Lew Geffen | Sotheby's INTERNATIONAL REALTY

PAIA Manual of a Private Body

Geffen International Realty Franchises (Pty) Limited ("GIRF")
Company Registration No: 1999/021/357/07
Registered Office: 366 Jan Smuts Avenue, Craighall
City of Johannesburg
Gauteng
2196
South Africa

PAIA ACCESS MANUAL

PAIA MANUAL

Prepared in terms of section 51 of the Promotion of Access to Information Act 2 of 2000 (As Amended)

Manual prepared in accordance with Section 51 of the Promotion of Access to Information Act, Act No 2 of 2002 and the Protection of Personal Information Act, Act 4 of 2013

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GEFFEN INTERNATIONAL REALTY FRANCHISES (PTY) LIMITED

Registration Number of Company: 1999/021357/07

T/A

LEW GEFFEN SOTHEBY'S INTERNATIONAL REALTY

MANUAL ON ACCESS TO INFORMATION

Issued in terms of Section 51 of the Promotion of Access to information Act 2 of 2000 in terms of (the "PAIA").

The Manual is made available in terms of Regulation R.187 of 15 February 2002 to PAIA and section 4 of the Regulations of the Promotion Of Access to Information Act 2 of 2000 (POPIA)

The manual is also available on our website: www.sothebysrealty.co.za.

This manual is available for inspection during office hours at the offices referred to in section 3

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1. OUR FIRM

Geffen International Realty Franchises (Pty) Limited ("GIRF") is the holder of the master license of the Sotheby's International Realty brand is South Africa. GIRF conducts a franchise and license grouping of independently owned real estate agencies under the name and style of Lew Geffen Sotheby's International Realty ('hereinafter 'us', 'we' or the 'firm').

The Franchisee's primary business is the listing, marketing, sale and letting of property within South Africa. The Franchisees are duly registered with the Property Practitioners Regulatory Authority and are private bodies for purposes of both the PAIA and POPIA. GIRF does not and does not plan to have transborder flows of information.

1.1 DEFINITIONS

1.1 "CEO" Chief Executive Officer;
1.2 "DIO" Deputy Information Officer;
1.3 "IO" Information Officer;
1.4 "Minister" Minister of Justice and Correctional Services;
1.5 "PAIA" Promotion of Access to Information Act No. 2 of 2000 (as Amended);
1.6 "POPIA" Protection of Personal Information Act No.4 of 2013;
1.7 "Regulator" Information Regulator;
1.8 "Republic" Republic of South Africa;
1.9 "Data" includes both personal information and other information;
1.10 "Data Subject" means the person to whom Personal Information relates;
1.11"Information Officer" means the head of a private body as contemplated in section 1;
1.12 "Minister" means the Cabinet member responsible for the administration of Justice;
1.13 "Personal Information" or "PI" means information relating to an identifiable, living natural person, and where it is applicable, an identifiable, existing juristic person including:

1.13.1 information relating to the race, gender, sex, pregnancy, marital status, national, ethnic or social origin, colour, sexual orientation, age, physical or mental health, well-being, disability, religion, conscience, belief, culture, language and birth of the person;

1.13.2 information relating to the education or the medical, financial, criminal or employment history of the person; any identifying number, symbol, e-mail address, physical address, telephone number or other assignment to the person;

1.13.3 the blood type or any other biometric information of the person;
the personal opinions, views or preferences of the person;

1.13.4 correspondence sent by the person that is implicitly or explicitly of a private or confidential nature or further correspondence that would reveal the contents of the original correspondence; the views or opinions of another individual about the person; and the name of the person if it appears with other Personal Information relating to the person or if the disclosure of the name itself would reveal information about the person.

1.13.5 Personal Information excludes information of about an individual who has been dead for more than 20 years (PAIA) and excludes information about a person who is dead (POPIA).

1.13. 6 “Private body” means:
a natural person who carries or has carried on any trade, business or profession, but only in such capacity;
a partnership which carries or has carried on any trade, business or profession; or
any former or existing juristic person but excludes a public body.

1.13.7 “Processing” means any operation or activity or any set of operations,
Whether by automatic means, concerning Personal Information, including:
the collection, receipt, recording, organisation, collation, storage, updating or modification, retrieval, alteration, consultation or use, dissemination by means of transmission, distribution or making available in any other form; or
merging, linking, as well as blocking, degradation, erasure or destruction of information.

1.13.8 “Public Body” Means:
Any department or state or administration in the national or provincial sphere of government or any municipality in the local sphere of government; or
Any other functionary or institution when-

- exercising a power of performing a duty in terms of the Constitution or a provincial constitution; or
- exercising a public power or performing a public function on terms of any legislation;

1.13.9 “Record” in relation to a private body means any recorded information r
regardless of form or medium in the possession or under the control of that public or
private body, respectively and whether it was created by the public or private body respectively.

1.13.10 “Responsible Party” or a public or private body or any other person which, alone or in conjunction with others, determines the purpose of and means for processing Personal Information

1.13.11 “Requester” means a person or legal persons seeking access to information

1.13.12 “Third Parties” means any natural or juristic person other than the Requester or, such party acting on behalf of the Requester or us.

2 PURPOSE OF PAIA MANUAL

This PAIA Manual is useful for the public to-

2.1 check the 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.

2.11 General description of Information Security Measures to be implemented by responsible party to ensure the confidentiality, integrity and availability of the information NB: Specify the nature of the security safeguards to be implemented or under implementation to ensure the confidentiality and integrity of the personal information under the care of the body. This includes GIRF’s Data Encryption; Antivirus and Anti-malware Solutions and two factor system authentication.

3. KEY CONTACT DETAILS FOR ACCESS TO INFORMATION OF THE GEFFEN INTERNATIONAL REALTY FRANCHISE (PTY) LIMITED ("GIRF") COMPANY REGISTRATION

Chief Information Officer: Mrs Yael Geffen (Chief Executive Officer)

Physical Address: 366 Jan Smuts Ave
Craighall, Randburg
Gauteng, South Africa
2196

Office hours: 08h00am – 16h30pm

E-mail: paiarequests@sothebys.co.za or yael@sothebysrealty.co.za

Telephone: +27 (0) 11 438 7300 / Ext 403

Website: www.sothebysrealty.co.za

Deputy Information Officer: Mr Jaco Smit

Physical Address: 366 Jan Smuts Ave
Craighall, Randburg
Gauteng, South Africa
2196

Office hours: 08h00am – 16h30pm

E-mail: paiarequests@sothebysrealty.co.za or jaco@sothebysrealty.co.za

Telephone: +27 (0) 11 438 7300 / Ext 407

Website: www.sothebysrealty.co.za

ACCESS TO INFORMATION GENERAL CONTACTS

E-mail:	paiarequests@sothebysrealty.co.za or jaco@sothebysrealty.co.za

National or Head Office Postal Address and Contact Details:

Postal Address:	366 Jan Smuts Ave Craighall, Randburg Gauteng, South Africa 2196
Physical Address:	366 Jan Smuts Ave Craighall, Randburg Gauteng, South Africa 2196
Telephone:	(0) 11 438 7300
Email:	info@sothebysrealty.co.za
Website:	www.sothebysrealty.co.za

4. GUIDE, DESCRIPTION OF THE GUIDE AND 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.

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

4.2. The aforesaid Guide contains the description of-

4.2.1. The objects of PAIA and POPIA;

4.2.2. The Information Officer of every public body, and every Deputy Information Officer of every public and private body designated in terms of section 17(1) of PAIA1 and section 56 of POPIA

4.2.3. The manner and form of a request for access to a record of a public body contemplated in section 113 and access to a record of a private body contemplated in

section 504

4.2.4. The assistance available from the IO of a public body in terms of PAIA and POPIA

4.2.4.1 The assistance available from the Regulator in terms of PAIA and POPIA

4.2.5. The postal and street address, phone and fax number and, if available, electronic mail address of the assistance available from the Regulator in terms of PAIA and POPIA;

4.2.6 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-

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.

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 access to that record is not refused in terms of any ground for refusal contemplated in Chapter 4.

5. A Private Body Internal Appeal; a complaint to the Regulator; and 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; the provisions of sections 145 and 516 requiring a public body and private body, respectively, to compile and access the manual, and how to obtain access to a manual; the provisions of sections 157 and 528 providing for the voluntary disclosure of categories of records by a public body and private body, respectively; the notices issued in terms of sections 229 and 5410 regarding fees to be paid in relation to requests for access; and the regulations made in terms of section 9211.

   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. 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. 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

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. 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. 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.

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."

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.

The Guide can also be obtained upon request to the Information Officer; or from the website of the Regulator (https://www.justice.gov.za/inforeg/).

A copy of the guide is also available in the following two official languages, for public inspection during normal office hours -

3.4.1 English
3.4.2 Afrikaans

5 THE ACT

a. 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 of the Requester. If a public body lodges a request, the public body must be acting in the public interest.

b. Requests in terms of the PAIA shall be made in accordance with the prescribed procedures and at the rates provided. The forms and tariffs are dealt with herein in later paragraphs.

c. Requesters are referred to the guideline on how to use the forms which is available here - https://inforegulator.org.za/wpcontent/uploads/2020/07/PAIA-Guide-English_20210905.pdf

5.1 The contact details of the Information Regulator are:

The contact details of the Information Regulator are:

Physical address:	54, Maxwell Drive, Woodmead, Johannesburg, 2191
Complaints email:	PAIAComplaints@inforegulator.org.za
General enquiries :	enquiries@inforegulator.org.za
Website:	https://inforegulator.org.za/

6 APPLICABLE LEGISLATION

The list of applicable legislation that affects our firm are listed below.

No	Ref	Act
1	No 71 of 2008	Companies Act
2	No 130 of 1993	Compensation for Occupational and Disease Act
3	No 55 of 1998	Employment Equity Act
4	No 95 of 1967	Income Tax Act
5	No 66 of 1995	Labour Relations Act
6	No 89 of 1991	Value Added Tax Act
7	No 37 of 2002	Financial Advisory and Intermediary Services Act
8	No 75 of 1997	Basic Conditions of Employment Act
9	No 69 of 1984	Close Corporations Act
10	No 25 of 2002	Electronic Communications and Transactions Act
11	No 2 of 2000	Promotion of Access to Information Act
12	No 63 of 2001	Unemployment Insurance Act
13	No 50 of 1999	Rental Housing Act
14	No 22 of 2019	Property Practitioners Act
15	No 38 of 2001	Financial Intelligence Centre Act
16	No 85 of 1993	Occupational Health and Safety Act
17	No 98 of 1987	Copyright Act
18	No 9 of 1999	Skills Development Act
18	No 68 of 2008	Consumer Protection Act

6.1 Information/records freely available on the GIRF website: www.sothebysrealty.co.za

- Geffen International Realty Franchises (Pty) Limited (Company) Profile.
- Property listing relating to properties for sale and to rent.
- News and press releases.
- Public information relating to purchasing of property and other real estate information.
- Annexure 1, Request for Access To A Record Of A Private Body
  (Section 53(1) of the Promotion of Access to Information Act, 2000
  (Act No. 2 of 2000) [Regulation 10]
- Annexure 1.1 Form 2 Request for Access To A Record. Form 2 Replaces Form C, In Annexure 1, [Regulation 7]
- Annexure 2, Appendix 3, Applicable Fees for Private Bodies
- Annexure 3, Categories of Data Subjects

7 SCHEDULE OF RECORDS

We hold records of required in terms of the below-listed legislation, which are not automatically accessible. If you require access to any of such records, you will need to follow the procedure set out in this manual.

- Company Documentation
- General correspondence
- Customer agreements: mandates, offer to purchases, sale agreements & lease agreements)
- Franchisees Customer database
- Client service records
- Dealer Franchise Agreements: Policy and Procedures
- Marketing and Communication: Field Records, Performance Records, Product Sales; Marketing Strategies
- Fidelity Fund Certificates: Current and Past.
- Financial records: Tax records (Company). Financial statements, Asset Register; Management Accounts and information,
- Financial Intelligence records: Client verification records submitted to the Financial Intelligence Centre)
- Legal records of legal matters
- Records relating to sale and/or letting of property
- Personnel files for current employees and franchisees
- Training records: Training material and manuals.
- Consumer Protection Act (68 of 2008)
- FICA (38 of 2001)
- Companies Act (71 of 2008)
- Electronic Communications and Transactions Act (25 of 2002)
- Property Practitioners Act 22 of 2019 (PPA)
- National Credit Act 34 of 2005 (NCA)
- Basic Conditions of Employment Act (75 of 1997)
- Rental Housing Act 50 of 1999
- Sectional Titles Schemes Management Act 8 of 2011 (STSMA)
- Community Schemes Ombud Service Act 9 of 2011 (CSOSA)
- Deeds Registries Act 47 of 1937
- Process of HR Documents (M29)
- Process Employment Agreements
- System Documents (As per the PAIA Act 4 of 2013)
- Passwords and Encrypted Information which is used by GIRF through a two factor authentication system and internal policies and procedures, which are used to ensure data and information is secure in the systems.

8 PROCEDURE TO REQUEST ACCESS TO RECORDS IN TERMS OF PAIA

A Requester must comply with all the procedural requirements as contained in section 53 of PAIA relating to a Request for Access to a Record.

A Requester must complete the prescribed Request for Access form (attached as Annexure 1) and submit the completed Request for Access form as well as payment of a request fee (if applicable) and a deposit (if applicable), to the Information Officer at the postal or physical address, facsimile number or electronic mail address stated in above.

The Request for Access form must be specific enough to enable the Information Officer to identify the following:
a) The Record/s requested;
b) The identity of the Requester;
c) The form of access that is required, if the request is granted;
d) The postal address or email address of the Requester; and
e) The right that the Requester is seeking to protect and an explanation as to why the Record is necessary to exercise or protect such a right.

We will process the Request for Access within 30 days of receipt of the Request for Access, unless the Request for Access is of such a nature that an extension of the prescribed time limit is necessitated in accordance with section 57 of PAIA.

If, in addition to a written reply from the Information Officer, the Requester wishes to be informed of the decision on the Request for Access in any other manner, the Requester must state the manner and the particulars so required.

If a Request for Access 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 reasonable satisfaction of the Information Officer

If an individual is unable to complete the prescribed form because of illiteracy or disability, such a person may make the request orally.

We will voluntarily provide the requested Records to a request for personal information by the data subject (as defined in section 1 of POPIA). The prescribed fee for reproduction of the Record requested by a Personal Requester will be charged in accordance with section 54(6) of PAIA.

9 FEES PAYABLE

The Act provides for two types of fees, namely:
a) A request fee, payable by a Requester (other than a request by the Data Subject) and
b) An access fee, which must be calculated by considering reproduction costs, search and preparation time and cost, as well as postage costs.
When the Request for Access is received by the Information Officer, the Information Officer will require the Requester, other than a Data Subject, to pay the prescribed request fee (if any), before further processing of the Request for Access.

If the search for a Record requires more than the prescribed hours for this purpose, the Information Officer shall notify the Requester to pay as a deposit, the prescribed portion of the access fee (being not more than one third) which would be payable if the Request for Access is granted.

The Information Officer shall withhold a Record until the Requester has paid the fees set out in Annexure 2.

A Requester whose Request for Access to a Record has been granted, must pay an access fee for reproduction and for search and preparation, and for any time reasonably required in excess of the prescribed hours to search for and prepare the Record for disclosure including making arrangements to make it available in a requested form provided for in section 29(2) (a) and (b)(i) and (ii) of PAIA.

If a deposit has been paid in respect of a Request for Access which is refused, the Information Officer must repay the deposit to the Requester

10 GROUNDS FOR REFUSAL OF ACCESS TO RECORDS IN TERMS OF PAIA

The following are the grounds on which our firm may, subject to the exceptions contained in Chapter 4 of PAIA, refuse a Request for Access.

1. Mandatory protection of the privacy of a third party who is a natural person, including a deceased person, where such disclosure of Personal Information would be unreasonable;
2. Mandatory protection of the commercial information of a third party, if the records contain:
    a) Trade secrets of that third party;
    b) Financial, commercial, scientific or technical information of the third party, the disclosure of which could likely cause harm to the financial or commercial interests of that third party; and/or
    c) Information disclosed in confidence by a third party to our firm, the disclosure of which could put that third party at a disadvantage in contractual or other negotiations or prejudice the third party in commercial competition.

3. Mandatory protection of confidential information of third parties if it is protected in terms of any agreement.
4. Mandatory protection of the safety of individuals and the protection of property.
5. Mandatory protection of records that would be regarded as privileged in legal proceedings.
6. Protection of the commercial information of our firm, which may include:
    a) Trade secrets;
    b) Financial/commercial, scientific or technical information, the disclosure of which could likely cause harm to the financial or commercial interests of our firm;
    c) Information which, if disclosed, could put our firm at a disadvantage in contractual or other negotiations or prejudice our firm in commercial competition; and/or
    d) Computer programs which are owned by our firm, and which are protected by copyright and intellectual property laws.
7. Research information of our firm, or a third party, if such disclosure would place the research or the researcher at a serious disadvantage; and
8. Requests for records that are clearly frivolous or vexatious, or which involve an unreasonable diversion of resources.

11 DECISION TO GRANT ACCESS TO RECORDS

We shall decide whether to grant or decline the Request for Access within 30 days of receipt of the Request for Access and must give notice to the Requester with reasons (if required) to that effect.

The period referred to above may be extended for a further period of not more than 30 days if the Request for Access is for a large number of Records or the Request for Access requires a search for Records held at another office of our firm, and the Records cannot reasonably be obtained within the original 30-day period.

We will notify the Requester in writing should an extension of time as be required.

12 REMEDIES AVAILABLE TO REQUESTOR IF PAIA REQUEST IS REFUSED

12.1 Internal remedies

We do not have internal appeal procedures. As such, the decision made by the Information Officer is final, and Requesters will have to exercise such external remedies at their disposal if the Request for Access is refused.

12.2 External remedies

In accordance with sections 56(3) (c) and 78 of PAIA, a Requester may apply to a court for relief within 180 days of notification of the decision for appropriate relief.

13 POPIA

The POPIA provides that data subjects have the right to know what personal information we have about them, what it is used for, recipients or categories of recipients, whether it is transferred overseas. These are set out in Annexure 3 hereto.

If you are a data subject you have the right to access personal information, object to the use of your Personal information and to request a deletion of correction of your records.

You also have a right to know what security measures we have in place.
For information on how to exercise these rights, contact our Information Officer at the numbers and/or email referred to in clause 2.

ANNEXURE 1

FORM C

REQUEST FOR ACCESS TO RECORD OF PRIVATE BODY
(Section 53(1) of the Promotion of Access to Information Act, 2000
(Act No. 2 of 2000)

[Regulation 10]

A. Particulars of private body

The Head:

_____

B. Particulars of person requesting access to the record

(a)	The particulars of the person who requests access to the record must be given below.
(b)	The address and/or fax number in the Republic to which the information is to be sent must be given.
(c)	Proof of the capacity in which the request is made, if applicable, must be attached.

Full names and surname: _____

Identity number:_____

Postal address: _____

Telephone number: _____

E-mail address: _____

Capacity in which request is made, when made on behalf of another person:

_____

C. Particulars of person on whose behalf request is made

This section must be completed *ONLY if* a request *for information is* made on behalf of *another* person.

Full names and surname: _____

Identity number: _____

_____

D. Particulars of record

(a)	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.
(b)	If the provided space is inadequate, please continue on a separate folio and attach it to this form. The requester must sign all the additional folios.

1 Description of record or relevant part of the record:

_____

2 Reference number, if available: _____

3 Any further particulars of record:

_____

E. Fees

a. A request for access to a record, other *than* a record containing personal information about yourself, will be processed only after a request fee has been paid.
b. You will be *notified of* the amount required to be paid as the request fee.
c. 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.
d. If you qualify for exemption *of* the payment *of* any fee, please state the reason for exemption.

Reason for exemption from payment of fees:

_____

F. Form of access to record

If you are prevented by a disability to read, view or listen to the record in the form of access provided for in 1 to 4 hereunder, state your disability and indicate in which form the record is required.

Disability:	Form in which record is required

Mark the appropriate box with an X.

NOTES:
(a) Compliance with your request in the specified form may depend on the form in which the record is available.

(b) Access in the form requested may be refused in certain circumstances. In such a case you will be informed if access will be granted in another form.

(c) The fee payable for access to the record, if any, will be determined partly by the form in which access is requested.

1. If the record is in written or printed form:			
	copy of record*		inspection of record
2. If record consists of visual images This includes photographs, slides, video recordings, computer-generated images,			

sketches, etc)					
	view the images		copy of the images"		transcription of the images*
3. If the record consists of recorded words or information which can be reproduced in sound:					
	listen to the soundtrack audio cassette		transcription of soundtrack* written or printed document		
4. If the record is held on computer or in an electronic or machine-readable form:					
	printed copy of record*		printed copy of information derived from the record"		copy in computer readable form* (stiffy or compact disc)

'If you requested a copy or transcription of a record (above), do you wish the copy or transcription to be posted to you? Postage is payable.	YES	NO

G Particulars of right to be exercised or protected

If the provided space is inadequate, please continue on a separate folio and attach it to this form. The requester must sign all the additional folios.

1. Indicate which right is to be exercised or protected:

_____

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

_____

H. Notice of decision regarding request for access

You will be notified in writing whether your request has been approved/denied. If you wish to be informed in another manner, please specify the manner and provide the necessary particulars to enable compliance with your request.

How would you prefer to be informed of the decision regarding your request for access to the record?

_____

Signed at…….. This…… day of ……..20

_____

_____

SIGNATURE OF REQUESTER / PERSON ON WHOSE BEHALF THE APPLICATION IS MADE

ANNEXURE 1.1

FORM 2 REQUEST FOR ACCESS TO RECORD

FORM 2 REPLACES FORM C IN ANNEXURE 1

REQUEST FOR ACCESS TO RECORD OF PRIVATE BODY
(Section 53(1) of the Promotion of Access to Information Act, 2000
(Act No. 2 of 2000)

[Regulation 7]

Annexure 3

Categories of Data Subjects	Types of personal information collected	Special Personal Information	Purposes for processing personal information	Recipients or categories of recipients of personal information	Trans-border information flow
Natural Person Customers	Names; contact details; physical and postal addresses; date of birth; ID number; Passport number; Tax related information; nationality; gender; confidential correspondence	n/a	Concluding contracts, performing in terms of the contract, marketing to customers, debt recovery, compliance with legislation	Internal use for customer management Data management company	N/a
Juristic Person Customers	Names of contact persons; Name of Legal Entity; Physical and Postal address and contact details; Financial information; Registration Number; Founding documents; Tax related information; authorised signatories, beneficiaries, ultimate beneficial owners.	n/a	Concluding contracts, performing in terms of the contract, marketing to customers, debt recovery, compliance with legislation	Internal use for customer management Data management company	n/a
Employees	Gender; Marital Status; Age; Home Language, Education information; Ethnicity, Criminal Staff administration Internal use n/a Financial Information; Employment History; ID number; Physical and Postal address;	Behaviour; well-being.	Complying with tax laws and other legislation	Human resources specialist services (South Africa)	

	contact details; Opinions.				
Suppliers' Natural person	Names; contact details; physical and postal addresses; date of birth; ID number; Passport number; Tax related information; nationality; gender; confidential correspondence	BBBEE status	Staff administration Procurement of goods	Internal use Compliance with laws	n/a
Suppliers' Juristic persons	Names of contact persons; Name of Legal Entity; Physical and Postal address and contact details; Financial information; Registration Number; Founding documents; Tax related information; authorised signatories, beneficiaries, ultimate beneficial owners	BBBEE status	Staff administration Procurement of goods	Internal use Compliance with laws	n/a

10. UPDATING OF THE MANUAL

The head of the private body being Geffen International Realty Franchise (Pty) Limited ("GIRF")
Company Registration No: 1999/021/357/07 will on a regular basis update this manual.

Issued by

Yael Geffen and Jaco Smit
_____ (Chief Executive Officer and Chief Information Officer)