

# Manual

Prepared in terms of Section 51 of the Promotion of Access to Information Act 2 of 2000 (PAIA), read with the Protection of Personal Information Act 4 of 2013 (POPIA)

## The Mantis Model (Pty) Ltd, trading as underwriting.life

Registration number 2018/198006/07 · VAT 4450291812

**Effective date:** 13 June 2026

**Version:** 1.0

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### 1. Introduction and purpose of this Manual

The Mantis Model (Pty) Ltd ("Mantis Model", "the Company", "we" or "us") is a private body as defined in PAIA. This Manual is published in terms of section 51 of PAIA to inform requesters of the records we hold, the procedure for requesting access to those records, and the rights available under PAIA and POPIA.

Mantis Model operates **underwriting.life**, a secure underwriting-intelligence platform used by life insurers, reinsurers and their authorised intermediaries to verify identity and to retrieve medical, pathology and financial-crime screening information relevant to insurance underwriting. Because of the nature of this business we process personal information, including special personal information concerning health, and we have aligned this Manual with POPIA.

This Manual is available free of charge on our website at <https://underwriting.life> and on request from our Information Officer.

### 2. Particulars of the private body (section 51(1)(a))

**Name:** The Mantis Model (Pty) Ltd, trading as underwriting.life

**Registration number:** 2018/198006/07

**VAT number:** 4450291812

**Head of the body / Information Officer:** Kurt Terblanche

**Postal and physical address:** 11 Blackenfien Crescent, Bryanston, 2191, South Africa

**Telephone:** 083 441 4745

**Email:** [admin@underwriting.life](mailto:admin@underwriting.life)

**Website:** <https://underwriting.life>

The Information Officer is registered with the Information Regulator under registration number 2026-019341. No Deputy Information Officer has been designated; requests should be directed to the Information Officer above.

### 3. The Guide of the Information Regulator (section 51(1)(b))

The Information Regulator has published a Guide on how to use PAIA, which contains the information a person may need to exercise their rights under PAIA and section 23 of POPIA. The Guide is available, in each official language, from the Information Regulator:

#### Information Regulator (South Africa)

Woodmead North Office Park, 54 Maxwell Drive, Woodmead, Johannesburg, 2191

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P.O. Box 31533, Braamfontein, 2017

Telephone: 010 023 5200 · Toll free: 0800 017 160

Email: [enquiries@inforegulator.org.za](mailto:enquiries@inforegulator.org.za) · [PAIAComplaints@inforegulator.org.za](mailto:PAIAComplaints@inforegulator.org.za)

Website: <https://inforegulator.org.za>

## 4. Categories of records and how they are organised (section 51(1)(d) and (e))

### 4.1 Records automatically available

We do not currently make any category of record automatically available for inspection, purchase or copying in terms of section 52 of PAIA, other than this Manual and our Privacy Policy, which are published on our website.

### 4.2 Records held by the Company

The following are the categories of records we hold. Access to any record is subject to the grounds for refusal in Chapter 4 of Part 3 of PAIA and to our confidentiality and POPIA obligations.

**Company and statutory records:** records of incorporation and registration, memorandum of incorporation, statutory registers, minutes and resolutions, tax and VAT records, and records held in terms of the Companies Act.

**Client and contractual records:** agreements with Clients (insurers, reinsurers and intermediaries), data-processing and consent arrangements, account and user records, and correspondence.

**Supplier and data-source records:** agreements and correspondence with our data providers (identity verification, financial-crime screening, and medical/pathology data partners).

**Operational and processing records:** Applicant screening requests and underwriting-intelligence reports generated through the platform; identity-verification results; sanctions, PEP and adverse-media screening results; and medical scheme claims and pathology results retrieved for a specific application. These contain personal and special personal information and are subject to strict access controls.

**Personnel records:** records relating to our staff and contractors, including employment, payroll and statutory records.

**Financial records:** accounting records, invoices, billing records, bank records and financial statements.

**Information governance and security records:** audit logs, access logs, security policies, and POPIA compliance records.

## 5. Personal information processed and POPIA particulars

In line with POPIA and the regulations to PAIA, we set out the categories of data subjects and the personal information we process:

**Insurance Applicants** (individuals submitted for screening by a Client): identity and contact identifiers; identity-verification results; medical scheme claims history and pathology/laboratory results (special personal information concerning health); and sanctions, PEP and adverse-media screening results.

**Client users** (insurer and intermediary staff): names, work contact details, role, authentication data and audit records.

**Employees, contractors and suppliers:** identifying, contact, contractual, financial and statutory information necessary to manage those relationships.

**Recipients:** Clients who requested a screening; regulated third-party data sources queried to perform a screening; service providers (operators) bound by written confidentiality and security obligations; and persons or authorities to whom disclosure is required by law.

**Cross-border flows:** personal information is hosted in South Africa and is not transferred outside the Republic in the ordinary course of operating the service.

**Security safeguards:** described in our Privacy Policy and include encryption in transit and at rest, role-based access control, mandatory two-factor authentication, audit logging, and independent security review. Our full Privacy Policy is available at <https://underwriting.life>.

The purposes for which we process this information, the lawful basis (including consent and the insurance authorisation under section 32 of POPIA), and data-subject rights are set out in our Privacy Policy, which forms part of the information made available with this Manual.

## 6. Records available in terms of other legislation

Certain records may be accessible, or are kept, in terms of other legislation, including: the Companies Act 71 of 2008; the Tax Administration Act 28 of 2011 and the Value-Added Tax Act 89 of 1991; the Income Tax Act 58 of 1962; the Labour Relations Act 66 of 1995; the Basic Conditions of Employment Act 75 of 1997; the Employment Equity Act 55 of 1998; the Unemployment Insurance Act 63 of 2001; the Compensation for Occupational Injuries and Diseases Act 130 of 1993; the Financial Intelligence Centre Act 38 of 2001; and the Protection of Personal Information Act 4 of 2013. Access in terms of those laws follows the procedures in the relevant Act.

## 7. How to request access to a record (section 51(1)(c) and (e))

### 7.1 Form of request

A requester must complete the prescribed **Form 2 (Request for Access to Record of Private Body)**, published under Regulation 7 of the PAIA Regulations, and submit it to the Information Officer at the address in section 2 above. The form is available from the Information Regulator at <https://info regulator.org.za> and will be supplied on request.

The request must: provide sufficient detail to identify the record and the requester; specify the form of access required; specify a postal address, email or fax in the Republic; and, where the request is made in the interest of another person, submit proof of the capacity in which the requester is acting. In terms of section 53(2)(d) of PAIA, a requester who seeks access to a record of a private body must **identify the right that is sought to be exercised or protected and explain why the requested record is required** for the exercise or protection of that right.

### 7.2 Processing and decision

The Information Officer will respond to a request within **30 days** of receiving it (which period may be extended by a further 30 days in the circumstances allowed by section 57 of PAIA), notifying the requester of the decision and, where access is granted, the access fee payable and the form of access. The outcome is communicated using **Form 3**.

### 7.3 Grounds for refusal

Access may be refused on any of the grounds set out in Chapter 4 of Part 3 of PAIA, including the mandatory protection of the privacy of a third party who is a natural person (section 63), the commercial information of a third party (section 64), confidential information, the safety of individuals and property, records privileged from production in legal proceedings, and the commercial activities of the Company (section 68). Given the sensitivity of the personal and health information we hold, requests touching on third-party

Applicant information will ordinarily be refused unless the strict conditions for disclosure are met.

#### 7.4 Fees

Two fees may apply, as prescribed in the PAIA Fees regulations: a **request fee**, payable on submission before the request is processed (this does not apply to a personal requester seeking access to their own personal information), and an **access fee** calculated according to the prescribed tariff to cover the cost of reproduction, search and preparation, and, where applicable, postage. The current fee structure is published by the Information Regulator at <https://info regulator.org.za>. The Information Officer will notify the requester of any deposit and access fee payable before access is given.

### 8. Remedies available if a request is refused

PAIA does not provide for an internal appeal against a decision of a private body. A requester who is dissatisfied with a decision (including a refusal, the fees charged, the form of access, or a failure to respond within the prescribed period) may:

- **Lodge a complaint with the Information Regulator** using the prescribed **Form 5 (Complaint Form)**, within 180 days, after which the Regulator may investigate and seek to resolve the matter; or
- **Apply to a court** (a High Court or another court of competent jurisdiction) for appropriate relief in terms of section 78 of PAIA.

Complaints to the Information Regulator may be submitted to the contact details in section 3 above.

### 9. Availability and updating of this Manual

This Manual is available, free of charge:

- on our website at <https://underwriting.life>;
- at our registered address, on request to the Information Officer; and
- at the office of the Information Regulator.

Copies are available in English. We will review and update this Manual whenever there is a material change to our records, processing or contact details, and at least as often as required by section 51(2) of PAIA.

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