



IBG Underwriting Managers

FSP: 36515

IBG Underwriting Managers is an authorised Financial Services Provider with FSP number 365151 Underwriting on behalf of Renasa Insurance Company Limited, a licensed non-life insurer and FSP.

Data Destruction and Retention Policy

1. Introduction

IBG Underwriting Managers Pty Ltd has developed this policy to highlight and ensure compliance with information and data security requirements. In addition, records management, through the proper control of the content, storage and volume of records, reduces the vulnerability to legal challenge and financial loss and promotes best value in terms of human and space resources through greater co-ordination of information and storage systems.

IBG Underwriting Managers Pty Ltd is also required to align its procedures and processes with records, data and information protection laws. The policy applies to all who receive, create, have access to, manage, store and dispose records, including electronic records.

2. Policy Statement

It is the policy of IBG Underwriting Managers Pty Ltd to manage its records in an accountable, effective and efficient manner through the implementation of a records management programme that takes into account related objectives such as orderly classification of records, retention and disposal, accessibility, security and confidentiality, training performance and quality management. IBG Underwriting Managers Pty Ltd is committed to protecting records and documents that contain sensitive information of the company, customers, employees, suppliers and contractors.

To this end –

- (a) All records received or created by IBG Underwriting Managers Pty Ltd shall be managed, protected and disposed of in line with the regulatory framework applicable to this policy.
- (b) IBG Underwriting Managers Pty Ltd shall follow sound procedures for the creation, maintenance, retention and disposal of all records, including electronic records.
- (c) The records management procedures of IBG Underwriting Managers Pty Ltd comply with legal requirements.
- (d) IBG Underwriting Managers Pty Ltd shall follow sound procedures for the security, privacy and confidentiality of its records.

IBG Underwriting Managers (Pty)

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An Authorised Financial Services Provider FSB No: 36515
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- (e) IBG Underwriting Managers Pty Ltd shall have performance measures for all records management functions and will review compliance with these measures.

3. Purpose of Policy

Records management policy outlines the principles, practices and procedures for the Management of IBG Underwriting Managers Pty Ltd records.

The purpose of this policy is to:

- a. Regulate documents and records management practices within IBG Underwriting Managers Pty Ltd and align them with relevant legislation
- b. Provide direction to employees on the registration, creation, approval, receipt, access, organisation, storage, use and disposal of documents, information and records
- c. Ensure that IBG Underwriting Managers Pty Ltd is protected by complying with the records and information management legislation
- d. Ensure confidentiality, privacy, security, integrity, accessibility and irretrievability of all employees' information and records among others, to ensure the safety of all important and sensitive documents and information. The policy further ensures ease of access to records and information. This will ensure efficient and effective execution of its functions. The policy further ensures continuity in the event of a disaster and protects the rights and interests of employees, clients, and other present and future stakeholders.

4. Policy Principles

This policy is developed based on the following principles that govern and support record management, record keeping and data retention practices:

- (a) Documents and records must be managed properly from creation to disposal.
- (b) IBG Underwriting Managers Pty Ltd follows sound procedures and practices for the creation, receiving, maintenance, retention and disposal of all records and data, including electronic records.
- (c) IBG Underwriting Managers Pty Ltd will follow sound procedures for the security, privacy and confidentiality of its data, records, as well as personal information at its disposal.
- (d) Identification, assessment and management of records, data and information security risks.

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- (e) Monitoring of compliance with policy and reporting of areas of concern and / or non – compliance.
- (f) Implementing safe disposal methods for data and documents containing company, customer and supplier sensitive and personal information.
- (g) Valuable documents and records must be secured at all times.
Documents and records must be accessible to authorised employees for business purposes.
- (h) IBG Underwriting Managers Pty Ltd records and documents must be securely stored and preserved in a proper manner.
- (i) The purpose of this policy is to provide guidelines to all company employees on how to treat specific types of information, what confidentiality levels apply to what information classes, and especially what information may be shared with external parties.
- (j) IBG Underwriting Managers Pty Ltd personnel are encouraged to use good judgment in securing IBG Underwriting Managers Pty Ltd Confidential information to the proper extent - if an employee is uncertain of the sensitivity of a particular piece of information, he/she should contact their manager.

5. Storage and caring for records

- a. All IBG Underwriting Managers Pty Ltd records shall be kept in storage areas or facilities that are appropriate for the type of medium as per the file plan.
- b. A record must only be kept in paper-based format in cases where it is deemed extremely necessary to keep it in its original form.

6. Access and security

- (a) Records shall at all times be protected from unauthorised access, movement and tempering with, to sustain their authenticity and reliability.
- (b) No employee may remove documents and records that are not available in the public domain from IBG Underwriting Managers Pty Ltd offices or storage facilities without the explicit and written permission of Management.
- (c) No staff member shall provide information and records that are not in the public domain to the public without written approval of the Managing Director as per the PAIA.
- (d) Specific guidelines for requesting information are contained in the Promotion of Access to Information Manual that is maintained by the Information Officer.

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- (e) Personal information shall be maintained in terms of the Protection of Personal Information.
- (f) No staff shall disclose any personal information of any member of staff, client or other stakeholder of IBG Underwriting Managers Pty Ltd to any other person without prior written approval of the Management.
- (g) Security classified documents shall be protected against or from unauthorised disclosure.
- (h) Records storage area shall at all times be protected from or against unauthorised access. In this regard the following measures shall apply:
 - i. Records storage areas and records storage facilities shall be locked when not in use.
 - ii. Access to server rooms and storage areas for electronic records media shall be managed through appropriate access control.

7. Managing email records

- a. E-mails that are evidence of the business transactions of IBG Underwriting Managers Pty Ltd are public records and shall be managed and kept for as long as they are required for functional and/or historical purposes.
- b. E-mails that approve an action, authorise an action, contain guidance, advice or direction, relate to projects and activities being undertaken, and external stakeholders, represent formal business communication between staff, contain policy decisions, etc. should be managed as records and should be filed securely. This policy covers the e-mail message itself as well as any attachments that meet these criteria.

8. Email of departing staff members

- a. Staff are required to perform a clean-up of all non-business related email messages in the email system prior to separating from IBG Underwriting Managers Pty Ltd or transferring to another organisation.
- b. The records management function in collaboration with the Human Resources department, applies clearance procedures to all staff resigning from Sasria to ensure that records and emails are identified and filed so that they can be searched for, retrieved and retained for as long as needed.

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9. Clean desk practices

The following principles govern and support IBG Underwriting Managers Pty Ltd clean desk practices:

- (a) Filing / Safekeeping / locking up of confidential information and documents when unattended.
- (b) Approval of clean desk procedures and processes by the relevant Executive Manager, and implementation thereof by IBG Underwriting Managers Pty Ltd Management and staff.
- (c) Availability of lockable storage and shredding facilities for use by all employees.
- (d) Identification, assessment and management of data and information security risks.
- (e) Monitoring of compliance with the Policy and reporting of areas of concern and / or non – compliance.
- (f) Minimising the printing of hard copy documents and encouraging the use of electronic documentation alternatives.
- (g) Reporting of incidents and information security near misses.
- (h) Training of staff to ensure awareness on the Policy and its attendant procedures and processes.
- (i) Implementing safe disposal methods for documents containing company, customer, staff and supplier sensitive and personal information.
- (j) Proper operation and security practices relating to information technology devices including computers, laptops, I-pads, cellular phones, memory sticks and other. This includes security of data stored in the software, locking the computers off when one is not in the office or at his or her desk, and switching off of computers at the end of the work day.
- (k) Implementation of internal controls by Management to ensure that such controls are operating effectively to deter, and detect areas of, non – compliance with the Policy.
- (l) All staff being alert and actively participating in proper document and information management and security.
- (m) All persons are responsible to ensure that no IBG Underwriting Managers Pty Ltd documents are left behind at meeting, conference and other related venues.

10. Disposal of records

- (a) No IBG Underwriting Managers Pty Ltd records (including e-mail) may be destroyed, erased or otherwise disposed of without prior written request to the Executive Manager responsible for records management.

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- (b) All destruction of records must be approved by the Executive Manager responsible for records management to ensure that archival records are not inadvertently destroyed.
- (c) Non-archival records which are needed for purposes of litigation, promotion of administrative justice actions and promotion of access to information purposes may not be disposed of until such time that the Executive Manager have indicated in writing that the destruction hold can be lifted.

11. Roles and Responsibilities of the Information Officer

- 8.1 The FSP's information Officer is Sangeline Robyn-Lee Nielsen
- 8.2 The Information Officer shall be responsible for overseeing the implementation of this Policy and for monitoring compliance with this Policy.

12. Implementation of Policy

This Policy shall be deemed effective as 25 June 2025. No part of this Policy shall have retroactive effect and shall thus apply only to matters occurring on or after this date.

This Policy has been approved and authorised by:

Name: Ivan Bernard Down

Signature: 

Position: Director

Date: 25 June 2025

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