

ONLY REALTY HOLDINGS (PTY) LTD

Registration Number: 2019/316114/07

PAIA MANUAL

Prepared in terms of section 51 of the Promotion of Access to Information Act (PAIA) 2 of 2000 (as amended), read with the Protection of Personal Information (POPI) Act, 2013

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1. INTRODUCTION

- 1.1 Only Realty Group (Pty) Ltd (hereafter "the Company") is a registered private company with limited liability duly incorporated under the laws of South Africa.
- 1.2 The Company specialises Properties (Real Estate) sales and rentals.
- 1.3 The Company is a Responsible Party of Protected Information and Special Protected Information (hereafter "Protected Information") as defined under the Protection of Personal Information Act 4 of 2013 (hereafter "POPIA").
- 1.4 The Company guarantees its commitment to protect a Data Subject's privacy whilst promoting the right to access Information. Balancing the right to information protection, access and transparency in accordance with the Republic of South Africa laws.
- 1.5 The 1996 South African Constitution, by providing a statutory right of access on request to any record held by the state as well as access to records held by private bodies, entrenches the fundamental right to access to information.
- 1.6 The Promotion of Access to Information Act 2 of 2000 ("PAIA"), which came into effect on 9 March 2001, seeks to advance the values of transparency and accountability in South Africa and provides the mechanism for requesters to exercise and protect their constitutional right to request access to a record.
- 1.7 PAIA establishes the following statutory rights of requesters to any record of a private body if:
 - That record is required for the exercise or protection of any of his or her legal rights;
 - That requester complies with all the procedural requirements; and
 - Access is not refused in terms of any ground referred to in the Act.
- 1.8 In terms of the PAIA, private bodies are required to publish a manual to assist requesters who wish to request access to a record.
- 1.9 This document serves as the Company's PAIA Manual ("the Manual") in accordance with the requirements of section 51 of the Act to facilitate access to records held by The Company.
- 1.10 A copy of this Manual is available to any person of the public in a PDF ("Portable Document Format") version on request from the Information Officer referred to in this Manual.
- 1.11 The Company endorses the spirit of the PAIA and believes that this Manual will assist requesters in exercising their rights.

1.12 In summary the Manual provides information on the:

- Contact details of the Information Officer;
- Structure and functions of Only Realty Holdings;
- Subjects and categories of records that are held by the Company; and
- Procedure that needs to be followed and criteria that must be met by a requester to request access to a record.

1.13 PAIA further provides that a requester is only entitled to access to a record if the record is required for the exercise or protection of a right. Only requests for access to a record, where the requester has satisfied the Information Officer that the record is required to exercise or protect a right, will be considered. A requester may act in different capacities in making a request for a record.

1.14 Requesters may make a request as:

- A personal requester who requests a record about him/herself;
- An agent requester who requests a record on behalf of someone else with that person's consent and where it is required for the protection of that person's legal right;
- A third-party requester who requests a record about someone else with that person's consent and where it is required for the protection of that person's legal right; and
- A public body who may request a record if:
 - It fulfils the requirements of procedural compliance;
 - The record is required for the exercise or protection of a right; and
 - No grounds for refusal exist.

1.15 The Company will protect the confidentiality of information provided to it by third parties, subject to the Company's obligations to disclose information in terms of any applicable law or a court order requiring disclosure of the information. If access is requested to a record that contains information about a third party, the Company is obliged to attempt to contact this third party to inform them of the request.

1.16 This enables the third party the opportunity of responding by either consenting to the access or by providing reasons why the access should be denied. In the event that the third-party furnishing reasons for the support or denial of access, the Information Officer will consider these reasons in determining whether access should be granted, or not.

1.17 SAHRC guidance to requesters on Sec 51 (1)(b)(i)

- The Information Regulator is required in terms of section 10 of PAIA to update and make available the existing guide that has been compiled by the South African Human Rights Commission (“SAHRC”) that contains information to assist a person wishing to exercise a right in terms of the Act and the Protection of Personal Information Act 4 of 2013 (“POPI Act”) for requesters. It contains information to assist a person wishing to exercise a right in terms of the Act.
- The SAHRC guide is available from the SAHRC website at: www.sahrc.org.za (see paragraph 8 below, for more information).

2. OBJECTIVE:

This PAIA Manual aims to create a compliance framework to:

- 2.1. Promote the lawful accessing of Information
- 2.2. Helping you understand what Information we hold.
- 2.3. Setting out what our responsibilities and obligations are towards the Information under our control.
- 2.4. Helping you understand what rights and remedies you have to access Information under our control.
- 2.5. To adhere to the legal requirements of the laws of the Republic of South Africa.
- 2.6. To align policies and processes with the ISO9001:2015 standard.
- 2.7. To outline the Company's policy on the principles, procedure and management of Information and the access thereto.

3. DEFINITIONS

- 3.1 **Company** refers to Only Realty Holdings (Pty) LTD with Registration Number 2019/316114/07.
- 3.2 **Data Subject** means the natural or juristic person to whom the Protected Information relates. This specifically includes any buyer, seller, of property, as well as Lessors and Lessee’s.
- 3.3 **DIO** refers to the Deputy Information Officer as appointed by the Company from time to time as contemplated in Section 17 of the Promotion of Access to Information Act

- 3.4 **IO** means the Information Officer of the Company, being an individual that is part of the executive management of the Company as contemplated in Section 1 of the Promotion of Access to Information Act.
- 3.5 **PAIA** means the Promotion of Access to Information Act No. 2 of 2000.
- 3.6 **POPIA** means the Protection of Personal Information Act, No. 4 of 2013.
- 3.7 **Personal Information** means Information relating to an unidentifiable, living, natural person, or an identifiable, existing juristic person, as defined in Section 1 of POPIA.
- 3.8 **Requester or Recipient** refers to an individual or Company requesting access to Information under the control of the Company.

4 SCOPE

- 4.1 This Manual has been prepared in respect of the Company.
- 4.2 The scope of this Manual will exclude the Company operations outside South Africa and will serve to provide a reference regarding the records held by the Company at its Registered Office and various operations.
- 4.3 The Company forms part of a Group of Companies, whom all forms part of the larger Only Realty Holdings.
- 4.4 The Only Realty Holdings includes the following Companies:
 - 4.4.1 Airscape(Pty) Ltd – Resistration number: 2019/232117/07
 - 4.4.2 Bondspark (Pty) Ltd – Registration number: 2018/48806107
 - 4.4.3 Only Realty Group (Pty) Ltd – Registration number: 2013/146338/07
 - 4.4.4 Dune Day (Pty) Ltd - Registration number: 2020/791357/07
 - 4.4.5 Only Realty Development and Commercial – Registration number:2018/389232/07
 - 4.4.6 Vermillion (Pty) Ltd 0 Registration number: 2017/029822/07
- 4.5 Currently the only Director for Only Realty Holdings is:
 - 4.5.1 Grant Smee
- 4.6 The Company does have an Executive team who is assisting the Director with Company Management. The Company Organogram is attached to this manual and marked as “Annexure “CO”

5 PAIA MANUAL PURPOSE

This PAIA Manual is published to help the public:

- 5.1 Check the categories of records held by the Company which are available to the requester without having to submit a formal PAIA request.
- 5.2 Understand the process set out to request access to a record of the Company, by providing a description of the subjects on which the Company holds records and the categories of records held on each subject.
- 5.3 Understand the description of the records of the Company which are available in accordance with any other legislation.
- 5.4 Access all the relevant contact details of the Information Officer and Deputy Information Officer who will assist the Requester with the records they intend to access.
- 5.5 Understand what resources are at their disposal, e.g. PAIA Guide that was published by the Regulator, and promote access thereto.
- 5.6 Understand what Personal Information the Company processes, the purpose of the processing.
- 5.7 Understand the description of the categories of Data Subjects and the Information or categories of information relating thereto.
- 5.8 Understand the Recipients or categories of Recipients to whom the Personal Information may be supplied.
- 5.9 Know if the Company 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.
- 5.10 Know whether the Company has appropriate security measures to ensure the confidentiality, integrity and availability of the Personal Information which is to be processed.

6 CONTACT DETAILS FOR ACCESS TO INFORMATION

6.1 Chief Information Officer:

Name:	Claudia Rodrigues
Telephone Number	082 679 2523
E-mail Address:	claudia@orpg.co.za
Position	Group Finance

6.2 Deputy Information Officer:

Name	Rene Navisotschnig
Telephone Number	076 894 9415
Email Address	rene@orpg.co.za
Position	Executive Support

6.3 Access to information general contacts:

Name	Paula Davies
Telephone Number	083 556 3556
E-mail Address	Paula.davies@orpg.co.za
Position	Group Operations

6.4 National or Head Office – Cape Town:

Company Name	ONLY REALTY HOLDINGS
Office Number	UNIT 3
Physical Address	37 BLAAUWBERG ROAD, TABLE VIEW, 7441
Website	WWW.ONLYREALTY.CO.ZA

6.5 Johannesburg Office:

Physical Address	Block C, Investment Place, 111 10 th road, Hyde Park, Sandton
Responsible person	Paula Davies
Telephone number	083 556 3556

7 PAIA

7.1 PAIA 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.

7.2 Requests in terms of PAIA shall be made in accordance with the prescribed procedures, at the rates provided. The forms and tariff are dealt with in paragraphs 6 and 7.

7.3 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. The Guide is available from the Information Regulator.

7.4 The contact details of the Commission are:

Postal Address: Private Bag 2700, Houghton, 2041

Telephone Number: +27-11-877 3600

Fax Number: +27-11-403 0625

Website: www.inforegulator.co.za

8 PAIA GUIDE

8.1 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.

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

8.3 The aforesaid Guide contains the description of-

8.3.1 The objects of PAIA and POPIA;

8.3.2 The postal and street address, phone and fax number and, if available, electronic mail address of-

8.3.2.1 The Information Officer of every public body, and

8.3.2.2 Every Deputy Information Officer of every public and private body designated in terms of section 17(1) of PAIA¹ and section 56 of POPIA²;

8.3.3 The manner and form of a request for-

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.*

- 8.3.3.1 Access to a record of a public body contemplated in section 11³;
and
- 8.3.3.2 Access to a record of a private body contemplated in section 50⁴;
- 8.3.4 The assistance available from the IO of a public body in terms of PAIA and POPIA;
- 8.3.5 The assistance available from the Regulator in terms of PAIA and POPIA;
- 8.3.6 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-
 - 8.3.6.1 An internal appeal;
 - 8.3.6.2 A complaint to the Regulator; and
 - 8.3.6.3 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;
- 8.3.7 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;
- 8.3.8 The provisions of sections 15⁷ and 52⁸ providing for the voluntary disclosure of categories of records by a public body and private body, respectively;

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

- 8.3.9 The notices issued in terms of sections 22⁹ and 54¹⁰ regarding fees to be paid in relation to requests for access; and
- 8.3.10 The regulations made in terms of section 92¹¹.
- 8.4 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.
- 8.5 The Guide can also be obtained-
- 8.5.1 Upon request to the information officer;
- 8.5.2 From the website of the Regulator (<https://www.justice.gov.za/inforeg/>).
- 8.5.3 A copy of the Guide is also available in the following two official languages, for public inspection during normal office hours- Afrikaans | English | Zulu

9 CATEGORIES OF RECORDS

We hold the following subjects and categories of records:

- 9.1 Company Records:
- 9.2 Legal Records
- 9.3 Business Records
- 9.4 Financial Records
- 9.5 Insurance Records
- 9.6 Income Tax Records
- 9.7 Personnel Records
- 9.8 Policies and Directives

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.”

9.9 Agreements or Contracts

9.10 Regulatory Documents

9.11 Published Information

9.12 Customer Information

9.13 Supplier Information

9.14 Property details

9.15 All information related to sale and lease of property.

10. RECORDS AUTOMATICALLY AVAILABLE

We hold various subjects and categories of records in electronic or physical form that are available automatically or in other ways.

Category of Records	Types of the Record	Automatically Available on
Company Records	Memorandum of Incorporation	CIPC
	Directors' names	CIPC
	Documents of Incorporation	CIPC
	Appointed Auditors & Accountants	CIPC
Published Information	Brochures /Product Sales & Marketing Information	Website / Social Media pages
	External newsletters and circulars available	Website / Social Media
	Case Studies Videos Property descriptions Agent details	Website / Social Media
Policies and Directives	Website Terms & Conditions	Website

	Privacy Policy	Website
	PAIA Manual	Website
	POPI Policy	Website

11. RECORDS AVAILABLE ON REQUEST

The Only Realty Holdings has in its possession the following categories of records on the subject matters referred to hereunder and for which a request for access needs to be made in terms of the Act:

Category of Records	Subject of the Record
Company Records	Minutes of the board of directors meetings
	Written resolutions
	Records relating to the appointment of directors, auditors, secretaries, public officers, or other officers
	Share register and other statutory registers
	Other statutory records
	List of subsidiary companies, associates, joint ventures and all Companies that forms part of the Group of Companies
Legal Records	Litigation Records
Business Records	Business records include any documents that have economic value to the business.
	Operational records
	Databases
	Published works
	Internal correspondence
	Analyst presentations
	Corporate mission statement
Internal Reports and Communications	
Financial Records	Financial records are all our records related to our finances.
	Financial statements

	Tax records and returns
	Other documents relating to taxation of the Company
	Accounting records
	Auditor reports
	Financial reports
	Banking records
	Banking details
	Bank statements
	Electronic banking records
	Asset register
	Quotes and invoices
	Financial agreements
Insurance Records	Insurance records are all our records related to our insurable assets. Including Insurance policies held by the company and records of insurance claims.
Taxation Records	Income tax records are all our records related to our income tax obligations
	PAYE Records
	Corporate tax records
	Documents issued to employees for income tax purposes
	Records of payments made to SARS on behalf of employees
	VAT records
	Skills Development Levies
	UIF
	Workmen's Compensation
Personnel Records	Personnel records are all our records about anyone who works for us, provides services to us, or provides services on our behalf and who receives or is entitled to receive remuneration,

	including our employees, contractors, and other personnel.
	List of employees
	Employee personal information
	Employee employment contracts
	Employee benefit records
	Employment applications and appointment documents
	Employment policies and procedures
	Employment Equity Plan and related records
	Health and safety records
	Salaries or wages of employees
	Leave records
	Internal evaluations and performance records
	Disciplinary records
	Disciplinary codes
	Training records
	Operating manuals
	Personal records provided by personnel
	Other statutory records
	Related correspondence
Policies and Directives	Policies and directives include both internal and external documents.
	Internal relating to employees and the Company
	External relating to clients and other third parties
Agreements or Contracts	Standard agreements with client (Rental agreements and Sale agreements and Joint Venture Agreements)
	Contracts concluded with customers (including offers to purchase)
	NDA's
	Letters of Intent, MOUs
	Other third-party contracts

	Bond agreements, Rental agreements, Supplier agreements and/or service contracts
Regulatory Documents	Regulatory documents include any documents required to comply with any laws.
	Permits
	Licences
	Reports, logs and service records
Customer Information	Customer information includes any information about anyone that we provide goods or services to, including our customers, leads, or prospects.
	Customer details, required as per FICA
	Contact details of individuals within customers
	Communications with customers and sales records Transactional information Marketing records
Supplier Information	Supplier Company Information Agreements, Terms & Conditions

12. RECORDS AVAILABLE IN ACCORDANCE WITH ANY OTHER LEGISLATION

We hold records for the purposes of PAIA in terms of the following main laws, among others:

- Basic Conditions of Employment Act 75 of 1997
- Broad Based Black Economic Empowerment Act 53 of 2003
- Companies Act 61 of 1973
- Companies Act 71 of 2008
- Compensation for Occupational Injuries and Disease Act 130 of 1993
- Competition Act 89 of 1998
- Consumer Protection Act 68 of 2008
- Copyright Act 98 of 1978
- Customs and Excise Act No 91 of 1964
- Electronic Communications Act 36 of 2005
- Electronic Communications and Transactions Act 25 of 2002
- Employment Equity Act 55 of 1998
- Employment Tax Incentive Act 26 of 2013

- Financial Intelligence Centre Act 38 of 2001
- Income Tax Act 58 of 1962
- Insolvency Act No 24 of 1936
- Intellectual Property Laws Amendment Act, No 38 of 1997
- Intellectual Property Laws Amendment Act, No 28 of 2013
- Labour Relations Act 66 of 1995
- National Credit Act 34 of 2005
- Occupational Health and Safety Act 85 of 1993
- Prescription Act 18 of 1943
- Prevention & Combating of Corrupt Activities Act 12 of 2004
- Prevention of Constitutional Democracy Against Terrorist & Related Activities Act 33 of 2004
- Prevention of Organised Crime Act 121 of 1998
- Promotion of Equality and Prevention of Unfair Discrimination Act 4 of 2000
- Protected Disclosures Act 26 of 2000
- Promotion of Access to Information Act, No 2 of 2000
- Property Practitioners Act 22 of 2019
- Protection of Constitutional Democracy against Terrorist and Related Activities Act 33 of 2004
- Protection of Personal Information Act 4 of 2013
- Regulation of Interception of Communications and Provision of Communication related Information Act 70 of 2002
- Skills Development Act 97 of 1998
- Skills Development Levies Act 9 of 1999
- Tax Administration Act 28 of 2011
- Trade Marks Act 194 of 1993
- Unemployment Contributions Act 4 of 2002
- Unemployment Insurance Act 63 of 2001
- Unemployment Insurance Contributions Act 4 of 2002
- Value Added Tax Act 89 of 1991
- Waste Management Act, 59 of 2008
- Air Quality Act, 39 of 2004

13. PROCESSING JUSTIFICATION

The Processing of Personal Information is done for the purpose of:

- 13.1 Promoting our legitimate business interests, including but not limited to managing, operating or promoting the Company;
- 13.2 Performing such administrative and business functions as required to fulfil our contractual obligations to Clients;
- 13.3 Internal and external reporting as may be required;
- 13.4 In compliance with or to fulfil a legal obligation, whether contractually or otherwise.
- 13.5 To protect the vital interests of any individual or Client;
- 13.6 Limiting liability for ourselves, our parent companies, subsidiaries, Clients or third parties, and all other entities that fall within the Group of Companies;
- 13.7 Administration of agreements;
- 13.8 Assisting Clients with buyin and selling of properties;
- 13.9 Assisting clients with Property rentals;
- 13.10 Providing other products and services to Clients;
- 13.11 Detecting and prevention of fraud, crime, money laundering and other malpractice, with strict Compliance to FICA;
- 13.12 In connection with legal proceedings;
- 13.13 Staff administration and employment legislation compliance;
- 13.14 Keeping of accounts and records;
- 13.15 Complying with legal and regulatory requirements.

14. CATEGORIES OF DATA SUBJECTS AND INFORMATION RELATING THERETO

Data Subjects	Information Categories	Information Processed
Customers / Clients	Customer Credit Application – Cloud Based (“Prop data” and	Company Name, Trading Name, Company Registration Number, VAT details, Nature of Business & Industry, Address, Contact Details, Company

Data Subjects	Information Categories	Information Processed
	“we connect you”	representative Information, Bank Account Details, Authorised signee details, Trade References.
	Client Prebid Review & Risk	FICA, Illicit activity, Corruption, Fraud, Monopoly, Collusion, Tax evasion or money laundering, World bank review.
	Sale/Rental Administration	Offer to Purchase, Sales agreement, Rental Mandate
Service Providers	Supplier Agreements & Tenders	Client File, Price, Agreement Terms.
	Approved Suppliers - Supplier Onboarding / Due Diligence	Name of the legal entity, Names of contact persons, Physical and Postal address, Contact details, Registration number, Company Incorporation Documents, Tax & VAT related information, Banking Details, Ultimate beneficial owners; Shareholding information, BBBEE information, Contractual Terms between parties.
Employees	Employees Onboarding Records [Natural Persons]	Full employee file, which includes inter alia the following Information: Appointment Letter, Inc. salary & benefits, Information on designation and duties, Name & Surname, Email / Telephone, Emergency contact details, Gender, Bank Authorisation Form, Beneficiary Nomination, Marital status, Colour, Race, Age, Language, Education information, Financial Information, Employment history, ID number, Physical and Postal

Data Subjects	Information Categories	Information Processed
		address, Contact details, Opinions, Occupational Health and Safety and other medical Information in the form of medical certificates from registered medical practitioners, Criminal Record, UIF, PAYE, Income Tax, Biometric Data, Union Membership.
	Employee Reference Check	Credit Check, Criminal, Educational, Empowerment, Disability, Fraud.
	Medical Assessment	Medical Examination Form, Pre Medical, Annual Medical Monitoring, All Medical Conditions & Info.
	Employee Training & Skills Assessment	Workplace Skills Development Plan: Name & Surname, ID, BEE, Disability, Designation, Skills Level, Training Required.
	Disciplinary Record	Full Employee Record of each Employee specifying the nature of any disciplinary transgressions (Charge), the actions taken by the Employer and the reasons for the actions, including CCMA and Labour Court referrals.
	Name & Surname, Designation, Start Date,	Name & Surname, Designation, Start Date,
	Employee Payroll & Memberships	Wage Information, Banking Details, Attendance/leave, Biometric Data, Tax Information, Union membership, Leave.

15. SHARING OF INFORMATION

The Company shares Information with the following bodies as required by legal or operational requirements:

Category of Personal Information	Recipients or Categories of Recipients to whom the Personal Information may be supplied
Identity number and names, for criminal checks	South African Police Services
Credit and payment history, for credit information	Credit Bureaus: Experian
All Tax-related Information, Invoices and Financial Statements	The South African Revenue Service
Industrial Relation Stats	The Department of Employment and Labour
Employee Information and Payments	The Unemployment Insurance Fund
Employee department, Designation, bank details, attendance record, wage rate, memberships and deductions	Payroll Administrators
Information as and when required for litigation or mitigation purposes. Information related to property transfers and drafting legal contracts.	Legal Counsel / Attorneys / CCMA
Invoices, wage slips and all such related financial information as may be requested.	Auditors
Member Information, Contributions and Fund Claims	Medical Aid (if a member)

Category of Personal Information	Recipients or Categories of Recipients to whom the Personal Information may be supplied
Member Information & Contributions	Trade Unions (if affiliated)
Information which regulates Property Practitioners, which is regulated by the PPA	PPA, Members and public requesting same.

16. CROSS BORDER FLOW

16.1 Protected Information may be shared with all Companies which forms part of Only Realty Holdings as per paragraph 4 above and/or some of its branches, which includes it's Maritius branch.

16.2 It is noted that some of the group affiliates and/or third-party service providers may be situated outside of the Republic of South Africa or be from a region with a legal restriction on international data transfers. Should cross border transfers be made, the Company shall ensure that such transfers are guided by contractual clauses that contractually require a level of data protection.

17. SECURITY PROTOCOLS

Information Security Measures to be implemented to ensure the confidentiality, integrity and availability of the Information, includes:

17.1 The Company shall employ and only contract with 3rd Party Service providers that implement industry-grade technology and security principles.

17.2 The Company shall endeavour to do all that is reasonably possible to ensure the confidentiality, integrity and availability of the Protected Information under its care.

17.3 Measures shall include the implementation of:

17.3.1 Computer Firewalls;

17.3.2 Virus protection software and update protocols;

17.3.3 Logical and physical access control;

17.3.4 Secure setup of hardware and software making up the IT infrastructure;

17.3.5 Off-site storage of all electronic back-ups;

17.3.6 Compliance with such Health and Safety protocols, as required by law.

18 HOW TO REQUEST ACCESS

18.1 Any request for access to records should be submitted on the prescribed form C (a copy of which is attached) which should be sent to the Group Information Officer whose name and address details appear in paragraph 6 hereof.

18.2 The form is also available on the Information Regulator's website at https://www.justice.gov.za/forms/paia/J752_paia_Form%20C.pdf.

18.3 This form should also accompany Form 1 "Request for Access form", which is attached hereto as "Annexure B".

18.4 Please submit the completed forms to our information officer together with the relevant request fee (please refer to paragraph 19 hereof).

18.5 Please ensure that:

- The forms are correctly completed, with all lines and spaces attended to.
- Proof of the identity, in the form of a copy of the applicant's identity document, is submitted with the application.
- If the applicant is a legal entity, that a written resolution or duly signed authority is attached.
- The form is completed in type or print format, in a clear eligible manner.
- If a question does not apply, indicate so by inserting "N/A" in response to that question, and if there is nothing to disclose in response to a particular question, write "NIL" in response thereto.
- If there is insufficient space in the form, add additional folios on which the additional Information is provided, clearly indicating to which question this relates.
- Your request has enough Information for the Information Officer to identify the records to which you request access and which form of access you require;
- You provide your correct contact details to enable the IO to make contact.
- You provide proof of the capacity in which you are making the request if you are making it on behalf of someone else, please attach such authorisations.

18.6 If you do not use the standard form or complete it as required, we may:

- Reject the request due to lack of procedural compliance;
- Refuse it if you do not provide sufficient Information; or
- Delay it.

18.7 Please note that the correct completion and submission of a Request for Access form does not automatically entitle or allow the applicant access to the requested record. An application for access to a record is subject to certain limitations, and the discretion of the Information Officer of the Company, as set out in paragraph 20 and 21 hereof.

19 HOW MUCH IT WILL COST YOU

19.1 You will be requested to pay the prescribed fee as required by law when submitting a request for access to Information.

19.2 The prescribed fees are as set out in the Fee Schedule, Form 3 which is available here: <https://inforegulator.org.za/wp-content/uploads/2020/07/Form-3-PAIA.pdf>

19.3 A requestor is required to pay the prescribed fees before a request is processed.

19.4 If the preparation of the record requested requires more than the prescribed hours (six), a deposit shall be paid (of not more than one-third of the access fee, which would be payable if the request were granted).

19.5 A Requester may lodge an application with a court against the tender/payment of the request fee and/or deposit.

19.6 Records may be withheld until the fees have been paid.

20 DECISION ON REQUEST

The applicant will be informed whether or not the application for access has been denied, or granted. In the event that the application is refused, the applicant will be given adequate reasons for the refusal and will be informed that the applicant may lodge an application with the Information Regulator to review the refusal of the application, as well as the procedure (including the period) for lodging such application.

21 GROUNDS FOR REFUSAL

21.1 The Company may legitimately refuse to grant access to a requested record that falls within a certain category. Grounds on which the Company may refuse access include:

21.2 Protecting Protected Information that the Company holds about a third person (who is a natural person), including a deceased person, from unreasonable disclosure;

- 21.3 Protecting commercial Information that the Company holds about a third party or the Company (for example, trade secret: financial, commercial, scientific or technical Information that may harm the commercial or financial interests of the organisation or the third party);
- 21.4 If disclosure of the record would result in a breach of a duty of confidence owed to a third party in terms of an agreement;
- 21.5 If disclosure of the record would endanger the life or physical safety of an individual;
- 21.6 If disclosure of the record would prejudice or impair the security of property or means of transport;
- 21.7 If disclosure of the record would prejudice or impair the protection of a person in accordance with a witness protection scheme;
- 21.8 If disclosure of the record would prejudice or impair the protection of the safety of the public;
- 21.9 The record is privileged from production in legal proceedings unless the legal privilege has been waived;
- 21.10 Disclosure of the record (containing trade secrets, financial, commercial, scientific, or technical Information) would harm the commercial or financial interests of the Company;
- 21.11 Disclosure of the record would put the Company at a disadvantage in contractual or other negotiations or prejudice it in commercial competition;
- 21.12 The record is a computer programme; and
- 21.13 The record contains Information about research being carried out or about to be carried out on behalf of a third party or the Company.

22 RECORDS THAT CANNOT BE FOUND OR DO NOT EXIST

If the Information Officer has searched for a record and it is believed that the record either does not exist or cannot be found, the Requester will be notified by way of an affidavit or affirmation. This will include the steps that were taken to try and locate the record.

23 THIRD PARTY INFORMATION

If access is requested to a record containing information about a third party, the Company is obliged to contact this third party to inform them of the request. This enables

the third party the opportunity of responding by either consenting to the access or by providing reasons why the access should be denied. In the event of the third party furnishing reasons for the support or denial of access, our designated Information Officer will consider these reasons in determining whether access should be granted or not.

24 AVAILABILITY OF THE MANUAL

A copy of the manual is available-

24.1 On our website at www.onlyrealty.co.za

24.1 Head office of in Cape town (see paragraph 6 above), for inspection during normal business hours;

24.2 The Company office in Johannesburg (see paragraph 6 above), for inspection during normal business hours;

24.3 To any person upon request and upon the payment of a reasonable prescribed fee; and

24.4 To the information regulator upon request.

24.2 A fee for a copy of the manual, as contemplated in annexure b of the regulations, shall be payable per each A4-size photocopy made.

25 UPDATING OF THE MANUAL

The Company Information Officer will be responsible for reviewing this manual annually and when substantial changes are affected to the Promotion of Access to Information Act or such related Act that may influence this manual.

FORM C: REQUEST FOR ACCESS TO RECORD OF PRIVATE BODY

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:

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.....
.....
.....

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:

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.....

FORM C: REQUEST FOR ACCESS TO RECORD OF PRIVATE BODY
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 below, 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 for access 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 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 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
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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:

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ANNEXURE B: REQUEST FOR ACCESS FROM - POPIA

ONLY REALTY HOLDINGS (PTY) LTD
SUBJECT ACCESS REQUEST FORM

Important Information

Only Realty Holdings (Pty) Ltd, collects, holds, and processes certain personal information about our customers, suppliers, buyers, sellers, lessors, lessees and employees (“data subjects”). As a data subject, you have a legal right, under the Protection of Information Act to find out about our use of your personal information as follows:

- Confirmation that your personal information is being processed by us;
- Access to your personal information;
- How we use your personal information and why;
- Details of any sharing or transfers of your personal information;
- How long we hold your personal information;
- Details of your rights under the Protection of Information Act including, but not limited to, your rights to withdraw your consent to our use of your personal information at any time and/or to object to our processing of it.

No fee is payable under normal circumstances. We reserve the right to charge a reasonable fee for requests that are manifestly unfounded, excessive, or repetitive. Such charges will be based only on the administrative cost that we will incur in order to respond.

Please complete the required information and return it to us by email addressed to:

Information Officer: Claudia Rodrigues

Email address: claudia@orpg.co.za

After receiving your subject access request, we may contact you to request additional supporting information and/or proof of your identity. This helps us to safeguard your privacy and personal information.

We will respond to all data subject access requests within one month of receipt and will aim to provide all required information to you within the same period. If we require further proof of ID, or if your request is unusually complicated, we may require more time and will inform you accordingly.

ONLY REALTY HOLDINGS (PTY) LTD
SUBJECT ACCESS REQUEST FROM – FROM 1

Your Details

Title:	
Name(s):	
Surname:	
Address:	
Telephone Number:	
Email Address:	

Information Being Requested

Please provide specific details (along with any relevant dates) of the information being requested and any additional information that may help us to locate your personal information and to confirm your identity.

By completing this form, you are making a subject access request under the Protection of Personal Information Act for personal information collected, processed, and held about you by us that you are entitled to receive.

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What outcome do you want pertaining to the information requested above?

Purpose	Tick if applicable
Nothing, I just want to know what Personal Information you have of me under your control.	
I want to object against the processing of my Personal Information for the following reasons (provide detailed information / substantiate your request and if necessary attach additional information to this document)::	
I want to request the correction of my Personal Information for the following reasons (provide detailed information / substantiate your request and if necessary attach additional information to this document):	

I want you to delete or destroy my Personal Information for the following reasons (provide detailed information / substantiate your request and if necessary attach additional information to this document)::	

Declaration

By signing below, you confirm that you are the data subject named in this Subject Access Request Form. You warrant that you are the individual named and will fully indemnify the Company for all losses and expenses incurred if you are not. We cannot accept requests in respect of your personal information from anyone else, including members of your family.

Name:	
Signature:	
Date:	

