

SECTION 51 MANUAL FOR
TRIDENT ADVANTAGE CC
Reg No: 2009/005482/23

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Introduction to TRIDENT ADVANTAGE CC

TRIDENT ADVANTAGE CC is a licensed Short Term Insurance Broker. In addition to providing Broking Services, we also provide Risk Management and Consulting Services.

Our services include:

BROKING SERVICES

In the increasing competitive environment businesses find themselves in the 21st Century, the success of any organisation relies on the quality of its products or services and efficiency and reliability of its supply chain. At Trident Advantage CC, we aim to ensure that your business is protected whenever any of these fundamental pillars of your business fall victim to circumstances beyond your control.

We do this by:-

- Providing customised insurance products designed to specifically address the unique requirements of your business;
- Access to niche products which are not readily available in the local market or which require specialist markets;
- Access to offshore markets in all of the major Global Insurance Markets;
- Specialist advice and expertise sourced from leading industry practitioners;
- A holistic approach to risk which include non-insurance products.

RISK MANAGEMENT SERVICES

Risk Management entails more than just risk identification, evaluation and control – it requires a shift in mindset. Trident Advantage CC assists its clients in this process by:-

- Partnering with the Management team in order to implement a successful and sustainable Risk Management Programme;
- Assistance in the implementation and execution of a Risk Management Programme, be it enterprise wide or in specific risk areas;
- Access to unique Risk Management products including Risk Financing;
- Access to specialists Risk Management consultants;

CONSULTING SERVICES

The local insurance industry has experienced a significant dilution in expertise over the past 15 years. Amongst other reasons, the implementation of strict compliance regulation has had the negative effect of forcing many of the senior practitioners into early retirement. This has resulted in many companies in the industry being forced to employ inexperienced or ill-equipped personnel in senior, decision making positions.

Trident Advantage CC has identified this as a major concern affecting customers, brokers and insurers alike. We therefore offer specialist consulting services to not only the industry but also to non-Trident insurance clients who would like an independent evaluation of their insurance products.

At present Trident's services are limited to Marine Insurance products although, we are able to offer access to specialists on non-marine products.

PARTICULARS IN TERMS OF THE SECTION 51 MANUAL

1. Contact details [Section 51(1)(a)]

Registration No: 2009/005482/23

Information officer:

Pieter Venter

pieter@3dent.co.za

General information:

Address: 2nd Floor AON House
109 HERTZOG BOULEVARD
Cape Town
8001

Postal address: P.O. Box 7255
Roggebaai
8012

Telephone: +27 21 802 3333

Fax: +27 86 659 4310

Website: www.3dent.co.za

General enquiries: info@3dent.co.za

2. The section 10 Guide on how to use the Act [Section 51(1)(b)]

The Guide will be available from the South African Human Rights Commission by not later than December 2011. Please direct any queries to:

The South African Human Rights Commission:

PAIA Unit

The Research and Documentation Department

Postal address: Private Bag 2700
Houghton
2041

Telephone: +27 11 484-8300

Fax: +27 11 484-0582

Website: www.sahrc.org.za

E-mail: PAIA@sahrc.org.za

3. Records available in terms of any other legislation [Section 51(1)(d)]

Basic Conditions of Employment No.75 of 1997
 Close Corporations Act No. 69 of 1984
 Compensation for Occupational Injuries and Health Diseases Act No. 130 of 1993
 Income Tax Act No.95 of 1967
 Trade Marks Act No. 194 of 1993
 Copyright Act No. 98 of 1978
 Labour Relations Act No. 66 of 1995
 Occupational Health & Safety Act No.85 of 1993
 Credit Agreement Act No. 75 of 1980
 Debtors Collectors Act No. 114 of 1998
 Insurance Act No. 27 of 1943
 Short term Insurance Act No. 53 of 1998
 Regional Services Councils Act No. 109 of 1985
 Skills Development Levies Act No. 9 of 1999
 Skills Development Act No.97 of 1998
 Unemployment Contributions Act No. 4 of 2002
 Unemployment Insurance Act No. 63 of 2001
 Value Added Tax Act No. 89 of 1991

4. Record classification

The Company has implemented a system in accordance with which all of the Company's information has been classified into categories and access to such information has been established in respect of the classification of the information.

No.	Classification	Classification Access
1	Public Access	Document May be Disclosed
2	Request after commencement of criminal or civil proceedings [s7]	May not be Disclosed
3	Subject to copyright	May be Disclosed
4	Personal information that belongs to the requestor of that information [s61]	Limited Disclosure
5	Unreasonable disclosure of personal information of natural person [s63(1)]	May not be Disclosed
6	Likely to harm the commercial or financial interests of third party [s64(a)(b)]	May not be Disclosed
7	Likely to harm the Company or third party in contract or other negotiations [s64(c)]	May not be Disclosed
8	Would breach a duty of confidence owed to a third party in terms of an Agreement [s65]	May not be Disclosed
9	Likely to compromise the safety of individuals or protection of property [s66]	May not be Disclosed
10	Legally privileged document [s67]	May not be Disclosed
11	Environmental testing/investigation which reveals public safety/environmental risks [s64(2); s68(2)]	May not be Refused
12	Commercial information of Private Body [s68]	May not be Disclosed
13	Likely to prejudice research and development information of the Company or a third party [s69]	May not be Disclosed
14	Disclosure in public interest [s70]	May not be Refused

5. **Access to the records held by the private body in question** [Sections 51(1)(c) and 51(1)(e)]

i. **The latest notice regarding the categories of records of the body, which are available without a person having to request access in terms of this Act in terms of section 52(2)** [Section 51(1)(c)]

N/A

ii. **Records that may be requested. A description of the subjects of the records held by the body and the categories in which these subjects are classed** [Section 51(1)(e)]

Summary of information held

The Company has the following records which are not automatically available as determined in 4 above:

• **Subject Categories**

- Human Resources Employee Records
- Employment Contracts
- Personnel Guidelines, Policies and Procedures
- Operational Information
- Financial Information
- Public Corporate Records
- Client Information
- General Contract Documentation
- Marketing Material
- Company Guidelines, Policies and Procedures
- Trade Marks
- Statutory Records
- General Operational Information
- Communications Internal and external correspondence

iii. **The request procedures**

Form of request:

- The requester must use the prescribed form to make the request for access to a record. This must be made to the head of the private body. This request must be made to the address, fax number or electronic mail address of the body concerned [s 53(1)].
- The requester must provide sufficient detail on the request form to enable the head of the private body to identify the record and the requester. The requester should also indicate which form of access is required. The requester should also indicate if any other manner is to be used to inform the requester and state the necessary particulars to be so informed [s 53(2)(a) and (b) and (c)].
- The requester must identify the right that is sought to be exercised or to be protected and provide an explanation of why the requested record is required for the exercise or protection of that right [s 53(2)(d)].

- If a request is made on behalf of another person, the requester must then submit proof of the capacity in which the requester is making the request to the satisfaction of the head of the private body [s 53(2)(f)].

Fees:

A requester who seeks access to a record containing personal information about that requester is not required to pay the request fee. Every other requester, who is not a personal requester, must pay the required request fee:

- The Information Officer must notify the requester (other than a personal requester) by written notice, to pay the prescribed fee (if any) before the request can be processed [s 54(1)].
- The fee that the requester must pay to a private body is R50. The requester may lodge an application to the court against the tender or payment of the request fee [s 54(3)(b)].
- After the head of the private body has made a decision on the request, the requester must be notified in the required form.
- If the request is granted then a further access fee must be paid for the search, reproduction, preparation and for any time that has exceeded the prescribed hours to search and prepare the record for disclosure [s 54(6)].

6. Other information as may be prescribed [Section 51(1)(f)]

The Minister of Justice and Constitutional Development has not made any regulations in this regard.

7. Availability of the manual [Section 51(3)]

The manual is available for inspection at the offices of TRIDENT ADVANTAGE CC free of charge; and copies are available with the SAHRC and on the website.

FORM C

REQUEST FOR ACCESS TO RECORD OF PRIVATE BODY
(Section 53(1) of the Promotion of Access to Information Act, 2000
(Act No. 2 of 2000)

[Regulation 10]

A. Particulars of private body

The Head:

B. Particulars of person requesting access to the record

- | | |
|-----|---|
| (a) | The particulars of the person who requests access to the record must be given below. |
| (b) | The address and/or fax number in the Republic to which the information is to be sent must be given. |
| (c) | Proof of the capacity in which the request is made, if applicable, must be attached. |

Full names and surname:

Identity number:

Postal address:

Fax number:

Telephone number:

E-mail address:

Capacity in which request is made, when made on behalf of another person:

C. Particulars of person on whose behalf request is made

This section must be completed <i>ONLY</i> if a request <i>for information</i> is made on behalf of <i>another</i> person.
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Full names and surname:

Identity number:

D. Particulars of record

- | | |
|-----|--|
| (a) | 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. |
| (b) | 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. |

1 Description of record or relevant part of the record:

2 Reference number, if available:

3 Any further particulars of record:

E. Fees

- | |
|--|
| <p>(a) A request for access to a record, other <i>than</i> a record containing personal information about yourself, will be processed only after a request fee has been paid.</p> <p>(b) You will be <i>notified of</i> the amount required to be paid as the request fee.</p> <p>(c) The fee payable for access to a record depends <i>on</i> the form <i>in which</i> access is required and the reasonable time <i>required</i> to search for and prepare a record.</p> <p>(d) If you qualify for exemption <i>of</i> the payment <i>of</i> any fee, please state the reason for exemption.</p> |
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Reason for exemption from payment of fees:

F. Form of access to record

<p>If you are prevented by a disability to read, view or listen to the record in the form of access provided for in 1 to 4 hereunder, state your disability and indicate in which form the record is required.</p>
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Disability:	Form in which record is required
<p>Mark the appropriate box with an X.</p> <p>NOTES:</p> <p>(a) Compliance with your request in the specified form may depend on the form in which the record is available.</p> <p>(b) Access in the form requested may be refused in certain circumstances. In such a case you will be informed if access will be granted in another form.</p> <p>(c) The fee payable for access for the record, if any, will be determined partly by the form in which access is requested.</p>	

1. If the record is in written or printed form:

<input type="checkbox"/>	copy of record*	<input type="checkbox"/>	inspection of record
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2. If record consists of visual images

this includes photographs, slides, video recordings, computer-generated images, sketches, etc)

<input type="checkbox"/>	view the images	<input type="checkbox"/>	copy of the images"	<input type="checkbox"/>	transcription of the images*
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3. If record consists of recorded words or information which can be reproduced in sound:

<input type="checkbox"/>	listen to the soundtrack audio cassette	<input type="checkbox"/>	transcription of soundtrack* written or printed document
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4. If record is held on computer or in an electronic or machine-readable form:

<input type="checkbox"/>	printed copy of record*	<input type="checkbox"/>	printed copy of information derived from the record"	<input type="checkbox"/>	copy in computer readable form* (stiffy or compact disc)
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<p>'If you requested a copy or transcription of a record (above), do you wish the copy or transcription to be posted to you? Postage is payable.</p>	YES	NO
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G 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.

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

H. 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 informed 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 of20

SIGNATURE OF REQUESTER / PERSON ON
WHOSE BEHALF REQUEST IS MADE