



43 Dunrobin Street, Cnr 12th Avenue,  
Sydenham  
T : 011 640 7558  
w : [www.grahamsilva.co.za](http://www.grahamsilva.co.za)  
E : [Info@grahamsilva.co.za](mailto:Info@grahamsilva.co.za)

---

Graham Silva Insurance Consultants CC  
Vehicle, household, business and personal health insurance

# PAIA MANUAL

---

*Prepared in terms of section 51 of the  
Promotion of Access to Information Act, No. 2 of 2000 (as amended)*

## **GRAHAM SILVA INSURANCE CONSULTANTS cc**

Registration No. 1996/022569/23

An Authorised Financial Services Provider — FSP 5671

43 Dunrobin Street, Sydenham, Johannesburg, 2192

Tel: 011 640 7558 | Email: [info@grahamsilva.co.za](mailto:info@grahamsilva.co.za) | [www.grahamsilva.co.za](http://www.grahamsilva.co.za)

Date of compilation: 19 August 2025

Date of latest revision: 19 May 2026

Version 2.0



## Contents

1. List of acronyms and definitions
2. Purpose of this PAIA Manual
3. About Graham Silva Insurance Consultants cc
4. Information Officer — contact details
5. The Regulator's Guide on how to use PAIA
6. Categories of records automatically available
7. Records available under other legislation
8. Subjects on which GSIC holds records
9. Processing of personal information (POPIA)
10. How to request access to a record
11. Fees
12. Grounds on which access may be refused
13. Remedies if access is refused
14. Availability of this Manual
15. Updating of this Manual

Annexure A — Schedule of fees (Annexure B of the PAIA Regulations)

Annexure B — Form 2: Request for access to a record (PAIA)

Annexure C — Form 1: Objection to processing of personal information (POPIA)

Annexure D — Form 2: Request for correction or deletion of personal information (POPIA)



## 1. List of acronyms and definitions

The following acronyms and defined terms are used in this Manual:

Term	Meaning
CC	Close Corporation
DIO	Deputy Information Officer
FAIS	Financial Advisory and Intermediary Services Act, No. 37 of 2002
FICA	Financial Intelligence Centre Act, No. 38 of 2001
FSCA	Financial Sector Conduct Authority
FSP	Financial Services Provider
GSIC / the Company	Graham Silva Insurance Consultants cc
IO	Information Officer
Minister	Minister of Justice and Constitutional Development
PAIA / the Act	Promotion of Access to Information Act, No. 2 of 2000 (as amended)
POPIA	Protection of Personal Information Act, No. 4 of 2013 (as amended)
Regulator	Information Regulator (South Africa)
Republic	Republic of South Africa
SARS	South African Revenue Service



## 2. Purpose of this PAIA Manual

This Manual is published in compliance with section 51 of the Promotion of Access to Information Act, No. 2 of 2000 (as amended) ("PAIA") and addresses the additional requirements introduced by the Protection of Personal Information Act, No. 4 of 2013 ("POPIA").

It is designed to assist any person who wishes to exercise a right of access to records held by Graham Silva Insurance Consultants cc ("GSIC"). Specifically, this Manual enables the public to:

- identify the categories of records held by GSIC which are automatically available without a formal PAIA request;
- understand the subjects on which GSIC holds records and the categories of records held on each subject;
- identify records that are available in terms of other legislation;
- contact the Information Officer responsible for assisting requesters under PAIA and POPIA;
- obtain the Regulator's official Guide on how to use PAIA;
- understand the purposes for which GSIC processes personal information, the categories of data subjects, and the categories of recipients to whom personal information may be supplied;
- know whether GSIC transfers personal information outside the Republic of South Africa; and
- be satisfied that GSIC has implemented appropriate security measures to safeguard personal information.

**Important:** This Manual does not, in itself, give a requester a right of access to information. Whether access is granted depends on full compliance with the procedural requirements of PAIA and POPIA and on whether any of the grounds for refusal listed in Chapter 4 of Part 3 of PAIA apply.



Graham Silva Insurance Consultants CC  
Vehicle, household, business and personal health insurance

### 3. About Graham Silva Insurance Consultants cc

GSIC is a South African Close Corporation that has provided personal and commercial insurance and financial advisory services to its clients since 1996. GSIC is an authorised Financial Services Provider regulated by the Financial Sector Conduct Authority.

#### 3.1 Company details

Item	Detail
Registered name	Graham Silva Insurance Consultants cc
Trading name	Graham Silva Insurance Consultants
Type of entity	Close Corporation
Registration number	1996/022569/23
FSP licence number	5671 (issued by the FSCA in terms of FAIS)
Physical address	43 Dunrobin Street, Sydenham, Johannesburg, Gauteng, 2192
Postal address	PO Box 92079, Norwood, 2117
Telephone	011 640 7558
General email	<a href="mailto:info@grahamsilva.co.za">info@grahamsilva.co.za</a>
Website	<a href="http://www.grahamsilva.co.za">www.grahamsilva.co.za</a>

#### 3.2 Categories of business activity

GSIC provides advice and intermediary services in respect of the following financial product categories:

- Short-term insurance — personal lines and commercial lines;
- Long-term insurance — life, disability, dread disease, funeral and related risk products;
- Medical scheme membership advice (where applicable); and
- Investment and financial planning, including retirement annuities and savings products.

### 4. Information Officer — contact details

All formal PAIA requests, POPIA enquiries and complaints relating to the processing of personal information should be directed in the first instance to the Information Officer:



Role	Details
Information Officer	Ms Dianne Silva <i>Member, Graham Silva Insurance Consultants cc</i>
Telephone	011 640 7558
Email	<a href="mailto:dianne@grahamsilva.co.za">dianne@grahamsilva.co.za</a>
Postal address	PO Box 92079, Norwood, 2117
Physical address	43 Dunrobin Street, Sydenham, Johannesburg, 2192

**Note:** In terms of section 1 of PAIA read with section 56 of POPIA, the Information Officer of GSIC is the head of the private body. Ms Silva has been duly designated to perform the statutory duties of the Information Officer. Where the Information Officer is absent, the most senior available member of GSIC will act in that capacity.

## 5. The Regulator's Guide on how to use PAIA

In terms of section 10 of PAIA, the Information Regulator has compiled and made available an updated Guide on how to use PAIA ("the Guide"). The Guide explains, in plain language, how a member of the public can exercise rights of access under PAIA and POPIA, and is available in each of the official languages and in braille.

The Guide can be obtained from the Information Regulator, free of charge, at:

Information Regulator (South Africa)	Contact
Physical and postal address	JD House, 27 Stiemens Street Braamfontein, Johannesburg, 2001 <i>(Office: Woodmead North Office Park, 54 Maxwell Drive, Woodmead, 2191)</i>
Telephone	010 023 5200
Toll-free	0800 017 160
General enquiries	<a href="mailto:enquiries@info regulator.org.za">enquiries@info regulator.org.za</a>
PAIA complaints	<a href="mailto:PAIAComplaints@info regulator.org.za">PAIAComplaints@info regulator.org.za</a>
POPIA complaints	<a href="mailto:POPIAComplaints@info regulator.org.za">POPIAComplaints@info regulator.org.za</a>
Website	<a href="https://info regulator.org.za">https://info regulator.org.za</a>

A copy of the Guide is also available for inspection at GSIC's offices during normal business hours, and on the Regulator's website.



## 6. Categories of records automatically available

In terms of section 52 of PAIA, GSIC voluntarily makes the following categories of records available to the public without the need to submit a formal PAIA request:

Category	Examples of records	On website	On request
Company information	Trade name, registered office, FSCA licence number and broker contact details	✓	✓
Statutory disclosures	FAIS Section 13 representative disclosure and conflict-of-interest management policy summary	✓	✓
Product information	General brochures, fact sheets and product descriptions issued by GSIC or its product providers	✓	✓
Compliance documents	PAIA Manual, POPIA Privacy Notice	✓	✓
Complaints and TCF	Complaints-handling procedure and Treating Customers Fairly statement	✓	✓
Marketing material	Newsletters, social-media communications and general marketing collateral	✓	✓



## 7. Records available under other legislation

In addition to PAIA, GSIC is required to keep records under the legislation set out below. Disclosure of these records is governed by the relevant statute and is subject to its specific requirements and exemptions.

Category of records	Applicable legislation
<ul style="list-style-type: none"><li>• Founding Statement and amendments</li><li>• Members' interests and member changes</li><li>• Minutes of members' meetings and resolutions</li></ul>	Close Corporations Act, No. 69 of 1984
<ul style="list-style-type: none"><li>• Authorisation as an FSP, including category of products</li><li>• Representative register, qualifications and class-of-business records</li><li>• Continuous Professional Development (CPD) records</li><li>• Compliance reports and supervisory records</li><li>• Conflict-of-interest declarations and gifts register</li><li>• Records evidencing fit-and-proper compliance</li><li>• Complaints register and records of complaints resolution</li></ul>	Financial Advisory and Intermediary Services Act, No. 37 of 2002 ("FAIS")
<ul style="list-style-type: none"><li>• Customer due-diligence and "Know Your Client" records</li><li>• Records of cash, suspicious and unusual transactions</li><li>• Risk management and compliance programme (RMCP)</li><li>• Training records of accountable institution employees</li></ul>	Financial Intelligence Centre Act, No. 38 of 2001 ("FICA")
<ul style="list-style-type: none"><li>• Client mandates and broker appointments</li><li>• Policy schedules, endorsements and renewal records</li><li>• Claims records, including reserve and settlement notes</li><li>• Reinsurance arrangements (where applicable)</li></ul>	Short-Term Insurance Act, No. 53 of 1998 and Insurance Act, No. 18 of 2017
<ul style="list-style-type: none"><li>• Long-term insurance policy records</li><li>• Beneficiary nominations and dependants' information</li></ul>	Long-Term Insurance Act, No. 52 of 1998
<ul style="list-style-type: none"><li>• Medical scheme membership application and broker records (where applicable)</li></ul>	Medical Schemes Act, No. 131 of 1998
<ul style="list-style-type: none"><li>• POPIA Privacy Notice and consent records</li><li>• Data subject requests and responses</li></ul>	Protection of Personal Information Act, No. 4 of 2013



Category of records	Applicable legislation
<ul style="list-style-type: none"> <li>Records of personal information security compromises</li> <li>Records of cross-border transfers of personal information</li> </ul>	
<ul style="list-style-type: none"> <li>Employee contracts of employment and HR records</li> <li>Disciplinary, grievance and dismissal records</li> </ul>	<p>Basic Conditions of Employment Act, No. 75 of 1997 and Labour Relations Act, No. 66 of 1995</p>
<ul style="list-style-type: none"> <li>Income tax returns and supporting schedules</li> <li>PAYE, UIF and SDL records</li> <li>VAT records, where applicable</li> <li>Audited or compiled annual financial statements</li> <li>General accounting and ledger records</li> </ul>	<p>Income Tax Act, No. 58 of 1962, Tax Administration Act, No. 28 of 2011, Value-Added Tax Act, No. 89 of 1991, Unemployment Insurance Act, No. 63 of 2001</p>
<ul style="list-style-type: none"> <li>Occupational injury reports and related records</li> </ul>	<p>Compensation for Occupational Injuries and Diseases Act, No. 130 of 1993 and Occupational Health and Safety Act, No. 85 of 1993</p>
<ul style="list-style-type: none"> <li>Code of conduct, anti-bribery and anti-corruption records</li> </ul>	<p>Prevention and Combating of Corrupt Activities Act, No. 12 of 2004</p>
<ul style="list-style-type: none"> <li>Software licences and intellectual-property records</li> </ul>	<p>Copyright Act, No. 98 of 1978 and Electronic Communications and Transactions Act, No. 25 of 2002</p>



## 8. Subjects on which GSIC holds records

GSIC maintains records on the categories of data subjects and matters listed below. Please note that:

- the categories below are general and not exhaustive;
- many of the records held by GSIC contain information about third parties (such as clients, employees or service providers) and are therefore subject to additional grounds for refusal under PAIA;
- each request for access to a record will be evaluated on its own merits in accordance with PAIA and POPIA. Requesters should accordingly ensure that their request is thoroughly motivated.

Subject	Categories of records held
Internal company and operational records	<ul style="list-style-type: none"><li>• Founding Statement, members' resolutions, internal policies and procedures</li><li>• Business and strategic plans, marketing plans, board and management packs</li><li>• Financial records, management accounts and statutory registers</li><li>• Internal correspondence, IT and information-security records, business-continuity records</li></ul>
Personnel records	<ul style="list-style-type: none"><li>• Employment contracts, job descriptions and personnel files</li><li>• Payroll, leave, training and performance records</li><li>• Disciplinary, grievance and dispute records</li><li>• Tax, pension and medical-aid records relating to employees</li><li>• Background, criminal and credit checks (where lawfully conducted)</li></ul>
Client and policyholder records	<ul style="list-style-type: none"><li>• Identification, FICA and KYC records</li><li>• Financial Needs Analysis records, advice records and records of advice</li><li>• Policy schedules, endorsements, schedules of cover and renewal records</li><li>• Quotations, mandates and broker-of-record letters</li><li>• Premium collection and payment records</li><li>• Claims documentation, reports and settlement records</li><li>• Records of complaints and TCF outcomes</li></ul>
Service providers and suppliers	<ul style="list-style-type: none"><li>• Supplier contracts, service-level agreements and operator agreements (POPIA s.21)</li><li>• Vendor banking and tax details</li><li>• Invoices, statements and payment records</li></ul>
Legal, compliance and risk records	<ul style="list-style-type: none"><li>• FSCA correspondence, licences and inspection records</li><li>• Information Regulator correspondence and registrations</li><li>• Risk Management and Compliance Programme (RMCP) under FICA</li></ul>



43 Dunrobin Street, Cnr 12th Avenue,  
Sydenham  
T : 011 640 7558

Subject	Categories of records held
Graham Silva Insurance Consultants Vehicle, household, business and personal health insurance	<ul style="list-style-type: none"><li>• Conflict-of-interest declarations and gift registers</li><li>• Internal and external legal opinions and correspondence</li></ul>
Tax and financial records	<ul style="list-style-type: none"><li>• Tax returns and SARS correspondence</li><li>• Books of account, ledgers, cash books and bank statements</li><li>• Audited or compiled annual financial statements</li><li>• Asset register and fixed-asset records</li></ul>



## 9. Processing of personal information (POPIA)

### 9.1 Purposes for which GSIC processes personal information

GSIC processes personal information for the following lawful purposes:

- Client onboarding and identification, including verification of identity under FICA;
- Provision of advice and intermediary services, including the rendering of a Financial Needs Analysis and recommendation of suitable products;
- Placement and administration of insurance and investment policies with product providers;
- Premium collection, debit-order administration and reconciliation;
- Claims notification, investigation, assessment and settlement;
- Ongoing customer service, including renewals, queries and complaints handling;
- Compliance with applicable legislation and lawful requests from regulators, courts, SARS, the Financial Intelligence Centre and law-enforcement agencies;
- Internal record-keeping, audit, risk-management and fraud-prevention activities;
- Direct marketing to existing clients in relation to similar products, with the right to opt out at any time, and to other persons only with prior consent;
- Human-resources administration in relation to employees and contractors.

### 9.2 Categories of data subjects and information processed

Category of data subject	Categories of personal information processed
Clients and prospective clients (including policyholders, members, beneficiaries and dependants)	<ul style="list-style-type: none"><li>• Full names, identity / passport numbers, gender, date of birth, marital status</li><li>• Contact details, residential and postal addresses</li><li>• Tax numbers and FICA verification documents</li><li>• Financial information, including income, expenses, bank account and credit details</li><li>• Risk profile, financial-needs analysis and product preferences</li><li>• Insurance policy information, claims information and loss history</li><li>• Special personal information where strictly necessary, including health information for life and disability cover, and criminal-history information in relation to certain insurance underwriting requirements (POPIA s.26 and 32)</li></ul>
Employees and prospective employees	<ul style="list-style-type: none"><li>• Identity, contact and next-of-kin information</li><li>• Tax, payroll and banking information</li><li>• Employment history, qualifications and references</li></ul>



Category of data subject	Categories of personal information processed
Graham Silva Insurance Consultants Vehicle, household, business and personal health insurance	<ul style="list-style-type: none"> <li>• Disciplinary, performance, training and CPD records</li> <li>• Medical-aid, retirement-fund and disability information</li> </ul>
Service providers, suppliers, intermediaries and counterparties	<ul style="list-style-type: none"> <li>• Company / entity identification details and authorised representatives' contact details</li> <li>• Tax, VAT and banking information</li> <li>• Contracts and service-level agreements</li> </ul>
Visitors and other parties	<ul style="list-style-type: none"> <li>• Names, contact details and visit details</li> <li>• CCTV footage (where applicable, subject to a separate notice)</li> </ul>

### 9.3 Recipients of personal information

Personal information may be disclosed to the following categories of recipients, in each case only where necessary and on a lawful basis:

- Product providers, insurers, reinsurers and underwriting managers in order to place, administer and service the data subject's policies;
- Banks, debit-order processors and payment-system providers for the collection and refund of premiums;
- Loss adjusters, assessors, attorneys, investigators and other claim-related service providers;
- Operators appointed under POPIA section 21, including IT, cloud, hosting and software-as-a-service providers, who process personal information on GSIC's behalf under written contracts;
- Regulators and statutory bodies, including the FSCA, Information Regulator, FAIS Ombud, the Ombudsman for Short-Term Insurance, the Ombudsman for Long-Term Insurance, the Council for Medical Schemes and the Prudential Authority;
- The Financial Intelligence Centre, SARS, the South African Police Service and other law-enforcement and tax authorities, in accordance with applicable law;
- External auditors, accountants, legal and compliance advisers;
- Credit bureaus and verification agencies, where strictly required to verify a data subject's identity, credit standing or insurance history;
- Any person duly authorised by the data subject in writing;
- Any requester to whom a successful PAIA or POPIA access request has been granted.

### 9.4 Cross-border transfers of personal information

GSIC currently stores all client and employee personal information on systems located within the Republic of South Africa, and it is GSIC's policy not to transfer personal information outside the Republic. Should this position change in future — for example as a result of a change in service providers — GSIC will only transfer personal information across borders in accordance with section 72 of POPIA, namely where:

- the data subject has consented to the transfer;
-



---

Graham Silva Insurance Consultants CC  
Vehicle, household, business and personal health insurance

- the recipient is subject to a law, binding corporate rules or binding agreement that provides an adequate level of protection;
- the transfer is necessary for the performance of a contract with the data subject; or
- the transfer is for the benefit of the data subject and consent cannot reasonably be obtained but, if it could, would likely be given.

This Manual will be updated to reflect any future cross-border data flows.

### 9.5 Security safeguards

GSIC takes appropriate, reasonable, technical and organisational measures to secure the integrity and confidentiality of personal information in its possession or under its control, in accordance with section 19 of POPIA. These measures are reviewed regularly and include:

- documented information-security and acceptable-use policies;
- role-based access controls, with personal information accessible only to staff who require it for their duties;
- multi-factor authentication for access to client-record systems and email;
- perimeter and endpoint protection, including firewalls, anti-virus and anti-malware software;
- regular software updates and patch management;
- encrypted, off-site backups and a documented business-continuity plan;
- written confidentiality and POPIA awareness undertakings by all staff and operators;
- a documented procedure for identifying, containing, assessing and reporting security compromises to the Information Regulator and affected data subjects.



## 10. How to request access to a record

Requests for access to records held by GSIC must be made in the manner prescribed by PAIA and POPIA. The procedure is summarised below.

### 10.1 Prescribed forms

Any request for access to a record must substantially correspond with the relevant prescribed form, namely:

- **Form 2 (PAIA Regulations, 2021)** — for any person requesting access to a record held by GSIC. A copy of this form is attached as Annexure B.
- **Form 1 (POPIA Regulations, 2018)** — for any data subject objecting to the processing of their personal information by GSIC. A copy is attached as Annexure C.
- **Form 2 (POPIA Regulations, 2018)** — for any data subject requesting the correction or deletion of their personal information, or the destruction of a record. A copy is attached as Annexure D.

The most recent versions of all prescribed forms are available on the Information Regulator's website at <https://inforegulator.org.za>. Requests that do not substantially comply with the prescribed form will be returned to the requester for correction.

### 10.2 Submitting your request

Completed forms, together with supporting documents, must be submitted to the Information Officer at the contact details in section 4 above. A request must:

- (1) identify the requester and a sufficient address for delivery of correspondence;
- (2) provide adequate particulars to enable the requested record to be identified;
- (3) identify the right that the requester seeks to exercise or protect, and explain why the record is required for that purpose (in the case of a request to GSIC as a private body);
- (4) identify the form of access required and, where applicable, the language in which it is preferred;
- (5) be accompanied by a certified copy of the requester's identity document or other acceptable proof of identity; and
- (6) if made on behalf of another person, be accompanied by written proof of authority (such as a power of attorney).

### 10.3 Free POPIA access by data subjects

In terms of section 23 of POPIA, a data subject may, free of charge and on proof of identity, ask GSIC to confirm whether GSIC holds personal information about the data subject. GSIC may, however, charge a reasonable fee for providing a record of that personal information, in which case a written estimate of the amount payable will be provided to the data subject before the work is undertaken.



## 11. Fees

In terms of section 54 of PAIA, GSIC is entitled to charge fees in respect of PAIA requests. The fees are prescribed in Annexure B to the PAIA Regulations and are reproduced in Annexure A of this Manual.

### 11.1 Types of fees

- **Request fee** — R140.00 per request (inclusive of VAT). This is payable on submission of the request and is non-refundable, save where the request fee was not in fact payable.
- **Access fee** — calculated with reference to the reproduction format, the time reasonably required to search for and prepare the record, and postal or electronic transmission costs.
- **Deposit** — where preparation of the record is expected to take in excess of six hours, GSIC may require a deposit of not more than one third of the estimated access fee.

### 11.2 Notification and payment

Once the request fee has been received, GSIC will notify the requester in writing of the access fee payable (if any). Access to the record will only be provided once all required fees have been paid in full. Where the request is refused or the record does not exist, this will be confirmed in writing and the request fee will be retained or refunded as may be applicable.

## 12. Grounds on which access may be refused

In terms of Chapter 4 of Part 3 of PAIA, GSIC may, or in some cases must, refuse access to a record. The principal grounds on which access may be refused include:

- **Section 63** — unreasonable disclosure of personal information of a third party (a natural person);
- **Section 64** — disclosure of commercial information of a third party, including trade secrets, financial, commercial, scientific or technical information that may harm the third party's commercial or financial interests;
- **Section 65** — breach of a duty of confidence owed to a third party;
- **Section 66** — disclosure that could reasonably be expected to endanger the life or physical safety of an individual;
- **Section 67** — prejudice to the security of property;
- **Section 68** — records produced for, or in anticipation of, legal proceedings or which are subject to legal professional privilege;
- **Section 69** — disclosure that would prejudice GSIC's own commercial position, financial or contractual interests, or contain confidential research records.

**Mandatory disclosure** — Notwithstanding the above, section 70 of PAIA requires GSIC to disclose a record (subject to the section 70 conditions) where disclosure would reveal a substantial contravention of, or failure



to comply with, the law or an imminent and serious public-safety or environmental risk, and where the public interest in disclosure clearly outweighs the harm contemplated.

**Third-party notification** — Where a request affects a third party, GSIC will, within 21 days, notify that third party of the request and afford them a further 21 days to make representations as contemplated in sections 71 and 72 of PAIA.

### 13. Remedies if access is refused

GSIC does not operate an internal appeal procedure. Decisions of the Information Officer are final within GSIC. A requester or third party who is dissatisfied with a decision of the Information Officer may, in terms of sections 56A and 78 of PAIA, pursue the following external remedies:

- (7) Lodging a complaint with the Information Regulator using Form 5 of the PAIA Regulations within 180 days of being informed of the decision; and / or
- (8) Applying to a court of competent jurisdiction for appropriate relief in terms of section 78 of PAIA.

Complaints may be submitted electronically to [PAIAComplaints@inforegulator.org.za](mailto:PAIAComplaints@inforegulator.org.za) or in any other manner prescribed by the Regulator.

### 14. Availability of this Manual

This Manual is available, free of charge, in the following ways:

- on GSIC's website at <https://www.grahamsilva.co.za>;
- for inspection at GSIC's offices during normal business hours, by appointment with the Information Officer;
- by email or post to any person on written request to the Information Officer, on payment of a reasonable copying fee (where applicable); and
- to the Information Regulator on request, in accordance with the Regulator's submission requirements at <https://inforegulator.org.za>.

The Manual is available in English. Translations into any other official language of the Republic will be provided on reasonable request to the Information Officer.

### 15. Updating of this Manual

GSIC will review and, where necessary, update this Manual at least annually and whenever there is a material change to GSIC's operations, products, services or applicable law. The current version is recorded on the cover page of this Manual.



43 Dunrobin Street, Cnr 12th Avenue,  
Sydenham  
T : 011 640 7558  
w : [www.grahamsilva.co.za](http://www.grahamsilva.co.za)  
E : [Info@grahamsilva.co.za](mailto:Info@grahamsilva.co.za)

---

Graham Silva Insurance Consultants CC  
Vehicle, household, business and personal health insurance

**Signed at Johannesburg on this 19th day of May 2026.**

---

**Dianne Silva**

*Information Officer | Graham Silva Insurance Consultants cc*



## Annexure A — Schedule of PAIA fees (Private Body)

(As prescribed in Annexure B to the PAIA Regulations, 2021, as amended.)

Item	Description	Amount
1	Request fee, payable by every requester	R140.00
2	Photocopy or printed black-and-white A4 page (or part thereof)	R2.00 per page
3	Printed copy of an A4-size page (or part thereof)	R2.00 per page
4	Copy in computer-readable form on a flash drive provided by the requester	R40.00
5	Copy in computer-readable form on a CD provided by the requester	R40.00
6	Copy in computer-readable form on a CD provided by GSIC	R60.00
7	Transcription of an audio record (per A4-size page)	R24.00
8	Transcription or copy of visual images (per A4 page)	Outsourced; fee per service-provider quotation
9	Search and preparation time after the first hour (per hour or part thereof)	R145.00 (capped at R435.00 in total)
10	Deposit where search time exceeds 6 hours	One-third of estimated access fee
11	Postage, email or other electronic transfer	Actual expense, if any

**Note:** Fees are subject to change by the Minister of Justice and Constitutional Development. The current schedule is also published on the Information Regulator's website.



## Annexure B — Form 2: Request for access to a record (PAIA)

[Regulation 7] · Promotion of Access to Information Act, 2000

**NOTE:** 1. Proof of identity must be attached to this form. 2. If the request is made on behalf of another person, written proof of authorisation must be attached.

**To:** The Information Officer, Graham Silva Insurance Consultants cc, 43 Dunrobin Street, Sydenham, Johannesburg, 2192. Email: dianne@grahamsilva.co.za

### A. Particulars of the requester

Field	Details
Full names of requester	
Identity / passport number	
Capacity in which request is made (if applicable)	
Postal address	
Physical address	
Telephone (work / cell)	
Email	
Preferred manner of correspondence	Email / post / facsimile / other

### B. Person on whose behalf the request is made (if applicable)

Field	Details
Full names	
Identity / passport number	
Postal address	
Physical address	
Telephone / email	

### C. Particulars of the record requested



Field	Details
Description of the record or part of the record	
Reference number, if available	
Any further particulars	
Type of record (mark with X)	Written / printed · Visual images · Audio · Electronic
Form of access required (mark with X)	Printed copy · Electronic copy · Transcription · Inspection at GSIC's offices
Preferred language	

**D. Right being exercised or protected (private bodies only)**

Set out which right is sought to be exercised or protected and explain why the record is required to exercise or protect that right (continue on a separate signed page if more space is needed).

**E. Fees and notification**

(a) The prescribed request fee must be paid before the request will be considered. (b) GSIC will notify you in writing of the access fee payable (if any) before the record is released. (c) If you qualify for any exemption from payment of the request fee, please provide reasons:

**F. Signature**

Signed at \_\_\_\_\_ this \_\_\_\_\_ day of \_\_\_\_\_ 20\_\_\_\_\_.

\_\_\_\_\_  
*Signature of requester / person on whose behalf the request is made*

**For official use**

Field	Details
Reference number	
Request received by (rank, name and surname of Information Officer)	
Date received	
Request fee paid (R140.00)	



43 Dunrobin Street, Cnr 12th Avenue,  
Sydenham  
T : 011 640 7558

Field	Details
Access fee (if any) Vehicle, household, business and personal health insurance	Global Silva Insurance Consultants CC health insurance
Deposit (if any)	
Signature of Information Officer	



Graham Silva Insurance Consultants CC  
Vehicle, household, business and personal health insurance

## Annexure C — Form 1: Objection to processing of personal information (POPIA)

**[Regulation 2(1) of the POPIA Regulations, 2018]** · Section 11(3) of the Protection of Personal Information Act, 2013

This form may be used by a data subject to object to the processing of their personal information by Graham Silva Insurance Consultants cc on grounds set out in section 11(1)(d), (e) or (f) of POPIA.

### A. Details of the data subject

Field	Details
Full names and surname	
Identity / passport number	
Residential / postal address	
Contact telephone	
Email	

### B. Details of the responsible party

Field	Details
Name of responsible party	Graham Silva Insurance Consultants cc
Information Officer	Dianne Silva
Email	dianne@grahamsilva.co.za

### C. Nature of objection

Set out the reasons for the objection in sufficient detail to enable the Information Officer to investigate. Identify the personal information concerned and the grounds in section 11(1) of POPIA on which the objection is based.

### D. Signature

Signed at \_\_\_\_\_ this \_\_\_\_\_ day of \_\_\_\_\_ 20\_\_\_\_\_.

\_\_\_\_\_  
*Signature of data subject / authorised representative*



## Annexure D — Form 2: Request for correction or deletion of personal information (POPIA)

**[Regulation 3(2) of the POPIA Regulations, 2018]** · Section 24(1) of the Protection of Personal Information Act, 2013

This form may be used by a data subject to request the correction, destruction or deletion of personal information that is inaccurate, irrelevant, excessive, out of date, incomplete, misleading or obtained unlawfully, or which GSIC is no longer authorised to retain.

### A. Details of the data subject

Field	Details
Full names and surname	
Identity / passport number	
Residential / postal address	
Contact telephone	
Email	

### B. Details of the responsible party

Field	Details
Name of responsible party	Graham Silva Insurance Consultants cc
Information Officer	Dianne Silva
Email	dianne@grahamsilva.co.za

### C. Particulars of correction or deletion requested (mark applicable)

Action	Description
Correct	Specify the personal information that is inaccurate, irrelevant, excessive, out of date, incomplete or misleading, and the correction sought.
Destroy or delete	Specify the personal information that is to be destroyed or deleted and the reason.
Destroy or delete record	Specify the record of personal information that GSIC is no longer authorised to retain.



43 Dunrobin Street, Cnr 12th Avenue,  
Sydenham  
T : 011 640 7558  
w : www.grahamsilva.co.za  
E : Info@grahamsilva.co.za

---

Graham Silva Insurance Consultants CC  
Vehicle, household, business and personal health insurance

**D. Reasons / supporting information**

Provide reasons or attach evidence supporting the request:

**E. Signature**

Signed at \_\_\_\_\_ this \_\_\_\_\_ day of \_\_\_\_\_ 20\_\_\_\_.

\_\_\_\_\_  
*Signature of data subject / authorised representative*