

PROMOTION OF ACCESS TO **INFORMATION ACT MANUAL**

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

Version	Policy	Date
2	Amour Properties CC	30 March 2026

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1. LIST OF ACRONYMS AND ABBREVIATIONS

- **“CEO”** Chief Executive Officer
- **“DIO”** Deputy Information Officer
- **“IO”** Information Officer
- **“Minister”** Minister of Justice and Correctional Services
- **“PAIA”** Promotion of Access to Information Act No. 2 of 2000(as amended)
- **“POPIA”** Protection of Personal Information Act No.4 of 2013
- **“Regulator”** Information Regulator
- **“Republic”** Republic of South Africa
- **“Requester”** Person or entity, requesting access to a record that is under the control of Amour Properties
- **“The Body”** Amour Properties CC
- **“The Company”** Amour Properties CC

2. PURPOSE OF PAIA MANUAL

The objectives of this PAIA Manual is to -

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

3. KEY CONTACT DETAILS FOR ACCESS TO INFORMATION OF AMOUR PROPERTIES CC

Chief Information Officer

Name: Melody Mahdeb
Tel: 010 003 0049
Email: melody@amourproperties.co.za / help@amourproperties.co.za

Deputy Information Officer

Name:
Tel: 010 003 0049
Email: help@amourproperties.co.za

Access to information general contacts

Email: help@amourproperties.co.za

National or Head Office

Postal Address: P.O Box 92154,
Norwood, 2117

Physical Address: 4 Morribrook Avenue,
Linksfield North

Telephone: 010 003 0049
Email: help@amourproperties.co.za
Website: <https://amourproperties.co.za>

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

The Regulator has, in terms of *Section 10(1) of PAIA*, as amended, updated and made available the revised Guide on how to use PAIA (“Guide”), in an easily comprehensible form and manner, as may reasonably be required by a person who wishes to exercise any right contemplated in PAIA and POPIA.

The Guide is available in each of the official languages and in braille.

The aforesaid Guide contains the description of-

- 4.1. the objects of PAIA and POPIA;
- 4.2. the postal and street address, phone and fax number and, if available, electronic mail address of-
 - 4.2.1. the Information Officer of every public body, and
 - 4.2.2. every Deputy Information Officer of every public and private body designated in terms of *Section 17(1) of PAIA*¹ and *Section 56 of POPIA*²;

¹ *Section 17(1) of PAIA*- For the purposes of PAIA, each public body must, subject to legislation governing the employment of personnel of the public body concerned, designate such number of persons as deputy information officers as are necessary to render the public body as accessible as reasonably possible for requesters of its records.

² *Section 56(a) of POPIA*- Each public and private body must make provision, in the manner prescribed in section 17 of the *Promotion of Access to Information Act*, with the necessary changes, for the designation of such a number of persons, if any, as deputy information officers as is necessary to perform the duties and responsibilities as set out in section 55(1) of POPIA.

- 4.3. the manner and form of a request for-
 - 4.3.1. access to a record of a public body contemplated in *Section 11*³; and
 - 4.3.2. access to a record of a private body contemplated in *Section 50*⁴;
- 4.4. the assistance available from the IO of a public body in terms of PAIA and POPIA;
- 4.5. the assistance available from the Regulator in terms of PAIA and POPIA;
- 4.6. all remedies in law available regarding an act or failure to act in respect of a right or duty conferred or imposed by PAIA and POPIA, including the manner of lodging-
 - 4.6.1. an internal appeal;
 - 4.6.2. a complaint to the Regulator; and
 - 4.6.3. an application with a court against a decision by the information officer of a public body, a decision on internal appeal or a decision by the Regulator or a decision of the head of a private body;
- 4.7. the provisions of Sections 14⁵ and 51⁶ requiring a public body and private body, respectively, to compile a manual, and how to obtain access to a manual;
- 4.8. the provisions of Sections 15⁷ and 52⁸ providing for the voluntary disclosure of categories of records by a public body and private body, respectively;
- 4.9. the notices issued in terms of Sections 22⁹ and 54¹⁰ regarding fees to be paid in relation to requests for access; and
- 4.10. the regulations made in terms of Section 92¹¹.
- 4.11. Members of the public can inspect or make copies of the Guide from the offices of the public and private bodies, including the office of the Regulator, during normal working hours.

³ Section 11(1) of PAIA- A requester must be given access to a record of a public body if that requester complies with all the procedural requirements in PAIA relating to a request for access to that record; and access to that record is not refused in terms of any ground for refusal contemplated in Chapter 4 of this Part.

⁴ Section 50(1) of PAIA- A requester must be given access to any record of a private body if-

- a) that record is required for the exercise or protection of any rights;
- b) that person complies with the procedural requirements in PAIA relating to a request for access to that record; and
- c) access to that record is not refused in terms of any ground for refusal contemplated in Chapter 4 of this Part.

⁵ Section 14(1) of PAIA- The information officer of a public body must, in at least three official languages, make available a manual containing information listed in paragraph 4 above.

⁶ Section 51(1) of PAIA- The head of a private body must make available a manual containing the description of the information listed in paragraph 4 above.

⁷ Section 15(1) of PAIA- The information officer of a public body, must make available in the prescribed manner a description of the categories of records of the public body that are automatically available without a person having to request access

⁸ Section 52(1) of PAIA- The head of a private body may, on a voluntary basis, make available in the prescribed manner a description of the categories of records of the private body that are automatically available without a person having to request access

⁹ Section 22(1) of PAIA- The information officer of a public body to whom a request for access is made, must by notice require the requester to pay the prescribed request fee (if any), before further processing the request.

¹⁰ Section 54(1) of PAIA- The head of a private body to whom a request for access is made must by notice require the requester to pay the prescribed request fee (if any), before further processing the request.

¹¹ Section 92(1) of PAIA provides that –“The Minister may, by notice in the Gazette, make regulations regarding-

- a) any matter which is required or permitted by this Act to be prescribed;
- b) any matter relating to the fees contemplated in sections 22 and 54;
- c) any notice required by this Act;
- d) uniform criteria to be applied by the information officer of a public body when deciding which categories of records are to be made available in terms of section 15; and
- e) any administrative or procedural matter necessary to give effect to the provisions of this Act.”

4.12. The Guide can also be obtained-

4.12.1. upon request to the Information Officer;

4.12.2. from the website of the Regulator

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

Postal Address: P.O Box 3153,
Braamfontein, Johannesburg, 2017

Physical Address: JD House, 27 Stiemens Street,
Braamfontein, Johannesburg, 2001

Telephone: 010 023 5200

Email: enquiries@infoeregulator.org.za

4.12.3. For further guidance, contact the Information Regulator. They have compiled a PAIA guide in each official language of South Africa on how to exercise your rights under PAIA.

5. INFORMATION AVAILABLE WITHOUT HAVING TO SUBMIT A REQUEST (including but not limited to)

PAIA provides that certain records may automatically be made available. Should records be automatically available, a formal request for such records will not be necessary.

These records are automatically available to the public and the Information Regulator for inspection at the body's physical address during normal business hours.

Examples of records that may be automatically made available include:

- 5.1. any information on the Amour Properties' website (which includes www.amourproperties.co.za and www.listings.amourproperties.co.za);
- 5.2. public listings (which include details of properties available for sale and/or letting);
- 5.3. newsletters and circulars;
- 5.4. banking details (by email request);
- 5.5. general office branch information; and
- 5.6. information on property developments.

6. INFORMATION HELD IN TERMS OF THE PAIA

We hold the following subjects and categories of records in electronic or physical format, which we do not make automatically available.

- 6.1. Access may be granted to such records upon proper request and payment of a fee in terms of PAIA and this Manual, unless Amour Properties is entitled to refuse access to such records, or the records are exempted in terms of PAIA.
- 6.2. Amour Properties, maintains records on the categories and subject matters listed in below, either on behalf of or in conjunction with other entities associated with the company for this purpose.
- 6.3. The categories of records are not exhaustive but merely meant to give a broad indication of the records held.

- 6.4. The inclusion of any category of records should not be taken to mean that records falling within that category will be made available under PAIA. More in particular, certain grounds of refusal as set out in PAIA may be applicable to a request for such records.
- 6.5. Many of the records held by the company are those of third parties, such as customers and employees, and would constitute third party confidential information, which is not in the discretion of the company to disclose.
 - 6.5.1. In particular, where Amour Properties acts as a consultant, agent, broker, or advisor to a customer;
 - 6.5.2. many of the records held by the company are confidential and are considered the property of the customer and not the company.

6.5.2.1. Human Resources Records

These records are all our records about anyone who works for us and who receives or is entitled to receive remuneration.

- List of staff/employees/agents
- Contracts of employment with employees
- Personal records provided by each employee
- Employee and Agent tax information
- Internal evaluations and performance records
- Training records and manuals
- Disciplinary records
- Other statutory records
- Payroll records
- Internal policies and procedures

6.5.2.2. Company / Operational Records

Operational or Company records include any documents that have economic value to the business.

- Company name documents
- Company registration documents
- Financial records
- Operational records
- Databases
- Information technology
- Product records
- Training material
- Marketing material
- Audit reports
- Invoices in respect of creditors and debtors
- Bank facilities and account details
- Details of accounting officer or auditors
- Formal books of account and other financial statements
- Source documents
- Banking records

6.5.2.3. Customer Records and Information

Customer Information includes any information about anyone that we provide services to, including our customers, leads, or prospects.

- Contact details
- Property details
- Other records obtained in respect of customers and potential customers
- Contracts with the customer
- Contracts between the customer and other persons
- Correspondence with customers
- Correspondence with third parties
- Sales records
- Transactional information
- Records regarding legal proceedings involving customers of the company
- Other information relating to, or held on behalf of, customers

6.5.2.4. Immovable and Movable Property Records

- Agreements for the lease of immovable property
- Agreements for the lease or sale of movable property

6.5.2.5. Intellectual Property and Information Technology Records

- Trademarks, copyrights, and designs
- Records relating to domain names
- Software licences
- Records regarding computer systems and programmes

6.5.2.6. Marketing Records

- Marketing materials
- Marketing campaign history

6.5.2.7. Miscellaneous Records

- Internal policies and procedures used for compliance purposes
- Internal correspondence
- Suretyship agreements
- Security agreements, guarantees, and indemnities
- Agreements with suppliers of Amour Properties
- Correspondence including internal and external memoranda

7. INFORMATION HELD IN ACCORDANCE WITH ANY OTHER LEGISLATION

A non-exhaustive list of records in accordance with legislation other than POPIA or PAIA appears below;

Category of Records	Legislation
Employee details Information on disability, race, and religion	<i>Basic Conditions of Employment Act, No. 75 of 1997</i>

Employee next of kin or emergency contact details Education information Health and safety records Leave records Internal evaluations and performance records Disciplinary records Training records Background checks	
Registration records Formation & structure details Administration records Engagement letters Termination Letters Correspondence or enquiries from customers	<i>Close Corporations Act 69 of 1984</i>
Records of consumer transactions and contracts Complaint resolution records	<i>Consumer Protection Act, No. 68 of 2008</i>
Records of employees' earnings and particulars	<i>Compensation for Occupational Injuries and Diseases Act, No. 130 of 1993</i>
Electronic transaction records Records of electronic communications	• <i>Electronic Communications Act 36 of 2005</i> • <i>Electronic Communications and Transactions Act 25 of 2002</i>
Employment equity plans and records Records of employment equity assessments and targets Recruitment and promotion records	<i>Employment Equity Act, No. 55 of 1998</i>
Tax returns and filings Records of income, expenses, and deductions Tax compliance certificates and correspondence	<i>Income Tax Act, No. 58 of 1962</i>
Disciplinary records and outcomes Labour relations reports Arbitration awards	<i>Labour Relations Act, No. 66 of 1995</i>
Anti-bribery and corruption policy Whistleblowing policy Gift policy	<i>Prevention and Combating of Corrupt Activities Act, No. 12 of 2004</i>
Documents exchanged with the PPRA Agreements Mandatory Disclosure Forms Mandates Accounting records Communications regarding transactions Advertising or marketing material that relates to the carrying on of business as a property practitioner Fidelity Fund Certificates	<i>Property Practitioners Act, No. 22 of 2019</i>
Identification and verification records Know Your Client (KYC) Records Client due diligence records Risk Management and Compliance Program Training records Records of transactions conducted on behalf of clients, including details of the transaction, parties involved, and purpose of the transaction. Suspicious Activity/Transaction Reports (SARs/STRs) Cash Threshold Reports (CTRs)	<i>Financial Intelligence Centre Act, No 38 of 2001</i>

Risk assessments Compliance procedures Records of client details and transactions	
Sector education and training authority reports Skills development levies Certificates of completion	<i>Skills Development Act, No. 97 of 1998</i>
Tax invoices, credit notes, debit notes Bank statements, deposit slips Employee details and employment contracts Employer registration and contribution records UIF claims records Audit and inspection records	• <i>Unemployment Insurance Contributions Act, No. 4 of 2002</i> • <i>Unemployment Insurance Act, No. 30 of 1996</i>
VAT registration documents Tax invoices and credit notes VAT returns and filings VAT payment records VAT exemption certificates VAT compliance records Input VAT documentation Records for cross-border transactions	<i>Value Added Tax Act, No. 89 of 1991</i>

8. ACCESS REQUEST PROCEDURE

Records, whether specifically listed in this Manual or not, will only be made available subject to the provisions of PAIA.

- 8.1. To request access to a record, please complete [Form 2](#).
- 8.2. Please submit the completed form (together with the relevant request fee) to our information officer's email address or our physical address using the details we provide.
- 8.3. Please ensure that the completed form:
 - describes the right that you seek to exercise or protect,
 - explains why you need the requested record to exercise or protect that right,
 - has enough information for the information officer to identify you, the requested records, and the form of access you require,
 - specifies your email address, postal address, or fax number,
 - provides any other way you would like to be informed of our decision other than in writing, and
 - provides proof of the capacity in which you are making the request
 - if a request is made on behalf of another person, the Requester must submit proof of the capacity in which the Requester is making the request to the satisfaction of the head of Amour Properties.
- 8.4. If you do not use the standard form, we may:
 - reject the request due to lack of procedural compliance,
 - refuse it if you do not provide sufficient information, or
 - delay it.
- 8.5. **Our decision on giving you access**
 - 8.5.1. All requests for information will be assessed on their own merits and in accordance with the applicable legal principles and legislation.

- 8.5.2. Requests for information that are clearly frivolous or vexatious will be refused.
- 8.5.3. We will notify you in writing whether your request has been approved or denied within 30 calendar days after receiving your request. If we cannot find the record you asked for or it does not exist, we will notify you that it is not possible to give access to that record

9. PRESCRIBED FEES

9.1. Request Fees

Section 54 of PAIA entitles Amour Properties to request a fee to enable it to recover the costs of processing a request and providing access to records.

- 9.1.1. You must pay the prescribed fees before you are given access.
- 9.1.2. You will receive a notice from our information officer upon your request, setting out the application procedure.
- 9.1.3. The fee that the Requester must pay to a Private Body is R140.00. The Requester may lodge an application to the court against the tender or payment of the request fee.
- 9.1.4. These fees are set out in the Regulations relating to PAIA .

9.2. Access and Reproduction Fees

If access to a record is granted, the Requester may be required to pay an additional access fee for the search for and preparation of the record, and for the reproduction of the record.

- 9.2.1. This fee is for the time it takes us to handle your request, or if the time exceeds the prescribed hours to search and prepare the record for disclosure.
- 9.2.2. If the search for the record has been made, and the preparation of the record for disclosure, including any arrangement to make the record available as required in the request form, requires more than six hours, the Information Officer shall notify the Requester to pay as a deposit the prescribed portion of the access fee payable.
- 9.2.3. The Information Officer shall be entitled to withhold a record until the Requester has paid the required fee.
- 9.2.4. The access fee will provide for:
- the costs of making the record, or transcribing the record,
 - a postal fee (if applicable), and
 - the reasonable time we need to search for the record and prepare the record for you.
- 9.2.5. If a deposit has been paid in respect of a request for access that is refused, the Information Officer shall repay the deposit to the Requester within a reasonable period after access has been refused.

- 9.3. The forms and fee structure prescribed under PAIA are available from the Government Gazette, or at the website of the Information Regulator

9.4. Table of Fees

Item	Description	Amount
1	Request fee, payable by every requester	R140.00
2	Photocopy or printed black & white copy for every A4 page	R2.00 per page or part of the page
3	Printed copy of A4-size page	R2.00 per page or part of the page

4	For a copy in a computer-readable form on: - a flash drive (provided by the requester) - a compact disc (CD) if the requester provides the CD to us - a compact disc (CD) if we give the CD to the requester	R40.00 R40.00 R60.00
5	For a transcription of visual images, for an A4-size page or part of the page	Service to be outsourced. Will depend on quotation from Service provider.
6	For a copy of visual images	Service to be outsourced. Will depend on quotation from Service provider.
7	For a transcription of an audio record, per A4-size page	R24.00
8	- For a copy of an audio record on a flash drive (provided by the requester) - For a copy of an audio record on compact disc (CD) if the requester provides the CD to us - For a copy of an audio record on compact disc (CD) if we give the CD to the requester	R40.00 R40.00 R60.00
9	For each hour or part of an hour (excluding the first hour) reasonably required to search for, and prepare the record for disclosure	R145.00
	The search and preparation fee cannot exceed	R435.00
10	Deposit: if the search exceeds 6 hours	One-third of the amount per request. It is calculated in terms of items 2 to 8 above.
11	Postage, email or any other electronic transfer	Actual expense, if any.

10. GROUNDS FOR REFUSAL OF ACCESS TO RECORDS

We may have to refuse you access to certain records in terms of PAIA to protect:

- someone else's privacy,
- another company's commercial information,
- someone else's confidential information,
- research information,
- the safety of individuals and property,
- records privileged from production in legal proceedings

10.1. Requests that **must** be refused

Requests for access by a Requester must be refused by the Information Officer if:

- 10.1.1. the disclosure would involve the unreasonable disclosure of Personal Information about a third party (natural person), including a deceased individual;
- 10.1.2. the record contains:
 - 10.1.2.1. trade secrets of a third party;
 - 10.1.2.2. financial, commercial, scientific, or technical information, other than trade secrets, of a third party, the disclosure of which would be likely to cause harm to the commercial or financial interests of that third party;

- 10.1.2.3. information supplied in confidence by a third party, the disclosure of which could reasonably be expected to put that third party at a disadvantage in contractual or other negotiations, or prejudice that third party in commercial competition;
- 10.1.3. the disclosure of the record would constitute an action for breach of a duty of confidence owed to a third party in terms of an agreement;
- 10.1.4. the record is privileged from production in legal proceedings unless the person entitled to the privilege has waived the privilege or
- 10.1.5. the record contains information about research being or to be carried out by or on behalf of a third party, the disclosure of which would be likely to expose:
- 10.1.6. the third party;
- 10.1.7. a person that is or will be carrying out the research on behalf of the third party;
- 10.1.8. the subject matter of the research, to serious disadvantage.

10.2. **Requests that may be refused**

Requests for access by a Requester may be refused by the Information Officer if:

- 10.2.1. the disclosure would be likely to prejudice or impair:
 - 10.2.1.1. the security of:
 - 10.2.1.2. a building, structure, or system, including, but not limited to, a computer or communication system;
 - 10.2.1.3. a means of transport; or
 - 10.2.1.4. any other property;
 - 10.2.2. methods, systems, plans, or procedures for the protection of:
 - 10.2.2.1. an individual, in accordance with a witness protection scheme;
 - 10.2.2.2. the safety of the public, or any part of the public;
- 10.2.3. the security of property contemplated in subparagraph (i) (aa), (bb) or (cc) of section 66(b) of PAIA;
- 10.2.4. the record:
 - 10.2.4.1. contains trade secrets of the company;
 - 10.2.4.2. contains financial, commercial, scientific, or technical information, other than trade secrets, the disclosure of which would be likely to cause harm to the commercial or financial interests of the company;
- 10.2.5. contains information, the disclosure of which could reasonably be expected to:
 - 10.2.5.1. put the company at a disadvantage in contractual or other negotiations;
 - 10.2.5.2. prejudice the company in commercial competition; or
- 10.2.6. the record contains information about research being or to be carried out by or on behalf of the company, the disclosure of which would be likely to expose:
 - 10.2.6.1. the company;
 - 10.2.6.2. a person that is or will be carrying out the research of behalf of the company;
 - 10.2.6.3. the subject matter of the research, to serious disadvantage.

11. REMEDIES AVAILABLE ON ACCESS REFUSAL

- 11.1. The decision of the Information Officer or Deputy Information Officer is final.
- 11.2. Amour Properties does not have any internal appeal procedures that may be followed once a request to access information has been refused.
- 11.3. If the Requester is not satisfied with the outcome of their request, the Requester is entitled to lodge a complaint to the Information Regulator, and alternatively to a court of competent jurisdiction to take the matter further.

12. RECORDS THAT CAN NOT BE FOUND

If the company has searched for a record and believes that the record either does not exist or cannot be found,

- the Requester will be notified by way of an affidavit or written affirmation,
- which details the steps which were taken to locate the requested record

13. PROCESSING OF PERSONAL INFORMATION

13.1. Purpose of Processing Personal Information

The Company processes personal information for legitimate business purposes, including but not limited to:

- 13.1.1. Employment administration and human resource management.
- 13.1.2. Legal and regulatory compliance.
- 13.1.3. Financial administration and reporting.
- 13.1.4. Internal governance, audits and security controls.
- 13.1.5. For the purpose of business conducted in relation to Real Estate and the facilitation of the Sale, Purchase, Letting or Rental of property in service to its Customers and other stakeholders.
- 13.1.6. We process the personal information of various categories of people for various purposes. For further information please refer to our privacy policy on our website.

13.2. Categories of Data Subjects and Relating Personal Information

- 13.2.1. Data Subjects in respect of which Personal Information is Processed include customers of the company, contractors, suppliers, employees and candidates, and service providers.

13.3. Categories of Personal Information Collected

- 13.3.1. The company may collect all types of Personal Information, including Special Personal Information, relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person, including but not limited to:
 - 13.3.1.1. name, address (including proof of address), other contact details (including email addresses and telephone numbers), gender, marital status, date and place of birth, nationality, employer, job title, financial records and employment history, and family details, including their relationship to the Data Subject;
 - 13.3.1.2. identification numbers issued by government bodies or agencies, such as the Data Subject's identity number, passport number, tax identification number, driving licence number, and company registration number;

- 13.3.1.3. demographic information, such as the Data Subject's address, preferences, and interests; information relevant to the provision of products and services; information relevant to the procurement of products and services from suppliers;
- 13.3.1.4. bank account or payment card details, income, or other financial information;
- 13.3.1.5. information that the Data Subject provides to as part of it providing products and services to the Data Subject, which depends on the nature of the Data Subject's instructions to any agent or employee of the company;
- 13.3.1.6. Special Personal Information, including information about the Data Subject's health, racial or ethnic origin, political opinions, religious or philosophical beliefs and trade union membership; the Data Subject's genetic and biometric information; information about the Data Subject's sex life;
- 13.3.1.7. information the Data Subject provides to for the purposes of attending meetings and events, including dietary requirements which may reveal information about the Data Subject's health or religious beliefs;
- 13.3.1.8. identity data, contact data, and Special Personal Information from publicly available sources or third parties, service providers and the like, who conduct screening on any employee, customer, or service providers for anti-money laundering purposes.

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13.3.2. Examples of third parties from whom Personal Information is collected include:

- 13.3.2.1. other company affiliates;
- 13.3.2.2. customers when the company handles Personal Information on their behalf;
- 13.3.2.3. regulatory bodies;
- 13.3.2.4. credit reference agencies;
- 13.3.2.5. other companies providing services to the company; and
- 13.3.2.6. where the company makes use of publicly available sources of information.

13.4. **Categories of Recipients to whom Personal Information may be supplied**

13.4.1. We may share a Data Subject's Personal Information with affiliates, third parties engaged by the company, or business partners of the company, to assist in providing services to Data Subjects. Such affiliates, third parties, or business partners may include:

- 13.4.1.1. hosting, data storage, or archiving service providers;
- 13.4.1.2. payment processing service providers;
- 13.4.1.3. professional advisors; and
- 13.4.1.4. marketing, research, and advertising agencies.
- 13.4.1.5. required to disclose Personal Information in response to a court order, subpoena, civil discovery request, other legal process, or as otherwise required by law as per statutory authorities and/or the lawful order of any court or tribunal.
- 13.4.1.6. may disclose Personal Information when it believes disclosure is necessary to comply with the law, or to protect the rights, property, or safety of the company, its customers, or others.

13.4.2. We will comply with POPIA before transferring Personal Information to a third party who is not a contractor of the company.

- 13.4.3. Before transferring Personal Information to a third party contractor, such as an authorised service provider, the company will obtain assurances from the third party that it will process Personal Information in a manner consistent with POPIA.
- 13.4.4. Where the company learns that a third party contractor is using or disclosing Personal Information in a manner contrary to POPIA, the company will take reasonable steps to prevent such use or disclosure.
- 13.4.5. The company reserves the right to disclose and transfer a Data Subject's information, including their Personal Information, in connection with a corporate merger, consolidation, the sale of all of its membership interests and/or assets or other corporate change, including to any prospective purchasers.

13.5. Cross-border Transfers

- 13.5.1. In carrying out any cross-border transfers, the company may transfer a Data Subject's Personal Information to affiliates across South African borders.
- 13.5.2. This may happen if: the company's servers, suppliers, or service providers are based outside South Africa; services are hosted in systems or servers outside South Africa; or if a Data Subject uses the company's services while visiting countries outside South Africa.

13.6. Security

- 13.6.1. We secure data by maintaining reasonable measures to protect personal information from loss, misuse, and unauthorized access, disclosure, alteration, and destruction.
- 13.6.2. We also take reasonable steps to keep personal information accurate, current, complete, confidential, and reliable for its intended use.

14. AVAILABILITY OF THE MANUAL

- 14.1. This Manual is available for inspection by the general public upon request, during business hours and free of charge, at the offices of the company.
- 14.2. The Manual will be made available to the Information Regulator upon request.
- 14.3. Copies of this Manual may be made, subject to the prescribed fees.
- 14.4. This Manual is also posted on the website of the company.

15. UPDATING OF THE MANUAL

We will update this manual as required by law or if there are any material changes to our business offering.