
Requester:	means any person making a request for access to a record.
Regulator	Information Regulator
Third Party	means any natural or juristic person other than, the requester, a party that acting on behalf of the requester, or alternatively Golden Arrow Employees’ Medical Benefit Fund itself.

3 PURPOSE OF THIS PAIA MANUAL

The purpose of this manual is to provide assurance to the regulator and the public on the processes at Golden Arrow Employees’ Medical Benefit Fund and its subsidiaries to avail information to requesters, and that Golden Arrow Employees’ Medical Benefit Fund complies with the requirements of both PAIA and POPIA.

The manual is useful for the public to: -

- Understand how to make a request for access to a record held at Golden Arrow Employees’ Medical Benefit Fund.
- Access all the relevant contact details of the persons who will assist the public with records they intend to access.
- Know the remedies available from Golden Arrow Employees’ Medical Benefit Fund regarding request for accessing information before approaching the Information Regulator or Courts.
- A description of the guide on how to use PAIA, as updated by the Regulator and how to obtain access to it.
- If Golden Arrow Employees’ Medical Benefit Fund 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.
- If Golden Arrow Employees’ Medical Benefit Fund has planned to transfer or process personal

information outside the Republic of South Africa, the recipients or categories of recipients to whom the personal information may be supplied.

- Know whether Golden Arrow Employees' Medical Benefit Fund has appropriate security measures to ensure the confidentiality, integrity and availability of the personal information which is to be processed.

It is important to note that the Act recognises certain limitations to the right of access to information, including, but not limited to limitations aimed at the reasonable protection of privacy, commercial confidentiality, and effective, efficient and good governance, and in a manner which balances that right with any other rights, including such rights contained in the Bill of Rights in the Constitution of the Republic of South Africa.

4 KEY CONTACT DETAILS FOR GOLDEN ARROW EMPLOYEES' MEDICAL BENEFIT FUND

4.1 INFORMATION OFFICER

The Golden Arrow Employees' Medical Benefit Fund Board of Directors has authorised the Principal Officer Golden Arrow Employees' Medical Benefit Fund as the Information Officer for Golden Arrow Employees' Medical Benefit Fund.

Name: Ms Mariehette Louwsma

Designation: Golden Arrow Employees' Medical Benefit Fund Principal Officer

Postal Address: Arrowgate Depot
Pallotti Road
Montana Estate
Cape Town
7490

Physical Address: Golden Arrow Employees' Medical Benefit Fund
Arrowgate Depot
Pallotti Road
Montana Estate
Cape Town

7490

Contact Number: +27 21 937 8805

E-mail: gaembfinformationofficer@gabs.co.za

Website <https://www.goldenarrowmed.co.za>

4.2 THE INFORMATION REGULATOR OF SOUTH AFRICA

The Information Regulator is required in terms of the Act to compile a guide in every official language, in an easily comprehensible form and manner, as may be required by a person who wishes to exercise any right contemplated in the Act.

Any enquiries regarding this guide should be directed to:

Postal Address: The Information Regulator (South Africa)

PO Box 31533

Braamfontein

2017

Telephone Number: +27 10 023 5200

Email Addresses

General enquiries: enquiries@inforegulator.org.za

Complaints: paiacomplaints@inforegulator.org.za

5 APPLICABILITY TO GOLDEN ARROW EMPLOYEES' MEDICAL BENEFIT FUND

Golden Arrow Employees' Medical Benefit Fund falls within the definition of a **private body**; therefore, the sections pertaining to private bodies will be applicable. Golden Arrow Employees' Medical Benefit Fund is a statutory body, established in terms of the Medical Schemes Act of 1998. Access to the records of all beneficiaries of the Fund may be requested from the registered Information Officer.

6 AVAILABILITY OF THIS MANUAL

This manual is available in English at:

- Golden Arrow Employees' Medical Benefit Fund's physical address

- Website
- On request from the Information Officer

7 GENERAL SUBJECTS AND CATEGORIES ON WHICH RECORDS ARE HELD AT GOLDEN ARROW EMPLOYEES' MEDICAL BENEFIT FUND

NOTE: Golden Arrow Employees' Medical Benefit Fund does not provide information on categories of records which are available without a person having to request access and/or are automatically available.

Products and Services	
Medical Scheme	Management of restricted medical scheme
Fund Records	
Finance and supporting documentation	Management Accounts & Annual Financial Statements
Actuarial	Performance Analysis & Forecasts
Managed Care	Management of provider arrangements
Administration & other service suppliers	Supplier reporting
Subjects on which records are held	
Principal Members	
Dependants	
Trustees & Fund Officials	
The following records are held in respect of the abovementioned subjects	
Confidential	Contact details
Personal	ID & CV

7.1 THE ACCESSIBILITY OF THE DOCUMENTS LISTED BELOW MAY BE SUBJECT TO THE GROUNDS OF REFUSAL SET OUT IN THIS MANUAL

7.1.1 Beneficiary Records:

'Beneficiary' refers to any person who is registered as a beneficiary on Golden Arrow Employees' Medical Benefit Fund with or without a termination date, and utilizes benefits and services offered by the Fund and includes, without limitation, members, dependants (spouse, common-law / fiancé, child, stepchild, parent, grandchild, adopted child, sister, brother, grandparents, niece, nephew).

Beneficiary Records may include the following:

- Personal records provided by the members;
- Records provided by a third party relating to the beneficiary;
- Conditions of membership;
- Correspondence relating to beneficiary records.

7.1.2 Participating Employer Records

A 'participating employer' refers to any natural or juristic entity that participates in Golden Arrow Employees' Medical Benefit Fund.

Participating Employer Records may include the following:

- Records provided by Golden Arrow Employees' Medical Benefit Fund to an intermediary;
- Records generated by or within Golden Arrow Employees' Medical Benefit Fund relating to participating employers, including transactional records.

7.1.3 Finance

- Financial records
- Actuarial records

7.1.4 Client Care

- Membership documents
- Applications
- Personal detail amendments
- Financial transactions
- Changes beneficiaries

- General information

7.1.5 Alternate

- Benefit Option records
- Operational records
- Information technology
- Member specific correspondence
- Regulatory-related records
- Rules of the Fund
- Records held by Golden Arrow Employees' Medical Benefit Fund

7.2 THESE RECORDS INCLUDE BUT ARE NOT LIMITED TO THE RECORDS WHICH PERTAIN TO GOLDEN ARROW EMPLOYEES' MEDICAL BENEFIT FUND' S OWN AFFAIRS.

7.2.1 Other Records

Further records are held pertaining to:

- Trustees
- Committee members
- Employers
- Officials
- Intermediaries
- Service Providers

8 RECORDS AVAILABLE IN ACCORDANCE WITH OTHER LEGISLATION

A requester may also request information that is available in terms of other legislation. Medical Schemes Act 131 of 1998

- Protection of Personal Information Act of 2013
- The Promotion of Access to Information Act of 2000

Category of Records	Applicable Legislation
Memorandum of incorporation	Companies Act 71 of 2008

PAIA Manual	Promotion of Access to Information Act 2 of 2000
Employment contracts and related documents	Basic Conditions of Employment Act 75 of 1997
Electronic transactions and digital records	Electronic Communications and Transactions Act 25 of 2002
Proof of payments of levies	Council for Medical Schemes Levies Act 58 of 2000
Privacy policy	Protection of Personal Information Act 4 of 2013

A list of legislation and records related to legislation is available under Annexure A of the Manual.

9 CATEGORIES OF DATA SUBJECTS ON WHICH GOLDEN ARROW EMPLOYEES' MEDICAL BENEFIT FUND HOLD RECORDS (REFER ANNEXURE A)

Category of data subject	Categories of information and records*
Employees of Golden Arrow Employees' Medical Benefit Fund	Name, ID number, physical address, health information, disability information, employee benefit information, bank details, tax number, letter of appointment, vehicle registration information, performance records, payslips, training records, CV, records of qualifications, psychometric assessment results, credit check results, criminal record check results, CCTV footage, next of kin information, beneficiary information, sexual health, sexual orientation, trade union membership, religious or philosophical beliefs, biometric information (photos)
Clients of Golden Arrow Employees' Medical Benefit Fund	Name, ID or registration number, address, financial information, credit check results, health information, application form, policy documents, VAT number, tax number, tax certificates, CCTV footage, biometric information (photos), call recordings, vehicle, and driver registration information, payment records, geo-location, policy information, contact person information if the client is a juristic person.
Business partners that Golden Arrow Employees' Medical Benefit Fund partner with for delivering certain products	Name, registration number, contact details, cashbacks, CCTV footage
Third parties with whom Golden Arrow Employees' Medical Benefit Fund conduct business services with	Name, registration number, financial information, contract details, CCTV footage

Category of data subject	Categories of information and records*
Contractors at Golden Arrow Employees' Medical Benefit Fund	Name, surname, physical address, registration number, financial information, contract, contractor name, ID number of contractors, CCTV footage, vehicle and driver registration information, biometric information (photos)
Suppliers and Vendors of Golden Arrow Employees' Medical Benefit Fund	Name, registration number, financial information, contract, tender documents, CCTV footage

10 CATEGORIES OF DATA SUBJECTS, THE INFORMATION RELATION TO DATA SUBJECTS, AND PURPOSES THAT GOLDEN ARROW EMPLOYEES' MEDICAL BENEFIT FUND PROCESSES PERSONAL INFORMATION

In terms of POPIA, data may only be processed for a specific purpose. Golden Arrow Employees' Medical Benefit Fund has various products and services and the reason for processing data differs will depend and differ based on the nature of the data that is collected, the data subject and the specific product and or service applicable. The purpose is disclosed either explicitly or implicitly when the data is collected. The Golden Arrow Employees' Medical Benefit Fund Privacy Policy elaborates on how data is collected in Golden Arrow Employees' Medical Benefit Fund.

Below follows the categories of Data Subjects, the information held relating to Data Subjects, and purposes that Golden Arrow Employees' Medical Benefit Fund processes Personal Information.

10.1 PURPOSE/REASONS FOR PROCESSING PERSONAL INFORMATION

Client data is collected at various collection points as part of engagements with clients and provides Golden Arrow Employees' Medical Benefit Fund the ability to provide products and services to our clients. By means of example, the data may be collected as part of an application process, during a claims process in assessing a client's financial needs, in administering a client's health plan, assessing a client's risk profile or investment needs or for research purposes. Golden Arrow Employees' Medical Benefit Fund may also acquire data about our clients from third parties and process the data provided from credit bureaus or other industry bodies, a client's employer, health care providers or other providers to*:

- conduct underwriting
- perform a risk assessment on a client
- consider claims

- provide financial advice
- process medical expenses/claim on behalf of a medical scheme
- process a product/service application
- conduct research

***Note: the list above may not be an exhaustive list.**

10.2 EMPLOYEE PERSONAL INFORMATION

Golden Arrow Employees' Medical Benefit Fund processes employee data for business administration purposes, such as payroll purposes. Employee data is also processed to the extent required by legislation. For example, the disclosure of employee's financial information to the Commissioner for the South African Revenue Services (SARS) in terms of the Income Tax Act 58 of 1962 and employees' special personal information in terms of the Employment Equity Act 55 of 1998.

10.3 GOLDEN ARROW EMPLOYEES' MEDICAL BENEFIT FUND COMPANY DATA

These records include, but are not limited to, the records that pertain to Golden Arrow Employees' Medical Benefit Fund's own affairs. These include the following:

- Financial records and reports
- Operational Records
- Communication
- Product and services records
- Administrative records (E.g., Legal Agreements, contracts, service-level agreements)
- Information Technology
- Statutory records and reports
- Internal policies, procedures, and standards
- Human Resources data and records
- Company Intellectual Property

10.4 THIRD PARTY AND EXTERNAL RECORDS

These records include data acquired either in the public domain or from third party providers directly and include but may not be an exhaustive list, to be able to process payments or perform functions

on Golden Arrow Employees' Medical Benefit Fund's behalf, because of an outsourced service or as part that is provided by the third party.

In performing these tasks Golden Arrow Employees' Medical Benefit Fund may process, collect, store, collate or disclose personal or special personal information. This may include the following information:

- Employee, client (being juristic or non-juristic entities) or private body records that are held by external third parties, other than subsidiaries of the Golden Arrow Employees' Medical Benefit Fund.
- Financial records, correspondence, contractual records, payment records, records provided by other parties or records that third parties provided to Golden Arrow Employees' Medical Benefit Fund or its subsidiaries that are held within the Golden Arrow Employees' Medical Benefit Fund that may pertain to other parties.
- Golden Arrow Employees' Medical Benefit Fund may keep records pertaining to other parties, including contractors, suppliers' subsidiaries, holdings, joint-venture entities, service providers or entities that Golden Arrow Employees' Medical Benefit Fund may have a shareholding in.

11 RECEIPTS TO WHOM PERSONAL INFORMATION MAY BE SUPPLIED TO

A requester is any party who request access to a record that is held by Golden Arrow Employees' Medical Benefit Fund. A requester is entitled to request access to their own information or information pertaining to third parties, where the requester has a legitimate interest to protect or is appropriately authorised.

Further to this, and subject to the nature of the information requested, Golden Arrow Employees' Medical Benefit Fund may supply information or records to the following categories of recipients:

- Statutory oversight bodies, regulators or judicial commissions of enquiry making a request for data (such as the National Credit Regulator in terms of the National Credit Act 34 of 2005) – please reference list above for more examples.
- Any court, administrative or judicial forum, arbitration, statutory commission or ombud making a request for data held by Golden Arrow Employees' Medical Benefit Fund in terms of the applicable rules (such as the Competition Commission of the Competition Act 89 of 1998)
- The South African Revenue Service, or another similar authority.

- The Department of Labour, or other similar authority.
- A contracted third party who requires the information to provide healthcare services to a member or their dependents on their health plan.
- Anyone making a successful application for access in terms of PAIA
- Auditing and accounting bodies (both internal and external)
- Research or academic institutions (where applicable)
- Information regarding a data subject's creditworthiness with any credit bureau or credit provider, industry association or other association where Golden Arrow Employees' Medical Benefit Fund operates in, provided it is in line with the provisions in POPIA, the relevant POPIA codes of conduct and the National Credit Act 34 of 2005.

12 TRANSBORDER FLOWS OF PERSONAL INFORMATION

Golden Arrow Employees' Medical Benefit Fund may transfer personal information to third parties who are outside the borders of South Africa. When transferring the data to alternative jurisdiction's, it is done for certain products or services. Personal Information may also be stored (processed) in the cloud or on data servers that are located outside the borders of South Africa. Golden Arrow Employees' Medical Benefit Fund will only do so in line with the provisions set out in POPIA and after a full assessment has been performed on the provider and the country has been fully assessed, with sufficient security safeguards and measures in place.

13 MEASURES IMPLEMENTED BY THE RESPONSIBLE PARTY TO ENSURE THE CONFIDENTIALITY, INTEGRITY, AND AVAILABILITY OF THE INFORMATION TO BE PROCESSED

13.1 INFORMATION SECURITY

The confidentiality and protection of client's data is a high priority for Golden Arrow Employees' Medical Benefit Fund. Information Security deals with Golden Arrow Employees' Medical Benefit Fund's Information, IT and Cyber security capability and practices.

Information security is implemented in Golden Arrow Employees' Medical Benefit Fund through robust, repeatable, and tested processes with will define responsibilities and controls in place. Policies, Standards controls, roles and responsibility, reporting structures and escalation structures

have been put in place with reporting structures to ensure that the structure is consistently evaluated and reported on

13.2 SPECIFIC MEASURES IMPLEMENTED BY GOLDEN ARROW EMPLOYEES' MEDICAL BENEFIT FUND TO ENSURE INFORMATION SECURITY

Please note that the below, is not an exhaustive list of measures that are implemented.

- Firewall protection, malware protection, network encryption and virus protection are in place.
- Ransomware protections are in place.
- Laptop and mobile Data encryption is in place.
- Computer and laptop portal blocking is in place.
- Lock boxes for hard copy data storage are in place.
- Secure hard copy disposable facilities with shredding infrastructure are in place.
- Secure processes for secure back up of data are in place.
- Golden Arrow Employees' Medical Benefit Fund enforce strong passwords and two-tier authentication processes.
- Anti-phishing and anti-spam software are in place.
- A clean desk policy is enforced.
- Wi-Fi security is in place.
- Network and data access control through a managed active directory is in place.
- A managed disposal of data no longer needed is in place.
- A managed disposal of old IT equipment is in place.

14 ACCESSING RECORDS HELD BY GOLDEN ARROW EMPLOYEES' MEDICAL BENEFIT FUND

Records held by Golden Arrow Employees' Medical Benefit Fund will be accessed only once the prerequisite requirements for access have been met by a requester. A requester is any person making a request for access to a record of or held by Golden Arrow Employees' Medical Benefit Fund. There are two types of requesters:

14.1 PERSONAL REQUESTER

A personal requester is a requester who is seeking access to a record containing personal information about the requester.

Golden Arrow Employees' Medical Benefit Fund will voluntarily provide the requested information or give access to any record regarding the requester's personal information. The prescribed fee for reproduction of the information requested could be charged.

14.2 OTHER REQUESTER

This requester (other than a personal requester) is entitled to request access to information on third parties. However, Golden Arrow Employees' Medical Benefit Fund is not obliged to voluntarily grant access. The requester must fulfil the prerequisite requirements for access in terms of the Act, including the payment of a request and access fee.

15 REQUEST PROCEDURE FOR ACCESSING RECORDS

A requester requiring access to information held by Golden Arrow Employees' Medical Benefit Fund must complete the prescribed Form 2 published on the Fund's website.

Submit the completed form to the Information Officer at the postal or physical address, fax number or electronic mail address recorded in paragraph 2 of this manual and pay a request fee and a deposit, where so advised.

The prescribed form must be completed with enough particularity to at least enable the Information Officer to identify:

- The record or records requested;
- The identity number of the requester;
- The form of access required, if the request is granted;
- The e-mail, postal address, or fax number of the requester.

If a request is made on behalf of another person, then the requester must submit proof of the capacity in which the requester is making the request to the reasonable satisfaction of the Information Officer.

The requester must state that he/she requires the information in order to exercise or protect a right, and clearly state what the nature of the right to be exercised or protected. In addition, the requester must clearly specify why the record is necessary to exercise or protect such a right.

Golden Arrow Employees' Medical Benefit Fund will process the request within 30 days, unless the requester has stated special reasons which would satisfy the Information Officer that circumstances dictate that the above time periods could not be complied with.

The requester will be informed in writing whether access has been granted or denied. If, in addition, the requester requires the reasons for the decision in any other manner, he must state the manner and the particulars so required.

If an individual is unable to complete the prescribed form because of illiteracy or disability, such a person may make the request orally to the Information Officer.

Where applicable, the requester must pay the prescribed fee if applicable before any further processing can take place.

16 DECISION ON PROVIDING INFORMATION

Golden Arrow Employees' Medical Benefit Fund will, within 30 days of receipt of the request, decide whether to grant or decline the request and give notice with reasons (if required) to that effect. The 30-day period within which Golden Arrow Employees' Medical Benefit Fund has to decide whether to grant or refuse the request, may be extended for a further period of not more than 30 days if the request is for a large number of information, or the request requires a search for information held at another office of the Fund and the information cannot reasonably be obtained within the original 30-day period. The Information Officer will notify the requester in writing should an extension be sought.

17 GROUNDS FOR REFUSAL OF ACCESS TO RECORDS

The Information Officer may refuse a request for information based on the following:

- 17.1 Mandatory protection of the privacy of a third party who is a natural person, which would involve the unreasonable disclosure of personal information of that natural person;
- 17.2 Mandatory protection of the commercial information of a third party, if the record contains:
 - Trade secrets of that third party;
 - Financial, commercial, scientific or technical information which disclosure could likely cause harm to the financial or commercial interests of that third party; and
 - Information disclosed in confidence by a third party to Golden Arrow Employees' Medical Benefit Fund, if the disclosure could put that third party at a disadvantage in negotiations or commercial competition.

- 17.3 Mandatory protection of confidential information of third parties if it is protected in terms of any agreement or legislation;
- 17.4 Mandatory protection of the safety of individuals and the protection of property;
- 17.5 Mandatory protection of records which would be regarded as privileged in legal proceedings;
- 17.6 The commercial activities of Golden Arrow Employees' Medical Benefit Fund, which may include:
 - 17.6.1 Trade secrets of Golden Arrow Employees' Medical Benefit Fund;
 - 17.6.2 Financial, commercial, scientific or technical information which disclosure could likely cause harm to the financial or commercial interests of Golden Arrow Employees' Medical Benefit Fund;
 - 17.6.3 Information which, if disclosed, could put Golden Arrow Employees' Medical Benefit Fund at a disadvantage in negotiations or commercial competition;
 - 17.6.4 A computer program which is owned by Golden Arrow Employees' Medical Benefit Fund and which is protected by copyright.
- 17.7 The research information of Golden Arrow Employees' Medical Benefit Fund or a third party, if its disclosure would disclose the identity of the institution, the researcher or the subject matter of the research and would place the research at a serious disadvantage;
- 17.8 Requests for information that is clearly frivolous or vexatious, or which involve an unreasonable diversion of resources shall be refused

18 REMEDIES AVAILABLE WHEN GOLDEN ARROW EMPLOYEES' MEDICAL BENEFIT FUND REFUSES A REQUESTOR

18.1 INTERNAL REMEDIES

The requestor may appeal to the Board of Trustees of Golden Arrow Employees' Medical Benefit Fund regarding a decision made by the Information Officer. Such appeal will be heard by the BOT at the next available scheduled BOT Meeting.

Save for the above, Golden Arrow Employees' Medical Benefit Fund does not have any other internal appeal procedures. Therefore, the decision made by the BOT is final. Requesters who are dissatisfied with a decision of the BOT will have to exercise external remedies at their disposal.

18.2 EXTERNAL REMEDIES

A requester or a third party, who is dissatisfied with an Information Officer's refusal to disclose information, or the disclosed information may within 30 days of notification of the decision, apply to the Constitutional Court, the High Court or another court of similar status for relief..

19 FEES

The Act provides for two types of fees, namely:

- A request fee, which will be a standard fee; and
- An access fee will be calculated by taking into account reproduction costs, search and preparation time and cost, as well as postal costs. (A schedule of reproduction fees is available from the Information Officer)
- A fee for providing information in another language, including courier and printing costs (the Scheme holds information English only)

When the request is received by the Information Officer, the officer will by notice require the requester, other than a personal requester, to pay the regulated prescribed request fee (if any) before further processing of the request.

The Information Officer can withhold a record until the requester has paid the fees as indicated.

A requester whose request for access to a record has been granted, must pay an access fee for reproduction, for search, preparation and for any time reasonably required in excess of the prescribed hours to search for and prepare the record(s) for disclosure including making arrangements to make it available in the requested format.

NOTE: Not requesting a fee will be at the discretion of the Information officer.

20 UPDATING OF THE MANUAL

This manual is prepared by the Information officer, Mariehette Louwsma, and will be updated as any changes to relevant legislation, processes, or persons responsible occur.

The current manual has been updated and published in February 2025.

21 ANNEXURE A

Description of the records which are available in accordance with any other legislation.

***Note: The below is not an exhaustive list of legislation and records related to legislation that is available.**

*Legislation	*Available records held at Golden Arrow Employees' Medical Benefit Fund
Basic Conditions of Employment Act 75 of 1997	Employee and contractor contracts, Leave policy, etc.
Collective Investment Schemes Act 45 of 2002	Application forms, withdrawal forms etc. Fund fact sheets
Companies Act 71 of 2008, as Amended	Audited Financial statements
Compensation of Occupational Injuries and Diseases Act 130 of 1993	Workman's compensation application forms Rules
Competition Act 89 of 1998	Golden Arrow Employees' Medical Benefit Fund Internal Policies
Consumer Protection Act 68 of 2008	Golden Arrow Employees' Medical Benefit Fund Application forms, contracts etc advises the public among others, of Golden Arrow Employees' Medical Benefit Fund promoting fair business practices and protecting consumers from unconscionable, unfair, unreasonable, unjust, or improper trade practices and deceptive, misleading, unfair or fraudulent conduct.
Copyright Act 98 of 1978	Reference to trademarks and intellectual property rights as indicated on Golden Arrow Employees' Medical Benefit Fund designs, documents, services et.
Electronic Communications and Transactions Act 25 of 2002	Details of application of electronic transactions, signatures related to Application forms, withdrawal forms etc

Employment Equity Act 55 of 1998	BBEE Certificates, legally required submissions, standards, and applications
Financial Intelligence Centre Act 38 of 2001as Amended	Golden Arrow Employees' Medical Benefit Fund Risk Management and Compliance programmes
Financial Institutions Protection of Funds Act 28 of 2001	Advice documents, Fund Fact sheets to confirm safe custody and administration of funds and trust property by Golden Arrow Employees' Medical Benefit Fund.
Financial Markets Act 19 of 2012	Personal account trading policy: Prohibit insider trading, and other market abuses.
Income Tax Act 58 of 1862 and Value Added Tax Act 89 of 1991	Value Added Tax Registration IRP2/3/5's to employees and investors VAT invoicing

*Legislation	*Available records held at Golden Arrow Employees' Medical Benefit Fund
Labour Relations Act 66 of 1995	Golden Arrow Employees' Medical Benefit Fund Code of Conduct, Golden Arrow Employees' Medical Benefit Fund Grievance and Disciplinary Policy, etc
Long-Term Insurance Act 52 of 1998	Financial Service Provider certificates, Product descriptions, product rules and advice records etc.
Medical Schemes Act 131 of 1998	Applications forms, claim forms, administration rules etc.
National Credit Act 34 of 2005, as Amended	Golden Arrow Employees' Medical Benefit Fund guidance note on application of NCA. Reports to NCA.
Occupational Health and Safety Act 85 of 1993	Training notes and guidance notes to employees to provide for the health and safety of employees at work and for the health and safety of persons.
Pension Funds Act 24 of 1956	Policyholder Protection Rules Pension Fund Regulations

Protection of Personal Information Act 4 of 2013	Golden Arrow Employees' Medical Benefit Fund Privacy Policy, details of Information officers, Deputy Information officers, Appointment certificates, POPIA and PAIA manuals
Short-term Insurance Act 53 of 1998, as Amended	Financial Service Provider certificates, Product descriptions, product rules and advice records etc.
Skills Development Levies Act 9 of 1999	Legally required submissions, standards, and applications
Trade Marks Act 194 of 1993	Reference to trademarks and intellectual property rights as indicated on Golden Arrow Employees' Medical Benefit Fund designs, documents, services and information on registered trademarks held by Golden Arrow Employees' Medical Benefit Fund.
Trust Property Control Act 57 of 1998	Golden Arrow Employees' Medical Benefit Fund Trust trading guidelines, application forms, i.e., services rendered to trust property owners.
Unemployment Insurance Act 63 of 2001	Information on salary deductions, contributions, and applications to Fund

22 PRESCRIBED FORM TO BE COMPLETED BY A REQUESTER

FORM 2 - REQUEST FOR ACCESS TO RECORD

[Regulation 7]

NOTE:

1. Proof of identity must be attached by the requester.
2. If requests made on behalf of another person, proof of such authorisation, must be attached to this form.

TO: The Information Officer

Tel: +27 21 937 8805

Email: mariehettelouwsma@gabs.co.za

Mark with an "X"

Request is made in my own name. Request is made on behalf of another person.

PERSONAL INFORMATION

Full Names:		
Identity Number:		
Capacity in which request is made (when made on behalf of another person):		
Postal Address:		
Physical Address:		
Email Address:		
Contact Numbers:	Tel. (B):	
	Cellular:	
Full names of person on whose behalf request is made (if applicable):		

Identity Number:		
Postal Address:		
Physical Address:		
Email Address:		
Contact Numbers:	Tel. (B):	
	Cellular:	

PARTICULARS OF RECORD REQUESTED

Provide full particulars of the record to which access is requested, including the reference number if that is known to you, to enable the record to be located.

(If the provided space is inadequate, please continue on a separate page and attach it to this form.

All additional pages must be signed.)

Description of record or relevant part of the record:

Reference number, if available:
Any further particulars of record:

TYPE OF RECORD (mark the applicable box with an X)

- 1. Record is in written or printed form.
- 2. Record comprises virtual images (including photographs, slides, video recordings and computer-generated images, sketches, etc.).
- 3. Record consists of recorded words or information which can be reproduced in sound.
- 4. Record is held on a computer or in an electronic format.

FORM OF ACCESS (mark the applicable box with an X)

- 1. Printed copies of the information (including copies of virtual images, transcriptions and information held in electronic form).
- 2. Written or printed transcription of virtual images (including photographs, slides, video recordings, computer generated images and sketches).
- 3. Transcription of a soundtrack (written or printed document).
- 4. Copies of information on a flash drive (including virtual images and soundtracks).
- 5. Copies of information on a compact disk (CD) (including virtual images and soundtracks).
- 6. Copy of record stored on a cloud storage server.

MANNER OF ACCESS (mark the applicable box with an X)

- 1. Personal inspection of information at the registered address of Golden Arrow Employees' Medical Benefit Fund (including listening to recorded words, information which can be reproduced in sound or information held on a computer or in electronic format).
- 2. Postal service to postal address.
- 3. Courier service to street address.
- 4. Email of information (*including soundtracks if possible*).
- 5. Cloud share/ file transfer.

* If you requested a copy or transcription of a record, do you wish for the copy or transcription to be couriered to you?

Yes No

PARTICULARS OF RIGHT TO BE EXERCISED OR PROTECTED

If the provided space is inadequate, please continue on a separate folio and attach it to this Form.
The requester must sign all the additional folios.

Indicate which right is to be exercised or protected:
Explain why the record requested is required for the exercise or protection of the said right:

FEES

- A request for access to a record, other than a record containing personal information about you, will be processed only after a request fee has been paid.
- You will be notified of the amount to be paid as a request fee.

- The fee payable for access to a record depends on the form in which access is required and the time reasonably required to search for and prepare a record.
- If you qualify for exemption of the payment of any fee, please state the reason for exemption.

Reason for exemption from payment of fees:

NOTICE OF DECISION REGARDING REQUEST FOR ACCESS

You will be notified in writing whether your request has been approved/denied. If you wish to be advised in another manner, please specify the manner and provide the necessary particulars to enable compliance with your request.

How would you prefer to be informed of the decision regarding your request for access to the record?

Signed at _____ this _____ day of _____

Signature of requester/person on whose behalf request is made.

FOR OFFICIAL USE

<i>Reference number:</i>	
<i>Request received by:</i> <i>(State Rank, Name and Surname of Information Officer)</i>	
<i>Date received:</i>	
<i>Access fees:</i>	
<i>Deposit (if any):</i>	

Signature of Information Officer

Date

Name and Surname: _____