

PAIA Section 51 Manual: ZATARA PROPERTY GROUP (PTY) LTD.

**PROMOTION OF ACCESS TO INFORMATION ACT
("PAIA")
AND
PROTECTION OF PERSONAL INFORMATION ACT
("POPIA")**

SECTION 51 MANUAL

Prepared in accordance with Section 51 of the Promotion of Access to
Information Act, No. 2 of 2000

This document serves as the information manual as required by Section 51(1) of the Promotion of Access to Information Act, No.2 of 2000 (the "Act") for a private body. It provides information on the records held and the process that is to be followed to request access to such records.

ZATARA PROPERTY GROUP (PTY) LTD.

Private Body

DATE OF COMPILATION: 5 OCTOBER 2022

DATE OF REVISION: 8 MAY 2023

DATE OF REVISION: 13 OCTOBER 2023

PAIA Section 51 Manual: **ZATARA PROPERTY GROUP (PTY) LTD.**

Contents

PART A: General 4

A.1. What is the purpose of this Manual?	5
A.2. What is the status and scope of this Manual?	5
A.3. Introduction to the Company	5
A.4. Our rights under the Promotion of Access to Information Act	6
A.5. Availability of this manual [<i>S 51(1)(a)(i) – Promotion of Access to Information Act</i>]	7

PART B: Processing Operations insofar the PAIA Act concerned 9

B.1. Description of the guide referred to in section 10, if available, and how to obtain access to it [Sect 51(1)(b)(i)]	10
B.2. The latest notice in terms of section 52(2), if any, regarding the categories of record of ZATARA PROPERTY GROUP (PTY) LTD. which are available without a person having to request access in terms of this Act [Sect 51(1)(b)(ii)]	11
B.3. A description of the records of ZATARA PROPERTY GROUP (PTY) LTD. which are available in accordance with any other legislation [Sect 51(1)(b)(iii)]	11
B.4. Sufficient detail to facilitate a request for access to a record of the body, a description of the subjects on which the body holds records and the categories of records held on each subject [Sect 51(1)(b)(iv)]	13

Part C: Processing Operations insofar the POPI Act concerned 14

C.1. The purpose of the processing [Sect 51(1)(c)(i)]	15
C.2. A description of the categories of data subjects and of the information or categories of information relating thereto [Sect 51(1)(c)(ii)]	15
C.3. The recipients or categories of recipients to whom the personal information may be supplied [Sect 51(1)(c)(iii)]	18
C.4. Planned transborder flows of personal information [Sect 51(1)(c)(iv)]	18
C.5. A general description allowing a preliminary assessment of the suitability of the information security measures to be implemented by the responsible party to ensure the confidentiality, integrity and availability of the information which is to be processed. [Sect 51(1)(c)(v)].	19

PAIA Section 51 Manual: ZATARA PROPERTY GROUP (PTY) LTD.

Part D: Procedure for making a request under PAIA 19

D.1. How can I make a request to ZATARA PROPERTY GROUP (PTY) LTD. under PAIA?.....	19
D.2. How will my PAIA request be processed by ZATARA PROPERTY GROUP (PTY) LTD.?	21
D.3. What if I'm not happy about how ZATARA PROPERTY GROUP (PTY) LTD. handled my PAIA/POPI request?.....	22
D.4. What are the charges applicable to my PAIA/POPI request?	22

Part E: Forms 24

E.1. FORM 02 Request for Access to Record (Regulation 7).....	25
E.2. FORM 03 Outcome of Request and of Fees Payable (Regulation 8).....	29
E.3. POPIA Form 1: Objection to the Processing of Personal Information in terms of Section 11(3) of the Protection of Personal Information Act, 2013 (Act No. 4 of 2013)	31
E.4. POPIA Form 2: Request for Correction or Deletion of Personal Information or Destroying or Deletion of Record of Personal Information.....	33

PAIA Section 51 Manual: ZATARA PROPERTY GROUP (PTY) LTD.

Background to the 06.10_Section 51 PAIA Manual

This 06.10_Section 51 PAIA Manual is designed to help you compile your Company's own section 51 PAIA Manual and include the amendments made by the POPI Act to the PAIA Act.

Purpose

To compile a section 51 PAIA Manual for ZATARA PROPERTY GROUP (PTY) LTD.

Effective Date

The Manual is in force with approval.

R. Rodrigues
Approved by:

[Signature]
Approval Signature:

PAIA Section 51 Manual: **ZATARA PROPERTY GROUP (PTY) LTD.**

PART A: General

A.1. What is the purpose of this Manual?

- A.1.1. Under the Promotion of Access to Information Act 2000 ("PAIA"), ZATARA PROPERTY GROUP (PTY) LTD., (hereinafter referred to as "**ZATARA PROPERTY GROUP (PTY) LTD.**", "**we**" and "**us**") is required to grant individuals access to records held by ZATARA PROPERTY GROUP (PTY) LTD. if that record is required by the individual to exercise or protect any legal right that individual enjoys under the law.
- A.1.2. Additionally, under the Protection of Personal Information 2013 ("POPI"), ZATARA PROPERTY GROUP (PTY) LTD. are required to be open and transparent about how we handle personal information and allow individuals to access and correct their personal information.
- A.1.3. The purpose of this Manual is to set out the information which ZATARA PROPERTY GROUP (PTY) LTD. is legally required to disclose under PAIA and POPI, and to explain how you can exercise your statutory rights under PAIA and POPI with respect to records and personal information handled by us.

A.2. What is the status and scope of this Manual?

- A.2.1. This Manual (version 2.0) was last updated on 13 October 2023 and will become effective on **16 October 2023**.
- A.2.2. This Manual may be revised from time to time to reflect changes in laws and regulations, or changes in ZATARA PROPERTY GROUP (PTY) LTD.' business operation.

A.3. Introduction to the Company

- A.3.1. This private Company is the company of Quinta Trust (IT77/20168), Luis Franco Family Trust (IT15/2010) and Rod Group Holdings (Pty) Ltd (2015/020098/07). ZATARA PROPERTY GROUP (PTY) LTD. is a South African entity specialising in Property Development, Property Management, Retail Management and Turnaround & Renovation of Properties.
- A.3.2. Our Company is run according to the requirements set by the LABOUR RELATIONS ACT NO 66 OF 1995 and the PROPERTY PRACTITIONERS ACT 22 OF 2019 and are subject to the authority of The South African Council of Shopping Centre (SACSC), The South African Property Owners Association (SAPOA), The Institute of Real Estate Management (IREM) and The Green Building Council of South Africa (GBCSA).

PAIA Section 51 Manual: ZATARA PROPERTY GROUP (PTY) LTD.

- A.3.3. The Consultants practicing at the Company provide Professional Property Management Services, Project Management Services, Retail Leasing and Consulting Services, Rent Recovering and Accounts Payment Services, Manage Buildings for Sustainability Services, Vacant Space Management Services, Lease Renewal Negotiations Services, Sectional Title Property Management Services, Commercial, Residential & Leisure Management Services, Budgeting and Forecasting Maintenance Management Risk & Compliance Services within the scope and ambit of their registration, competence and training at the Company.
- A.3.4. Requesters should note that commercial information and financial information may be withheld on the grounds of sections 63-70.

A.4. Our rights under the Promotion of Access to Information Act

- A.4.1. On 9 March 2001, the Promotion of Access to Information Act, became operative, giving effect to the constitutional right of access to any information held by the State and any information that is held by another person and that is required for the exercise or protection of any rights; and to provide for matters connected therewith.
- A.4.2. Under PAIA, everyone has the right to access
- a) any information held by the state; and
 - b) any information that is held by another person and that is required for the exercise or protection of any rights.
- A.4.3. A public body may make a request for information under PAIA only if, in making the request, the public body is acting in the public interest.
- A.4.4. Records ZATARA PROPERTY GROUP (PTY) LTD. makes available under PAIA is described hereinafter. If you wish to make a request under PAIA ZATARA PROPERTY GROUP (PTY) LTD., please follow the procedure described in the Section 10 Manual. Please note that your request will be subject to the applicable charges set out in Section 10 Manual.

PAIA Section 51 Manual: **ZATARA PROPERTY GROUP (PTY) LTD.**

A.4.5. You can learn more about your rights under PAIA by contacting the South African Human Rights Commission (“SAHRC”) at:

Address: Braampark Forum 3
33 Hoofd Street
Braamfontein
South Africa

E-Mail: info@sahrc.org.za

Website: <http://www.sahrc.org.za>

Tel No: +27 11 877 3600

A.5. Availability of this manual [S 51(1)(a)(i) – Promotion of Access to Information Act]

- A.5.1. A copy of this manual is available to the public for inspection at our website/registered offices as listed below or on request from the designated contact person.
- A.5.2. **Contact Details [S 51(1)(a)(i)]** - This contact person is responsible for the administration of and compliance with the Act in a fair objective and unbiased manner.

Company Name: ZATARA PROPERTY GROUP (PTY) LTD.

Registration No: 2017/008191/07

Information Officer: Richard Rodrigues

Deputy Information Officer: Edwin Turton

Physical Address: Suite 19, 1st Floor, Preller Square Shopping Centre
Graaf Reinet Street, Dan Pienaar
Bloemfontein
9301

PAIA Section 51 Manual: ZATARA PROPERTY GROUP (PTY) LTD.

Postal Address: PO Box 28222
Danhof
9310

Tel No: 051 436 2200

Fax No: 051 436 2210

E-Mail Address: admin@psquare.co.za

Website: www.zataragroup.co.za

A.5.3. Affiliated Entities – This is a list of all affiliated entities under ZATARA PROPERTY GROUP (PTY) LTD. who is responsible for the administration of and compliance with the Act in a fair objective and unbiased manner.

Albrecht Property Investments (Pty) Ltd	2015/385679/07
Blazecor 106 CC	2005/055107/23
Des Investments CC	2007/140199/23
Do Rego Holdings (Pty) Ltd	2020/055893/07
DRF Property Investments CC	2007/178529/23
East End Meat Properties (Pty) Ltd	2020/004320/07
Emily Court (Pty) Ltd	2019/395637/07
Exton Investments (Pty) Ltd	2015/447867/07
Falk Street Investments (Pty) Ltd	2014/075343/07
Gowin 115 (Pty) Ltd	2010/017278/07
Hilton Investments (Pty) Ltd	2019/054165/07

PAIA Section 51 Manual: **ZATARA PROPERTY GROUP (PTY) LTD.**

Intellec Fund Managers (Pty) Ltd	2012/198114/07
Invest in CBD (Pty) Ltd	2019/423074/07
Invest in Property 44 (Pty) Ltd	2003/026908/07
JFC Property Development (Pty) Ltd	2019/478902/07
Nicfay Investments CC	2007/140198/23
Preller Square Properties (Pty) Ltd	2016/376675/07
Quinta Trust	IT000077/2016
R Group Trust	IT001301/2013
Rodgroup (Pty) Ltd	2015/020098/07
Second Avenue Investments (Pty) Ltd	2014/074880/07
Shellyvale Properties (Pty) Ltd	2015/107349/07
Silver Falcon Trading 426 (Pty) Ltd	2007/004008/07
Stadium Court (Pty) Ltd	2014/141523/07
Tennmen CC	1988/003143/23
Vogue Warehouse (Pty) Ltd	2015/447850/07
ZPG Solar (Pty) Ltd	2019/152324/07

PAIA Section 51 Manual: **ZATARA PROPERTY GROUP (PTY) LTD.**

PART B: Processing Operations insofar the PAIA Act concerned

B.1. Description of the guide referred to in section 10, if available, and how to obtain access to it [Sect 51(1)(b)(i)].

- B1.1. The ACT grants a requester access to records of a private body, if the record is required for the exercise or protection of any rights. If a public body lodges a request, the public body must be acting in the public interest.
- B1.2. Requests in terms of the ACT shall be made in accordance with the prescribed procedures, at the rates provided.
- B1.3. Requesters are referred to the Guide in terms of Section 10 which has been compiled by the South African Human Rights Commission, which will contain information for the purposes of exercising Constitutional Rights.
- B1.4. The Guide is available from the SAHRC.
- B1.5. The contact details of the Commission are:

Postal Address:	Private Bag 2700 Houghton, 2041
Tel No:	+27-11-877 3600
Fax No:	+27-11-403 0625
Website:	www.sahrc.org.za

PAIA Section 51 Manual: **ZATARA PROPERTY GROUP (PTY) LTD.**

B.2. The latest notice in terms of section 52(2), if any, regarding the categories of record of the Company of ZATARA PROPERTY GROUP (PTY) LTD. which are available without a person having to request access in terms of this Act [Sect 51(1)(b)(ii)].

1. Inspection in terms of legislation other than this Act	None
2. Purchase or copying from us	None
3. From us free of charge	Property related brochures, information leaflets

B.3. A description of the records of the Company of ZATARA PROPERTY GROUP (PTY) LTD. which are available in accordance with any other legislation [Sect 51(1)(b)(iii)].

Records are kept in accordance with the following legislation (this list is not exhaustive):

- Arbitration Act No 42 of 1965
- Basic Conditions of Employment Act 75 of 1997
- Bill of Rights (BOR)
- Customs and Excise Act No. 91 of 1964
- Children's Act 38 of 2005
- Companies Act 71 of 2008
- Compensation for Occupational Injuries and Diseases Act 130 of 1993
- Consumer Affairs (Unfair Business Practices) Act No 71 of 1988
- Consumer Protection Act 68 of 2008
- Copyright Act No 71 of 2008
- Corporate Laws Amendment Act No 24 of 2006
- Credit Agreements Act No. 75 of 1980
- Current and Exchange Act No 9 of 1933
- Cybercrimes Act 19 of 2020
- Debtor Collectors Act No 114 of 1998
- Electronic Communications and Transactions Act 25 of 2002
- Employment Equity Act 55 of 1998
- Finance Act No 35 of 2000

PAIA Section 51 Manual: ZATARA PROPERTY GROUP (PTY) LTD.

- Financial Advisory and Intermediary Services Act No 37 of 2002
- Financial Intelligence Centre Act No 36 of 2000
- Financial Relations Act No 65 of 1976
- Financial Services Board Act No 97 of 1990
- Harmful Business Practices Act No 23 of 1999
- Hazardous Substances Act 15 of 1973
- Income Tax Act 95 of 1967
- Insurance Act No 27 of 1943
- Insolvency Act No. 24 of 1936
- Intellectual Property Laws Amendments Act No 38 of 1997
- Judicial Matters Amendment Act No 42 of 2001
- Labour Relations Act 66 of 1995
- Long Term Insurance Act No 52 of 1998
- Medical Schemes Act No 131 of 1998
- National Credit Act No 35 of 2005
- National Environment Management Act No 31(1) of 1998
- Occupational Health and Safety Act 85 of 1993
- Pension Funds Act No 24 of 1956
- Post Office Act No 44 of 1958
- Promotion of Access to Information Act 2 of 2000
- Property Practitioners Act No 22 of 2019
- Protection of Personal Information Act 4 of 2013
- Regional Services Councils Act No 109 of 1985
- Regulation of Interception of Communications and Provision of Communication-Related Information Act 70 of 2002
- Road Accident Fund Act 56 of 1996
- SA Reserve Bank Act No 90 of 1989
- Short Term Insurance Act No. 53 of 1998
- Skills Development Levies Act 9 of 1999
- Skills Development Act 97 of 1998
- Stamp Duties Act No 77 of 1968

PAIA Section 51 Manual: **ZATARA PROPERTY GROUP (PTY) LTD.**

- Stock Exchange Control Act No 1 of 1985
- Tax on Retirement Funds Act No 38 of 1996
- Trade Marks Act No 194 of 1993
- Unemployment Contributions Act 4 of 2002
- Unemployment Insurance Act 63 of 2001
- Usury Act No. 73 of 1968
- Value Added Tax Act 89 of 1991

B.4. Sufficient detail to facilitate a request for access to a record of the body, a description of the subjects on which the body holds records and the categories of records held on each subject [Sect 51(1)(b)(iv)]

The Company holds the following categories of records:

Categories of Records	Document Type
Records relating to the form of Company and related matters	Documents pertaining to a personal liability company as required by the Companies Act 71 of 2008, including, but not limited to the prescribed certificates, memorandum of incorporation, forms and registers of directors and shareholders, company rules, minute books, resolutions and shareholders' agreements; Company code/Registration number/s and related records
Employment records	Employment contracts; Conditions of employment and work place policies such as leave policies; Employment equity and skills development plans and reports; Salary and wage register; Performance management records; Documents related to disciplinary proceedings, arbitration awards, CCMA (Commission for Conciliation, Mediation and Arbitration) and other legal cases; Expense accounts; Relevant tax records and information pertaining to employees; contracts and related documents and records; Contracted staff lists
Pension / Retirement fund and medical scheme records	Pension/retirement fund and medical scheme rules; Records relevant to pension / retirement fund and medical scheme members, including payment of contributions
Financial records	Annual Financial Statements, including directors' reports; auditor's reports; Accounting Records; Bank statements; Invoices, statements, receipts and related documents
Tax and VAT records	Copies of tax returns and documents relating to income tax and VAT, including payments made and VAT registration

PAIA Section 51 Manual: ZATARA PROPERTY GROUP (PTY) LTD.

Client records	Records are kept in respect of all clients consulted at the Company, which include but not limited their property related history, status and relevant financial arrangements
Health and safety records	Evacuation plan; Information related to the Health and Safety Committee / Officer; Health and safety incident reports
Records related to property (movable and immovable)	Finance and Lease Agreements; Asset Register; Title Deeds; Mortgage Bonds; Debenture Register; Registers and Records kept in terms of the Property Practitioners Act No 22 of 2019; Stock sheets; Delivery notes and orders; Sale Agreements; Purchase Agreements
Other Agreements	Retail Lease Agreements, Rental Agreements, Offer to Purchase Agreements, Property Management and Sustainability Agreements, Project Management Agreements, Tenant Co-Ordination Agreements, Managed Accounting & Financial Solutions Agreements; Information Technology (IT) Agreements (software and hardware); Agreements Concerning Provision of Services; Agreements with Contractors & Suppliers.
Records relating to legal processes	Complaints, pleadings, briefs and other documents pertaining to any actual, pending or threatened litigation, arbitration or investigation; Settlement agreements; Legal opinions/advice
Insurance records	Insurance policies, including professional indemnity insurance policies and related records; Claims records

PAIA Section 51 Manual: ZATARA PROPERTY GROUP (PTY) LTD.

Part C: Processing Operations insofar the POPI Act concerned

C.1. The purpose of the processing [Sect 51(1)(c)(i)]

1. The professional Consultants who provide you with Property Development Services, Property Management Services, Retail Management Services and Turnaround & Renovation of Properties Services, advice and/or business solutions, maintain records about your business status and any service, advice and /or business solutions you have received previously. These records help to provide you with the best possible property related assistance, advice and/or business solutions.
2. Our records may be electronic, on paper or a mixture of both, and we use a combination of working practices and technology to ensure that your information is kept confidential and secure. Records which the Company hold about you may include the following information;
 - a) Details about you, such as your address, contact details, emergency contact details.
 - b) Any contact the Company has had with you, such as appointments, Company visits, emergency appointments, etc.
 - c) Notes and reports about your property related needs.
 - d) Details about your finances.
 - e) Results of investigations such as credit worthiness and criminal records, etc.
 - f) Relevant information from other professionals, relatives etc.
3. Other purposes for retaining records may include;
 - a) To provide and maintain our services to you;
 - b) To manage your property and/or development;
 - c) To manage your requests;
 - d) For the performance of an Agreement between us;
 - e) Be used for administrative or other purposes;
 - f) Be kept as direct evidence in litigation or injury compensation purposes;
 - g) Be used as data analysis;
 - h) Be kept for historical purposes;
 - i) Promote good property management and development;
 - j) For business transfers;
 - k) Serve as the basis for accreditation.

PAIA Section 51 Manual: **ZATARA PROPERTY GROUP (PTY) LTD.**

C.2. A description of the categories of data subjects and of the information or categories of information relating thereto [Sect 51(1)(c)(ii)]

- The Company holds the categories of records and personal information in respect of the categories of data subjects specified below.
- The potential recipients of the personal information processed by the Company are also specified.
- Information and records are only disclosed as may be necessary in the circumstances and authorised in terms of the law or otherwise with the consent of the relevant data subjects.

DATA SUBJECTS	CATEGORIES OF RECORDS	CATEGORIES OF PERSONAL INFORMATION	POTENTIAL RECIPIENTS OF THE PERSONAL INFORMATION
Directors, shareholders and employees	Employment contracts, records and policies; Insurance policies; Complaints; Disciplinary and court proceedings; Employment equity and skills development plans and records; Salary and payroll records; Leave records; Tax records, including PAYE, UIF (Unemployment Insurance Fund) and SDL (Skills Development Levies) returns and related records; Correspondence with IEASA, REBOSA, RHT, Insurers and other persons / bodies; Medical certificates; Continuing Professional Development (CPD) / training events, certificates and records	Names and surnames; Contact details e.g. address, telephone and fax numbers, e-mail addresses; Identity numbers / dates of birth; Race; Gender; Nationality; Qualifications; Registered profession; Category of registration; Employment history and information; Position held; Banking details; Relevant medical history; Criminal behavior and history; Correspondence; Notes, reports and records created by these data subjects in respect of clients; Tax numbers, returns and certificates; Leave periods; Medical certificates; Remuneration; Employment benefits; Absenteeism information; Next-of-kin details	Relevant statutory bodies such as the Institute of Estate Agents of South Africa (IEASA); the Real Estate Business Owners of South Africa (REBOSA); the Rental Housing Tribunal (RHT); Companies and Intellectual Property Commission (CIPC); Medical schemes; Contractors and vendors; Clients; Relevant public bodies, including government departments, e.g. Compensation Commissioner, Road Accident Fund (RAF), UIF, Department of Labour; Banks; Professional societies; Vetting agencies (e.g. of qualifications);

PAIA Section 51 Manual: ZATARA PROPERTY GROUP (PTY) LTD.

Other contractors, vendors and suppliers, e.g., IT vendors, claims switching companies, auditors, legal counsel, consultants, debt collectors	Agreements with contractors, vendors and suppliers; Non-Disclosure Agreements; Debt Collection Agreements; Legal opinions and advice; Invoices; Correspondence	Names and surnames; Company names; Relevant staff details; Contact details e.g., address, telephone and fax numbers, e-mail addresses, website addresses; Opinions; Correspondence; Track records; Price structures; Property/Retail arrangements	Banks; Auditors; Legal practitioners;
Insurers	Insurance policies; Payment of premiums; Claims' records and related documents	Names and contact details e.g., addresses, telephone and fax numbers, e-mail addresses; Premiums	Auditors; Legal practitioners; Relevant public bodies
Clients	Client records, including lease agreements, retail management agreements, property management agreements, property development agreements, financial records, financial arrangements, invoices, payment records and correspondence	Names and surnames; Contact details e.g. address, telephone and fax numbers, e-mail addresses; Identity numbers / dates of birth; Race; Gender; Nationality; Employers and their contact details; Name, surname and contact details of a relative / friend; Financial history, including details about property related statements; Fees charged, payments received and payment history; business and/or property management solutions; Complaints lodged; Correspondence; Client information forms; Consent forms; Client contracts	Sellers and/or Lessors, (potential or not); Buyers and/or Tenants (potential or not); Accounting and Financial Institutions; Accounting and Financial administrators; Other Property Management and/or Development Organizations; Managed business solution Organizations; Insurers; Employers; Debt collectors; Consultants to whom clients are referred; Credit lists (Blacklists); Bodies performing peer review; Statutory / Governmental bodies e.g., IEASA, REBOSA, RHT when responding to complaints, Compensation Commissioner, RAF; Other relevant service delivering property consultants; Next-of-kin

PAIA Section 51 Manual: **ZATARA PROPERTY GROUP (PTY) LTD.**

Property Consultants and other Property Institutions referring clients to the Company	Correspondence	Names and Surnames; Contact details e.g., address, telephone and fax numbers, e-mail addresses, Registration numbers of Property Consultants, Company code numbers of Property Consultants	Managed business solution organizations; Governmental bodies e.g., IEASA, REBOSA, RHT when responding to complaints, Compensation Commissioner, Bodies performing peer review
Insurance Companies	Claims; Remittance advices; Contracts; Correspondence; Scheme rules; Policy provisions	Contact details e.g., addresses, telephone and fax numbers, e-mail addresses	Clients; Debt collectors
Public Bodies (e.g., Department of Labour, Compensation Commissioner, UIF) and Statutory Bodies (e.g., IEASA, REBOSA, RHT)	Complaints submitted to statutory bodies and related documents; Correspondence; Newsletters and circulars issued by these bodies and councils; Payment of fees	Names: Contact details e.g., addresses, telephone and fax numbers, e-mail addresses; Office bearers; Fee structures	Clients

C.3. The recipients or categories of recipients to whom the personal information may be supplied [Sect 51(1)(c)(iii)]

The Company is not planning to send any personal information about any data subject across the borders of the Republic of South Africa to third parties in foreign countries. Should this be required, client consent will be obtained, where possible, and transfers of such information will occur in accordance with the requirements of the law.

C.4. Planned transborder flows of personal information [Sect 51(1)(c)(iv)]

Personal information of data subjects may be transferred across borders due to the hosting of some ZATARA PROPERTY GROUP (PTY) LTD. infrastructure and application in foreign jurisdictions. Current employees and consultants' information may also be transferred transborder where ZATARA PROPERTY GROUP (PTY) LTD. has a physical presence or may be providing services or performing in terms of its contractual obligations.

PAIA Section 51 Manual: **ZATARA PROPERTY GROUP (PTY) LTD.**

- C.5. A general description allowing a preliminary assessment of the suitability of the information security measures to be implemented by the responsible party to ensure the confidentiality, integrity and availability of the information which is to be processed. [Sect 51(1)(c)(v)].**
- a. The Company takes the privacy of persons seriously and is therefore committed to ensuring that personal information in its possession or under its control is secure.
 - b. In order to prevent unauthorised access or disclosure of information, appropriate physical, electronic and managerial procedures have been implemented to safeguard and secure the information. For example, access to information is controlled and only persons requiring the information for the property and business solutions for the clients, invoicing of clients as well as the administration of the Company have access to the information.
 - c. Access to electronic records is password controlled.
 - d. A privacy policy has been implemented to ensure that personal information is processed and stored strictly in accordance with the law and all persons who have access to that information are aware of their responsibilities.
 - e. Records are maintained in a structured filing system for as long as it is necessary in accordance with the relevant laws.
 - f. A risk assessment of the organisational and technical processes and procedures is conducted on a regular basis to ensure a continuous monitoring and enhancement of security measures in the Company.
 - g. Property Consultants, other staff and contractors are required to adhere to the strict policies and processes implemented by the Company and are subject to sanctions for any security breach.
 - h. All security breaches are taken seriously and are addressed in accordance with the law.

PAIA Section 51 Manual: **ZATARA PROPERTY GROUP (PTY) LTD.**

Part D: Procedure for making a request under PAIA.

D.1. How can I make a request to ZATARA PROPERTY GROUP (PTY) LTD. under PAIA?

D.1.1. In order to facilitate a timely response to requests for access, all requesters should take note of the following when completing the Access Request Form:

D.1.2. To facilitate the processing of your request, kindly:

1. Complete the Request Form, which is embedded in Part E of this Manual, also available on the website of the SOUTH AFRICAN HUMAN RIGHTS COMMISSION at www.sahrc.org.za (copy attached hereto as an example)
2. Address your request to the Head of this Company.
3. Provide sufficient details to enable us to identify:
 - (a) The record(s) requested;
 - (b) The requester (and if an agent is lodging the request, proof of capacity);
 - (c) The form of access required;
 - (d) The postal address or fax number of the requester in the Republic;
 - (e) If the requester wishes to be informed of the decision in any manner (in addition to written) the manner and particulars thereof;
 - (f) The right which the requester is seeking to exercise or protect with an explanation of the reason the record is required to exercise or protect the right.
 - (g) **Payment of Fees:**

Pay the applicable Request Fee described in Section D.4 below. Payment can be made via:

 - i. bank guaranteed cheque or postal order (written to ZATARA PROPERTY GROUP (PTY) LTD.); or
 - ii. EFT (direct bank transfer). If you wish to pay the applicable Request Fee via EFT, you will need to send the proof of payment together with your request. You can obtain the details required for EFT by contacting ZATARA PROPERTY GROUP (PTY) LTD. (see Section A.5 above for contact details).
 - iii. Unfortunately, ZATARA PROPERTY GROUP (PTY) LTD. cannot accept payment via credit card or debit card.
 - iv. This fee is not applicable to Personal Requesters, referring to any person seeking access to records that contain their personal information.

PAIA Section 51 Manual: ZATARA PROPERTY GROUP (PTY) LTD.

- v. The completed Access Request Form together with a copy of the identity document must be submitted either via conventional mail or e-mail and must be addressed to the contact person as indicated above.

D.2. How will my PAIA request be processed by ZATARA PROPERTY GROUP (PTY) LTD.?

- D.2.1. ZATARA PROPERTY GROUP (PTY) LTD. will process your request when the completed Request Form is received, and any applicable Request Fee is paid. Subject to Section D.2.2. below, your request will normally be processed within 30 days of receipt of the completed Request Form, provided that all of the required details are properly set out in the completed Request Form.
- D.2.2. If it turns out that it will take more than 30 days to process your request (e.g., due to the volume of records/personal information that must be processed, or difficulty in accessing the relevant record/personal information), ZATARA PROPERTY GROUP (PTY) LTD. may extend the aforementioned 30-day period in processing your request. Should this become necessary, ZATARA PROPERTY GROUP (PTY) LTD. will notify you.
- D.2.3. Once a decision on your request is reached, ZATARA PROPERTY GROUP (PTY) LTD. will notify you in writing. Where ZATARA PROPERTY GROUP (PTY) LTD. decides to:
 - a. grant access to the record/personal information requested, ZATARA PROPERTY GROUP (PTY) LTD. will notify you how the access will be granted and what Access Fees are payable and release the requested record/personal information upon receipt of the applicable Access Fee.
 - b. deny access to the record/personal information requested; ZATARA PROPERTY GROUP (PTY) LTD. will notify you of the reasons why access is denied.
 - c. complies with your request to correct or delete your personal information, confirm how your request has been or will be actioned; and
 - d. denies your request to correct or delete your personal information, confirm why your request has been denied.
- D.2.4. Where your request was a request for confirmation as to whether or not ZATARA PROPERTY GROUP (PTY) LTD. handles your personal information (i.e., you make a request under POPI s23(1)(a)), ZATARA PROPERTY GROUP (PTY) LTD. gives you the confirmation.

PAIA Section 51 Manual: **ZATARA PROPERTY GROUP (PTY) LTD.**

D.3. What if I am not happy about how ZATARA PROPERTY GROUP (PTY) LTD. handled my PAIA/POPI request?

- D.3.1. If you are not satisfied about the way in which your request was handled by ZATARA PROPERTY GROUP (PTY) LTD. (including where you are not happy about the Access Fee charged by ZATARA PROPERTY GROUP (PTY) LTD. or the length of time ZATARA PROPERTY GROUP (PTY) LTD. is taking to process your request), you can make an application for relief to the Constitutional Court, the High Court or another court of similar status.
- D.3.2. Please note that if you wish to make an application to the court, you will need to do so within 180 days of receiving the relevant decision made by ZATARA PROPERTY GROUP (PTY) LTD.

D.4. What are the charges applicable to my PAIA/POPI request?

- D.4.1. There are two types of fees which are payable under PAIA, namely Request Fee, and Access Fee.

D.4.2. Request Fee

Request Fee is payable upon making a request to access records/personal information, and it is **R140.00** (inclusive of VAT) for each request. You do not have to pay a Request Fee if:

- a. You are a private individual requesting access to your own records/personal information;
- b. You are single and earning less than R14,812 p/a; or
- c. You are married (or in a life partnership), and earning less than R27,192 p/a.

PAIA Section 51 Manual: **ZATARA PROPERTY GROUP (PTY) LTD.**

D.4.3. Access Fee

Access Fee is payable in respect of records/personal information which are produced in response to your request. Access Fee is payable by everyone who makes a request. The rate of Access Fees are as follows:

Type of activity involved in producing the record or personal information	Rate (inc. VAT)
The Request Fee payable by every Requester	R140.00
Photocopy/printed black & white copy of A4-size page	R2.00 per page or part thereof
Printed copy of A4-size page.	R2.00 per page or part thereof
For a copy in a computer-readable form on:	
Flash drive (to be provided by Requester)	R40.00
Compact disc (if provided by Requester)	R40.00
Compact disc (if provided to the Requester)	R60.00
For a transcription of visual images, for an A4-size page or part thereof.	Services to be outsourced. Will depend on quotation from the Service Provider.
Copy of visual images.	
Transcription of an Audio Record, per A4-size page or part thereof	R24.00
Copy of an Audio Record on:	
Flash drive (to be provided by Requester)	R40.00
Compact disc (if provided by Requester)	R40.00
Compact disc (if provide to the Requester).	R60.00
To search for and prepare the Record for disclosure, for each hour or part of an hour, excluding the first hour, reasonable required for such search and preparation.	R145.00
To not exceed a total cost of:	R435.00
Deposit: if search exceeds 6 hours.	One third of amount per Request calculated in terms of items 2 tot 8
Postage, e-mail, or any other electronic transfer	Actual expense if any

PAIA Section 51 Manual: **ZATARA PROPERTY GROUP (PTY) LTD.**

D.4.4. Please note that:

- a. where Request Fee is payable, your request will not be processed until you pay the Request Fee;
- b. where Access Fee is payable, the record/personal information you requested will not be released until the Access Fee is paid; and

D.4.5. Please also note that if you are not a private individual and if the search for and preparation of the record requested is in ZATARA PROPERTY GROUP (PTY) LTD.'s view likely to require more than 6 hours of work, ZATARA PROPERTY GROUP (PTY) LTD. reserves the right to require you to pay 1/3rd of the Access Fee up front as a deposit.

FORM 02
REQUEST FOR ACCESS TO RECORD
[Regulation 7]

NOTE:

1. Proof of identity must be attached by the requester.
2. If requests made on behalf of another person, proof of such authorisation, must be attached to this form.

TO: The Information Officer

(Address)

E-mail address: _____

Fax number: _____

Mark with an "X"

☐

Request is made in my own name

☐

Request is made on behalf of another person.

PERSONAL INFORMATION			
Full Names			
Identity Number			
Capacity in which request is made <i>(when made on behalf of another person)</i>			
Postal Address			
Street Address			
E-mail Address			
Contact Numbers	Tel. (B):		Facsimile:
	Cellular:		
Full names of person on whose behalf request is made <i>(if applicable)</i> :			
Identity Number			
Postal Address			

Street Address			
E-mail Address			
Contact Numbers	Tel. (B)		Facsimile
	Cellular		
PARTICULARS OF RECORD REQUESTED			
<p><i>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. (If the provided space is inadequate, please continue on a separate page and attach it to this form. All additional pages must be signed.)</i></p>			
Description of record or relevant part of the record:			
Reference number, if available			
Any further particulars of record			
TYPE OF RECORD <i>(Mark the applicable box with an "X")</i>			
Record is in written or printed form			
Record comprises virtual images <i>(this includes photographs, slides, video recordings, computer-generated images, sketches, etc.)</i>			
Record consists of recorded words or information which can be reproduced in sound			
Record is held on a computer or in an electronic, or machine-readable form			

MANNER OF ACCESS

(Mark the applicable box with an "X")

Personal inspection of record at registered address of public/private body <i>(including listening to recorded words, information which can be reproduced in sound, or information held on computer or in an electronic or machine-readable form)</i>	
Postal services to postal address	
Postal services to street address	
Courier service to street address	
Facsimile of information in written or printed format <i>(including transcriptions)</i>	
E-mail of information <i>(including soundtracks if possible)</i>	
Cloud share/file transfer	
Preferred language <i>(Note that if the record is not available in the language you prefer, access may be granted in the language in which the record is available)</i>	

PARTICULARS OF RIGHT TO BE EXERCISED OR PROTECTED

If the provided space is inadequate, please continue on a separate page and attach it to this Form. The Requester must sign all the additional pages

Indicate which right is to be exercised or protected	

Explain why the record requested is required for the exercise or protection of the aforementioned right:	

FEES	
a)	<i>A request fee must be paid before the request will be considered.</i>
b)	<i>You will be notified of the amount of the access fee to be paid.</i>
c)	<i>The fee payable for access to a record depends on the form in which access is required and the reasonable time required to search for and prepare a record.</i>
d)	<i>If you qualify for exemption of the payment of any fee, please state the reason for exemption.</i>
Reason	

You will be notified in writing whether your request has been approved or denied and if approved the costs relating to your request, if any. Please indicate your preferred manner of correspondence:

Postal address	Facsimile	Electronic communication (Please specify)

Signed at _____ this _____ day of _____ 20 _____

Signature of Requester / person on whose behalf request is made

FOR OFFICIAL USE

Reference number:	
Request received by: (State Rank, Name And	
Date received:	
Access fees:	
Deposit (if any):	

Signature of Information Officer

FORM 03
OUTCOME OF REQUEST AND OF FEES PAYABLE
[Regulation 8]

Note:

1. If your request is granted the—
 - (a) amount of the deposit, (if any), is payable before your request is processed; and
 - (b) requested record/portion of the record will only be released once proof of full payment is received.
2. Please use the reference number hereunder in all future correspondence.
Reference number: _____

TO: _____

Your request dated _____, refers.

1. You requested:

Personal inspection of information at registered address of public/private body (including listening to recorded words, information which can be reproduced in sound, or information held on computer or in an electronic or machine-readable form) is free of charge. You are required to make an appointment for the inspection of the information and to bring this Form with you. If you then require any form of reproduction of the information, you will be liable for the fees prescribed in Annexure B.	
--	--

OR

2. You requested:

Printed copies of the information (including copies of any virtual images, transcriptions and information held on computer or in an electronic or machine-readable form)	
Written or printed transcription of virtual images (this includes photographs, slides, video recordings, computer-generated images, sketches, etc.)	
Transcription of soundtrack (written or printed document)	
Copy of information on flash drive (including virtual images and soundtracks)	
Copy of information on compact disc drive(including virtual images and soundtracks)	
Copy of record saved on cloud storage server	

3. To be submitted:

Postal services to postal address	
Postal services to street address	
Courier service to street address	
Facsimile of information in written or printed format (including transcriptions)	
E-mail of information (including soundtracks if possible)	
Cloud share/file transfer	
Preferred language: (Note that if the record is not available in the language you prefer, access may be granted in the language in which the record is available)	

Kindly note that your request has been:

☐

Approved

☐

Denied, for the following reasons:

--

4. Fees payable with regards to your request:

Item	Cost per A4-size page or part thereof/item	Number of pages/items	Total
Photocopy			
Printed copy			
For a copy in a computer-readable form on:			
(i) Flash drive	R40.00		
• To be provided by requestor			
(ii) Compact disc	R40.00		
• If provided by requestor			
• If provided to the requestor	R60.00		
For a transcription of visual images per A4-size page	Service to be outsourced. Will depend on the quotation of the service provider		
Copy of visual images			
Transcription of an audio record, per A4-size	R24.00		
Copy of an audio record			
(i) Flash drive	R40.00		
• To be provided by requestor			
(ii) Compact disc	R40.00		
• If provided by requestor			
• If provided to the requestor	R60.00		
Postage, e-mail or any other electronic transfer:	Actual costs		
TOTAL:			

5. Deposit payable (if search exceeds six hours):

☐

Yes

☐

No

Hours of search		Amount of deposit (calculated on one third of total amount per request)	
-----------------	--	--	--

The amount must be paid into the following Bank account:

Name of Bank:

Name of account holder:

Type of account:

Account number:

Branch Code:

Reference Nr:

Submit proof of payment to:

Signed at _____ this _____ day of _____

20

Information officer

E.3. Objection to the Processing of Personal Information in terms of Section 11(3) of the Protection of Personal Information Act, 2013 (Act No. 4 of 2013)

Form 1
Objection to the Processing of Personal Information in terms of Section 11(3) of the
Protection of Personal Information Act, 2013 (ACT NO.
4 OF 2013)

REGULATIONS RELATING TO THE PROTECTION OF PERSONAL INFORMATION, 2018
[Regulation 2]

Note:

1. *Affidavits or other documentary evidence as applicable in support of the objection may be attached.*
2. *If the space provided for in this Form is inadequate, submit information as an Annexure to this Form and sign each page.*
3. *Complete as is applicable.*

A

DETAILS OF DATA SUBJECT

Name(s) and
surname/ registered
name of data
Unique Identifier/
Identity Number

Residential, postal or
business address:

Code ()

Contact number(s):

Fax number/E-mail
address:

B

DETAILS OF RESPONSIBLE PARTY

Name(s) and surname/
Registered name of
responsible party:

Residential, postal or
business address:

Code ()

Contact number(s):

Fax number/ E-mail
address:

C

REASONS FOR OBJECTION IN TERMS OF SECTION 11(1)(d) to (f) *(Please
provide detailed reasons for the objection)*

Signed at this day of 20.....

.....
Signature of data subject/designated person

E.4. Request for Correction or Deletion of Personal Information or Destroying or Deletion of Record of Personal Information

in terms of Section 24(1) of the Protection of Personal Information Act, 2013 (Act No. 4 of 2013)

FORM 2

Request for Correction or Deletion of Personal Information or Destroying or Deletion of Record of Personal Information INTERMS OF SECTION 24(1) OF THE PROTECTION OF PERSONAL INFORMATION ACT, 2013 (ACT NO. 4 OF 2013)

REGULATIONS RELATING TO THE PROTECTION OF PERSONAL INFORMATION, 2018
[Regulation 3]

Note:

1. *Affidavits or other documentary evidence as applicable in support of the request may be attached.*
2. *If the space provided for in this Form is inadequate, submit information as an Annexure to this Form and sign each page.*
3. *Complete as is applicable.*

Mark the appropriate box with an "x".

Request for:

☐

Correction or deletion of the personal information about the data subject which is in possession or under the control of the responsible party.

☐

Destroying or deletion of a record of personal information about the data subject which is in possession or under the control of the responsible party and who is no longer authorised to retain the record of information.

A

DETAILS OF THE DATA SUBJECT

Name(s) and surname /
registered name of data
subject:

Unique identifier/
Identity Number:

Residential, postal or
business address:

Code ()

Contact number(s):

Fax number/E-mail
address:

B

DETAILS OF RESPONSIBLE PARTY

Name(s) and
surname/ registered
name of responsible
Residential, postal or
business address:

Code()

Contact number(s):

Fax number/ E-mail
address:

C

INFORMATION TO BE CORRECTED/DELETED/ DESTRACTED/ DESTROYED

D

**REASONS FOR *CORRECTION OR DELETION OF THE PERSONAL INFORMATION ABOUT
THE DATA SUBJECT IN TERMS OF SECTION 24(1)(a) WHICH IS IN POSSESSION OR UNDER
THE CONTROL OF THE RESPONSIBLE PARTY ; and or
REASONS FOR *DESTRUCTION OR DELETION OF A RECORD OF PERSONAL INFORMATION
ABOUT THE DATA SUBJECT IN TERMS OF SECTION 24(1)(b) WHICH THE RESPONSIBLE
PARTY IS NO LONGER AUTHORISED TO RETAIN.
(Please provide detailed reasons for the request)**

Signed at this day of 20...

Signature of data subject/ designated person