

## **PAIA MANUAL**

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

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## 1. LIST OF ACRONYMS AND ABBREVIATIONS

- 1.1. “**Milliman**”: Milliman Proprietary Limited
- 1.2. “**PAIA**”: Promotion of Access to Information Act No. 2 of 2000 (as amended); and
- 1.3. “**POPIA**”: Protection of Personal Information Act No. 4 of 2013.

## 2. PURPOSE OF PAIA MANUAL

This PAIA Manual is useful for the public to:

- 2.1. check the categories of records held by Milliman which are available without a person having to submit a formal PAIA request.
- 2.2. Have a sufficient understanding of how to make a request for access to a record of Milliman, by providing a description of the subjects on which it holds records, and the categories of records held on each subject.
- 2.3. Know the description of the records of Milliman which are available in accordance with any other legislation.
- 2.4. Access all the relevant contact details of Milliman’s Information Officer and Deputy Information Officer who will assist the public with the records they intend to access.
- 2.5. Know if Milliman will process personal information, the purpose of processing of personal information and the description of the categories of data subjects and of the information or categories of information relating thereto.
- 2.6. Know the description of the categories of data subjects and of the information or categories of information relating thereto.
- 2.7. Know the recipients or categories of recipients to whom the personal information may be supplied.
- 2.8. Know if Milliman has planned to transfer or process personal information outside the Republic of South Africa and the recipients or categories of recipients to whom the personal information may be supplied; and
- 2.9. Know whether Milliman has appropriate security measures to ensure the confidentiality, integrity and availability of the personal information which is to be processed.

## 3. KEY CONTACT DETAILS FOR ACCESS TO INFORMATION OF MILLIMAN

### 3.1. Chief Information Officer

Name:	David Kirk
Tel:	+27 21 001 2920 (office)
Email:	<a href="mailto:david.kirk@milliman.com">david.kirk@milliman.com</a>

### 3.2. Access to information general contacts

Email: africa@milliman.com

### 3.3. National or Head Office

Postal and Physical Address	21st Floor, Tower South The Towers, Crnr Heerengracht and Hertzog Boulevard, Foreshore, Cape Town 8001, ZA
Telephone:	+27 21 001 2920
Email:	africa@milliman.com
Website:	<a href="https://za.milliman.com/en-gb/">https://za.milliman.com/en-gb/</a>

## 4. GUIDE ON HOW TO USE PAIA AND HOW TO OBTAIN ACCESS TO THE GUIDE

- 4.1. The Information Regulator has, in terms of section 10(1) of PAIA, updated and made available the revised Guide on how to use PAIA ("Guide"), in an easily comprehensible form and manner, as may reasonably be required by a person who wishes to exercise any right contemplated in PAIA and POPIA.
- 4.2. The Guide is available in each of the official languages and in braille.
- 4.3. The aforesaid Guide contains the description of:
  - 4.3.1. The objects of PAIA and POPIA.
  - 4.3.2. The postal and street address, phone and fax number and, if available, electronic mail address of:
    - the Information Officer of every public body, and
    - every Deputy Information Officer of every public and private body designated in terms of section 17(1) of PAIA and section 56 of POPIA.
  - 4.3.3. The manner and form of a request for:
    - access to a record of a public body contemplated in section 11; and
    - access to a record of a private body contemplated in section 5.
  - 4.3.4. The assistance available from the Information Officer of a public body in terms of PAIA and POPIA.
  - 4.3.5. The assistance available from the Regulator in terms of PAIA and POPIA.
  - 4.3.6. All remedies in law available regarding an act or failure to act in respect of a right or duty conferred or imposed by PAIA and POPIA, including the manner of lodging:
    - an internal appeal;
    - a complaint to the Regulator; and
    - an application with a court against a decision by the information officer of a public body, a decision on internal appeal or a decision by the Information Regulator or a decision of the head of a private body.

- 4.3.7. The provisions of sections 14 and 51 requiring a public body and private body, respectively, to compile a manual, and how to obtain access to a manual.
- 4.3.8. The provisions of sections 15 and 52 providing for the voluntary disclosure of categories of records by a public body and private body, respectively.
- 4.3.9. The notices issued in terms of section 22 and 54 regarding fees to be paid in relation to requests for access; and
- 4.3.10. The regulations made in terms of section 92.
- 4.4. Members of the public can inspect or make copies of the Guide from the office of Milliman, including the office of the Information Regulator, during normal working hours.
- 4.5. The Guide can also be obtained:
  - upon request to the Information Officer; and
  - from the website of the Information Regulator (<https://www.justice.gov.za/inforeg/>) or general enquiries e-mail: [inforeg@justice.gov.za](mailto:inforeg@justice.gov.za).
- 4.6. A copy of the Guide is also available in the following two official languages (English and Afrikaans), for inspection during normal office hours –
  - 4.6.1. for the general public, at Milliman's local office in South Africa; and
  - 4.6.2. for Milliman's employees, on the office's SharePoint page.

## **5. CATEGORIES OF RECORDS OF MILLIMAN WHICH ARE AVAILABLE WITHOUT A PERSON HAVING TO REQUEST ACCESS**

- 5.1. No notice has been published in terms of section 52 of PAIA. However, the following records are available at the registered office of Milliman:

Category of records	Types of the Record	Available on Website	Available upon request
Intellectual Property	Copyright and Trademark Information	X	
Privacy records	Privacy Policy and PAIA Manual	X	
Terms of use	Terms and Conditions	X	

## 6. DESCRIPTION OF THE RECORDS OF MILLIMAN WHICH ARE AVAILABLE IN ACCORDANCE WITH ANY OTHER LEGISLATION

- 6.1. Records kept in accordance with other legislation applicable to Milliman include but are not limited to:

Type of Records	Applicable Legislation
Memorandum of incorporation	Companies Act 71 of 2008
PAIA Manual	Promotion of Access to Information Act 2 of 2000
Privacy Policy	Protection of Personal Information Act 4 of 2013
Terms and Conditions of Use of Website	Electronic Communications and Transactions Act 25 of 2002
Employment Contracts	Basic Conditions of Employment Act 75 of 1997
Employment Records	Labour Relations Act 66 of 1995

## 7. SUBJECTS AND CATEGORIES OF RECORDS HELD BY MILLIMAN

Classification No.	Access	Classification
1	May be disclosed	Public Access Document
2	May not be disclosed	Request after commencement of criminal or civil proceedings [Section 7 of PAIA]
3	May be disclosed	Subject to copyright
4	Limited disclosure	Personal Information of natural persons that belongs to the requestor of that information, or personal information of Juristic Persons represented by the requestor of that information [Section 61 of PAIA]
5	May not be disclosed	Unreasonable disclosure of personal information of natural person [Section 63(1)] or Juristic Person [POPIA]
6	May not be disclosed	Likely to harm the commercial or financial interests of third party [Section 64(1)(a) and (b) of PAIA]
7	May not be disclosed	Likely to harm the Company or third party in contract or other negotiations [Section 64(1)(c) of PAIA]
8	May not be disclosed	Would breach a duty of confidence owed to a third party in terms of an agreement [Section 65 of PAIA]
9	May not be disclosed	Likely to compromise the safety of individuals or protection of property [Section 66 of PAIA]
10	May not be disclosed	Legally privileged document [Section 67 of PAIA]
11	May not be refused	Environmental testing / investigation which reveals public safety / environmental risks [Section 64(2); Section 68(2) of PAIA]
12	May not be disclosed	Commercial information of Private Body [Section 68 of PAIA]
13	May not be disclosed	Likely to prejudice research and development information of the Company or a third party [Section 69 of PAIA]
14	May not be refused	Disclosure in public interest [Section 70 of PAIA]

<b>Subject / Departmental Records</b>	<b>Category of Records</b>	<b>Access</b>	<b>.No</b>
Companies Act Records	Memorandum of Incorporation	Available from Companies and Intellectual Property Commission (CIPC) or request in terms of PAIA	1
Human Resources	Employee Records	Request in terms of PAIA	4,5,9 / 10
	Employment contracts	Request in terms of PAIA	4,9
	HR policies and procedures	Request in terms of PAIA	12
	Payroll Records	Request in terms of PAIA	4,5
Services provided to our clients	Policies and Procedures	Request in terms of PAIA	12
Marketing information	Contact details of our clients' representatives and contact person.	Request in terms of PAIA	12,1 3
	Information regarding specific marketing campaigns and events management.		
IT records	Cybersecurity information and measures applied.	Request in terms of PAIA	4,5



	Records on the applied IT-tools.	Request in terms of PAIA	4,5
Legal and compliance records	Contracts	Request in terms of PAIA	6,12

## 8. PROCESSING OF PERSONAL INFORMATION

### 8.1. Purpose of Processing Personal Information

8.1.1. We process personal information for the following purposes, which include but are not limited to:

- providing services to our clients
- maintaining customer records
- resolve complaints or queries
- recruitment purposes
- employment purposes
- business development purposes
- IT security management purposes
- general administration, financial and tax purposes
- black economic empowerment compliance purposes and
- promote and advertise our services to potential or existing customers.

### 8.2. Description of the categories of Data Subjects and of the information or categories of information relating thereto

Categories of Data Subjects	Personal Information that may be processed
Client, Client's' employees or representatives	Name, register number, professional contact details, signature
Service Providers, Service Providers' representatives and contact person	Name, register number and contact details
Employees	Contact and personal details (including but not limited to name, address, marital status), academic records, employment related details (including but not limited to position, salary, working time records, expenses, information about the competition of background checks, performance reviews, absence records, resume), Broad Based Black Economic Empowerment (BBBEE)

	Compliance related information (including but not limited to proof of expenses covered by Milliman for the individual's studies and salaries, as well as their name, job title, race, gender, and job level), insurance data (included but not limited to ID type, gender, income tax number, member category, pensionable salary, member status), login data.
Clients' clients' personal information (for the purpose of rendering services to clients)	No personal information is processed as of the date of the PAIA Manual.

**8.3. The recipients or categories of recipients to whom the personal information may be supplied**

Category of personal information	Recipients or Categories of Recipients to whom the personal information may be supplied
Contact, personal and employment related details	HR service providers and Milliman's Global Corporate Services ("GCS") HR department (Milliman Inc., USA and Milliman India Private Limited)
Payroll and financial information	Local tax advisors and Milliman's GCS Accounting and Finance department (Milliman Inc., USA)
IT related information (such as login information and IP address)	Local IT provider and Milliman's GCS IT department (Milliman Inc., USA and Milliman India Private Limited)
Insurance related information	Insurance providers
Board Based Black Economic Empowerment related information	MSCT BEE Services

**8.3.1. We do not share the personal information of our data subjects with any third parties, except if:**

- we are obliged to provide such information for legal or regulatory purposes such as to respond to subpoenas, court orders, or legal proceedings
- we are selling our business to someone to whom we may transfer our rights under any customer agreement we have with you
- we are involved in the prevention of fraud, loss, bribery or corruption
- they perform services and process personal information on our behalf
- this is within the framework of contractual management by our clients, business partners and service providers

- this is required to provide or manage any information, products and/or services to data subjects; or
- this is required for administrative purposes or for purposes related to the centralisation of Milliman's Global Corporate Services ("GCS") in the US.

#### 8.4. Planned transborder flows of personal information

Category of personal information	Categories of Data Subjects	International Recipients or Categories of Recipients to whom the personal information may be supplied
Accounting and finance information such as payroll registers and salary	Milliman employees	Milliman's GCS Accounting and Finance department (Milliman Inc., USA)
HR information for whistleblowing activities such as identity details, employment identifiers, reports of investigation, general HR information such as employment records and information, criminal and professional background checks information, immigration information and litigation information (where applicable)	Milliman employees	Milliman's GCS HR department (Milliman Inc., USA and Milliman India Private Limited, India) and Milliman's GCS Legal department (Milliman Sàrl, France)
IT related information such as IP addresses, login information, first and last name and e-mail address	Milliman employees  Clients'/Service Providers' representatives using Milliman's e-mail infrastructure	Milliman's GCS IT department (Milliman Inc., USA and Milliman India Private Limited, India)
Information such as name, professional contact details, participation in communities of practice and committees, data related to the use of collaboration sites and content management, and other relevant data based on the employee's resource access needs	Milliman employees	Milliman's GCS Knowledge Management department (Milliman Inc., USA)

Information such as name, email address, practice, location, discipline, attendance to session, feedback on session, enrollment date, completion date	Milliman employees	Milliman's GCS Learning and Development department (Milliman Inc., USA)
Information such as name, comments relating to the negotiation or execution of an agreement and other information related to legal processes	Milliman employees	Milliman's GCS Legal department (Milliman Inc., USA, Milliman India Private Limited, India and Milliman Sàrl, France)
Information such as professional address, company and signature	Clients Clients' employees	Milliman's GCS Legal department (Milliman Inc., USA, Milliman India Private Limited, India and Milliman Sàrl, France)
Information including graduate and post-graduate education (schools, degrees, and dates), professional credentials and experience, employment history and professional and financial achievements	Milliman employees (directors)	Milliman's GCS Legal Governance department (Milliman Inc., USA)
Information such as name, job title and information as to whether mandatory agreements (e.g., Acceptable Use Agreement) were signed	Milliman employees	Milliman's GCS Internal Audits department (Milliman Inc., USA)
Information such as name, contact information, company, session duration on Milliman's website, information shared on Milliman's inquiry boxes on the website	Client Clients' employees Visitors of Milliman's website	Milliman's GCS Marketing and Communications department (Milliman Inc., USA)
Information such as contact details, travel information, dietary requirements, meeting preferences	Milliman employees Clients	Milliman's GCS Meetings department (Milliman Inc., USA)

Information such as accounts payable information including expense type, amount and method of donation	Milliman employees	Milliman's GCS Social Impact and Sustainability department (Milliman Inc., USA)
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**8.5. Information Security Measures to be implemented by Milliman to ensure the confidentiality, integrity and availability of the information.**

Milliman has implemented appropriate, reasonable, technical and organisational measures to keep personal information safe and confidential in accordance with POPIA, as described below:

**8.5.1. Training and awareness initiatives**

Information systems security awareness training is a pillar of Milliman's security policy and Milliman insists on mandatory training for all Milliman's employees. Training is conducted via interactive web-based modules developed by a third-party editor. Modules are organized monthly, and regular monitoring of staff completion is regularly reported to managers. In addition, as part of the new hire process, all new employees must read and approve Milliman's Information Security Policy ("MISP").

**8.5.2. Ability to ensure the ongoing confidentiality, integrity, availability and resilience of processing systems and services**

Milliman has a highly structured program of firm-wide policies and procedures related to the regulatory requirements of the services that Milliman provides. Milliman has implemented controls in accordance with Milliman's Information Security Policy ("MISP"), to ensure the confidentiality, integrity, and availability of client data. MISP controls include (but are not limited to) the following areas of focus:

- Information security awareness
- Identity access management
- Data (including personal information) classification
- Physical and environmental security
- Mobile security
- Disaster recovery / Business continuity
- Anti-virus and malware protection
- Encryption
- Vulnerability management
- Network management
- Privacy and confidentiality

**8.5.3. IT-Account, Management Procedure**

Access to each system component can be granted to a single user, based on the principle of least privilege and minimum necessity. Milliman's employees having access to information at a high-risk level (including clients' personal information) must have a restricted access to information which is necessary for the services provided by them. All employees are bound by professional and contractual confidentiality obligations. Milliman's MISP requires documented authorisation for all access and requires removal of that access at termination. User accounts are created with passwords in accordance with password policy (minimum of 8 characters, complex, enforced change every 90 days). Access to special personal information is strictly controlled and all access

requests must be authorised before being processed. Records of access requests are kept, and access control lists are reviewed on a regular basis.

#### **8.5.4. Ability to restore the availability and access to Personal Information in a timely manner in the event of a physical or technical incident**

Milliman has set up procedures to detect, formalize and centralize any violation of personal information. This procedure is described in Milliman's Incident Response Plan ("IRP"). Milliman has internal incident reporting procedures and specific notification templates to comply with the obligations of POPIA. The reporting procedures involve the CISO (Chief Information Security Officer), CCO (Chief Compliance Officer), CLO (Chief Legal Officer), the Global Data Privacy Director and the Information Officer. Milliman has robust backup and replication processes in place, which includes daily incremental backups, which are replicated to an offsite location. Replication of the critical servers also occurs daily to the Milliman datacenter in Johannesburg, which ensures a quick fail over, should an incident occur.

#### **8.5.5. Business Continuity Plan**

Business continuity and disaster recovery are critical elements of Milliman's organisation strategy to safeguard client information and ensure timely service delivery. Milliman business units have disaster recovery programs. Daily backups are monitored. Milliman's organisation wide area network has multiple points of redundancy to ensure prompt recovery of telecommunications services. This includes but is not limited to a fully meshed network, multiple firewalls configured for high availability and remote access via VPN.

#### **8.5.6. Encryption Measures**

Milliman uses AES 256 standard with AES 128 as a fall back.

#### **8.5.7. Milliman Secure FTP (sFTP) Solution**

Milliman's Secure FTP (SFTP) serves as a proxy and redirects storage of data files into a secure subnet. The SFTP server supports secure file transfer (data in transit) between Milliman and third parties (clients, vendors, etc.). Secure transfer protocols including SFTP, FTPS, and HTTPS are approved delivery protocols supported on the secure FTP server using the AES 256 standard with AES 128 as a fall back.

### **9. HOW TO MAKE A REQUEST FOR ACCESS**

- 9.1. The requester must complete Form 2 (Request for access to record), available on the Information Regulator website (<https://www.justice.gov.za/inforeg/>).
- 9.2. The access request form must contain sufficient information to enable the Information Officer to identify:
  - the records requested
  - proof of identity of the requester
  - form of access required if the request is granted
  - email address, postal address or fax number of the requester in South Africa
  - the right that the requester is seeking to exercise or protect, and provide an explanation of why the requested record is required for the exercise or protection of that right

- if the request is made on behalf of another person, to submit proof of the capacity in which the requester is making the request, to the reasonable satisfaction of the Information Officer; and
  - if the requester wishes to be informed of the decision on the request in any other manner, to state that manner and the necessary particulars.
- 9.3. The form must be submitted together with the request fee, to the Information Officer at the contact details provided in paragraph 3 above.

## **10. PRESCRIBED FEES IN TERMS OF PAIA**

- 10.1. A requestor is required to pay the prescribed fee or R50.00 (fifty Rand) before a request will be processed.
- 10.2. The fee payable for access depends on the form in which access is required and the reasonable time required to search for a prepare a record.
- 10.3. If the preparation of the record requested requires more than the prescribed hours (6), a deposit shall be paid (of not more than one third of the access fee which would be payable if the request were granted).
- 10.4. A requester may lodge an application with a court against the tender / payment of the request fee and/or deposit.
- 10.5. Records may be withheld until the fees have been paid.
- 10.6. The fee structure is available on the website of the Information Regulator (<https://info regulator.org.za>)

## **11. AVAILABILITY OF THE MANUAL**

- 11.1. A copy of the Manual is available –
- on <https://za.milliman.com/en-gb/>
  - head office of Milliman for public inspection during normal business hours
  - to any person upon request and upon the payment of a reasonable prescribed fee; and
  - the Information Regulator upon request.
- 11.2. A fee for a copy of the Manual, as contemplated in annexure B of the Regulations, shall be payable per each A4-size photocopy made.

## **12. UPDATING OF THE MANUAL**

The Information Officer of Milliman will update the Manual on a regular basis.

**Issued by:**  
**David Kirk**  
**Information Officer**

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