



PAIA & POPI POLICY **MANUAL**

**JOHANNESBURG PROPERTY
SERVICES (PTY) LTD**

(REG NO. 1989/002734/07)

SECTION 51 MANUAL

IN TERMS OF

**THE PROMOTION OF ACCESS TO INFORMATION ACT 2 OF
2000 (PAIA)**

INCORPORATING ADDITIONAL REQUIREMENTS OF

**THE PROTECTION OF PERSONAL INFORMATION ACT 4 OF
2013 (POPI)**

FOR

**JOHANNESBURG PROPERTY SERVICES (PTY) LTD “JPS”
PROPERTY MANAGEMENT SPECIALISTS**

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JOHANNESBURG PROPERTY SERVICES (JPS) was founded in 1989 and we currently administer a balanced portfolio of retail, commercial, residential and Body Corporates. We have sixty buildings, four of which are Body Corporates. JPS is dedicated to providing a comprehensive and tailored property management service. We have over 36 years' experience and continually strive to add value to our client's property assets. We have a Trust Account, are registered with the Property Practitioners Regulatory Authority (PPRA), hold Fidelity Fund Certificates and are audited every year by Tuffias Sandberg Auditors.

Services offered by JPS include:

- Sourcing of tenants**
- Preparing lease agreements**
- Inspecting properties Collecting rentals**
- Dealing with tenant queries**
- Arranging for repairs and maintenance**
- Paying of all approved expenses**
- Monitoring City of Johannesburg Municipal accounts**
- Dealing with all legal aspects of tenancy**
- Supervising contractors**
- Paying over of surplus funds to owners at month-end**

Our knowledge, drive, determination and experience in property management ensures our continued success. Other factors that ensure our success include:

- **Our dynamic and forward thinking**
- **Our marketing and advertising departments**
- **Our ability to match individual requirements to specific properties**
- **Our strong team**
- **Our fresh new approach**

JPS, with its many collective years of experience, understands the potential value of investment in Real Estate. Our role is to ensure that our client's investment remains healthy in all aspects. This will improve living conditions and greatly contribute to wealth creation.

PART A

PROMOTION OF

ACCESS TO

INFORMATION (PAIA)



DEFINITIONS

“The Act” means the Promotion of Access to Information Act, No. 2 of 2000, together with all relevant regulations published.

“Client” refers to any natural or juristic person that received or receives services from the Company.

“The Company” means JHB PROPERTY SERVICES (PTY) LTD, registration number 1989/002734/07.

“Complaint” means a matter reported to the Information Regulator.

“Complainant” means any person who lodges a complaint with the Information Regulator.

“Constitution” means the Constitution of the Republic of South Africa 1996.

“Data subject” means the person to whom the personal information relates.

“Consent” means any voluntary, specific and informed expression of will in terms of which permission is given for the processing of personal information.

“De-identify” means, in relation to personal information of a data subject, to delete any information that:

- Identifies the data subject.
- Can be used or manipulated by a foreseeable method to identify the data subject; or
- Can be linked by foreseeable method to other information that identifies the data subject.

“Direct marketing” means to approach a data subject either in person or by mail or electronic communication, for the direct or indirect purpose of:

- Promoting or offering to supply, in the ordinary course of business, any goods or services to the data subject, or
- Requesting the data subject to make a donation of any kind for any reason.

“Electronic communication” means any text, voice, sound or image message sent over an electronic communications network which is stored in the network or in the recipient’s terminal equipment until the recipient collects it.

“Information Officer” means the Information Officer appointed by the Company from time to time, whose details are included under below, to which requests for information in terms of the Act should be addressed.

“Manual” shall mean this manual together with all annexures thereto, as available at the offices of the Company and on the Company’s website.

“Operator” means a person who processes personal information for the responsible party in terms of a contract or mandate, without coming under the direct authority of that party.

“Person” means a natural or juristic person.

“Personal information” means information relating to an identifiable, living, natural person, and where it is applicable, an identifiable existing juristic person, including but not limited to:

- 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.
- Information relating to the education or the medical, financial, criminal or employment history of the person.

- Any identifying number, symbol, email address, physical address, telephone number, location information, online identifier or another particular assignment to the person.
- The personal opinions, views or preferences of the person
- 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.

“Private body” means:

- A natural person who carries or has carried out any trade, business or profession, but only in such capacity
- A partnership which carries or has carried out any trade, business or profession; or
- Any former or existing juristic person but excludes a public body.

“Processing” means any operation or activity or any set of operations, whether or not by automatic means, concerning personal information, including:

- The collection, receipt, recording, organisation, collation, storage, updating or modification, retrieval or use.
- Compiling using transmission, distribution or making available in any other form, or

“POPIA” means the Protection of Personal Information Act 4 of 2013.

“POPIA Regulations” means the regulations promulgated in terms of section 112(2) of POPIA.

“Responsible Party” has the meaning ascribed thereto in section 1 of POPIA.

“SAHRC” means the South African Human Rights Commission.

BACKGROUND

The Promotion of Access to Information Act, No. 2 of 2000 was enacted on 3 February 2000, giving effect to the constitutional right in terms of section 32 of the Bill of Rights contained in the Constitution of the Republic of South Africa 108 of 1996 (the “Constitution”) of access to any information held by the state and any information that is held by another person and that is required for the exercise or protection of any rights.

In terms of section 51 of the Act, all Private Bodies are required to compile an Information Manual (PAIA Manual).

Where a request is made in terms of the Act, the body to whom the request is made is obliged to deal with such a request in the manner prescribed in the Act, except where the Act expressly provides that the information may not or must not be released.

PURPOSE

The purpose of our PAIA is to promote the right of access to information, to foster a culture of transparency and for accountability within JHB Property Services by giving the right to information that is required for the exercise or protection of any right and to actively promote a society in which the people of South Africa have access to information to enable them to exercise and protect their rights.

In order to promote effective governance of private bodies, it is necessary to ensure that everyone is empowered and educated to understand their rights in relation to public and private bodies.

Section 9 of the Act recognises that the right to access information cannot be unlimited and should be subject to justifiable limitations, including, but not limited to:

- Limitations aimed at the reasonable protection of privacy.
- Commercial confidentiality.
- Effective, efficient and good governance.

This PAIA Manual complies with the requirements mentioned in section 10 of the Act and recognises that upon commencement of the Protection of Personal Information Act 4 of 2013, that the appointed Information Regulator will be responsible to regulate compliance with the Act and its regulations.

The purpose of our manual is to help the public have an understanding of how to:

- Check the categories of records held by JPS.
- Check which records are available without having to submit a formal request.

- Have sufficient understanding of how to make a request for records held by JPS.
- Access the contact details of the Information Officer who will assist the public.
- Know if JPS has appropriate security measures to ensure confidentiality, integrity and availability of personal information.

The purpose of the manual is to make available to potential requesters information regarding the records held, to define the manner and form in which a request for information must be submitted and to set out the criteria and grounds, derived from the Act, to be applied with in granting or refusing a request.

The objective of the manual is to inform and assist potential requesters in regard to the procedure to be followed and the criteria to be applied when a request is made for access to information held by Johannesburg Property Services (Pty) Ltd in terms of the Act.

The manual may be amended from time to time as and when necessary. As and when amendments are made, the latest version of the manual will be made public.

HOW TO USE PAIA AND HOW TO OBTAIN ACCESS TO THE PAIA GUIDE

PAIA grants a requester access to records of a private/public 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.

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 previously mentioned Guide contains the description of:

- ❖ The objects of PAIA and POPIA.
- ❖ The postal and street address, phone and fax number and, if available, electronic mail address of The Information Officer of every public body.
- ❖ Every Deputy Information Officer of every public and private body designated in terms of section 17(1) of PAIA and section 56 of POPIA.
- ❖ The manner and form of a request for access to a record of a public body contemplated in section 11 of PAIA.
- ❖ Access to a record of a private body contemplated in section 501 of PAIA.
- ❖ The assistance available from the IO of a public body in terms of PAIA and POIA.
- ❖ The assistance available from the Regulator in terms of PAIA and POPIA.
- ❖ 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:
 - An internal appeal.
 - A complaint to the Regulator.
 - 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 14 and 512 of PAIA requiring a public body and private body, respectively, to compile a manual, and how to obtain access to a manual.
- ❖ The provisions of sections 15 and 523 of PAIA providing for the voluntary disclosure of categories of records by a public and private body, respectively.
- ❖ The notice issued in terms of sections 22 and 544 of PAIA regarding fees to be paid in relation to request for access.
- ❖ The regulations made in terms of section 925 of PAIA.

NOTES

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.

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 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 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.
- From the website of the Regulator (<https://www.justice.gov.za/infoereg/>).

APPLICABLE LEGISLATION (SECTION 51 (1) (c)) OF PAIA

Records are kept in accordance with legislation applicable to JPS which includes but is not limited to the following: -

No. 75 of 1997 Basic Conditions of Employment Act.

No.71 of 1991 Businesses Act.

No. 71 of 2008 Companies Act and Amended Regulations, 2023

No.130 of 1993 Compensation for Occupational Injuries and Diseases Act.

No. 89 of 1998 Competition Act.

No. 68 of 2008 Consumer Protection Act.

No. 108 of 1996 Constitution of the Republic of South Africa.

No. 47 of 1937 Deeds Registries Act.

No. 57 of 2002 Disaster Management Act.

No. 25 of 2002 Electronic Communications and Transactions Act.

No. 55 of 1998 Employment Equity Act.

No. 95 of 1967 Income Tax Act.

No. 66 of 1995 Labour Relations Act.

No. 85 of 1993 Occupational Health and Safety Act.

No. 2 of 2000 Promotion of Access of Information Act.

No.4 of 2000 Promotion of Equality and Prevention of Unfair Discrimination Act.

No. 4 of 2013 Protection of Personal Information Act and Regulations Relating to the Act.

No. 95 of 1986 Sectional Titles Act.

No. 8 of 2011 Sectional Titles Schemes Management Act 35.

No. 97 of 1997 Skills Development Act.

No. 33 of 2004 The Protection of Constitutional Democracy against Terrorist and Related Activities.

No. 30 of 1996 Unemployment Insurance Act.

No. 63 of 2001 Unemployment Insurance Act.

No. 89 of 1991 Value Added Tax Act.

No. 28 of 2011 Tax Administration Act.

CATEGORIES AND TYPES OF INFORMATION COLLECTED BY JPS

These are the categories of information kept by JPS. These records' availability is subject to the grounds of granting or refusal as set out in PAIA.

RECORD	SUBJECT	AVAILABILITY
Manuals, Privacy Policy and other Policies	<ul style="list-style-type: none"> • PAIA/POPI Manual • Privacy Policy • RMCP 	Available upon request to nicole@joprop.co.za
Financial Records	<ul style="list-style-type: none"> • Annual Financial Statements • Management Accounts • Tax Returns • Tax Clearance Certificates • Accounting Records • Banking Records • Audit Reports • Lease Records • Insurance Policies • Budgets • Utility Statements 	Request in terms of PAIA
Company Records		Request in terms of PAIA
Human Resources	<ul style="list-style-type: none"> • List of Employees • Employment Contracts • Employment History • Employee Information • Disciplinary Records • Compensation Records 	Request in terms of PAIA

	<ul style="list-style-type: none"> • Employee Tax Information • Payroll Records • Internal Policies and Procedures • Performance Records • Customer Database 	
Clients, Third Party and Suppliers Information	<ul style="list-style-type: none"> • Agreements with Clients and Service Providers • Correspondence with Clients, Service Providers and Third Parties • Records relating to clients and Service Providers 	Request in terms of PAIA
Licenses and Intellectual Property	<ul style="list-style-type: none"> • Records relating to domain names • Software licenses 	Request in terms of PAIA
Compliance	<ul style="list-style-type: none"> • Fidelity Fund Certificates • FIC Registration • Registration with Information Regulator 	Available upon request to nicole@joprop.co.za

RECORDS AVAILABLE WITHOUT A REQUEST

The following records are available on payment of the prescribed fees for copies without completing the prescribed form in terms of the Act.

- a. Record of a public nature
- b. Records disclosed on our website
- c. Non-confidential reports
- d. Statutory records such as those maintained at the CIPC
- e. Other Non-confidential records such as newsletters, brochures, and similar.

Requests for such records must be directed to the Information Officer.

An appointment to view such records will have to be made with the Information Officer.

CRITERIA FOR GRANTING ACCESS TO INFORMATION

Any information, records, copies, documents or other data forming part of or pertaining to the records referred to above will only be made available to a requester in response to a request prepared and lodged in the prescribed format and in accordance with the prescribed procedure – see below.

Information, records, copies, documents or other data forming part of or pertaining to the aforesaid records will be made available to a requester in accordance with the provisions of the Act, and subject to the rules and principles entrenched in the Act in regard to the protection of the commercial and confidential information of Johannesburg Property Services and third parties and taking into account the other grounds for refusal of access as set out in the Act.

Johannesburg Property Services may, in terms of sections 62-70 of the Act, legitimately refuse to grant access to the aforesaid records in respect of information falling within certain categories as contemplated in the Act, inter alia in the following circumstances:

- To protect personal information that the firm holds about a third person (who is a natural person), including a deceased person, from unreasonable disclosure;
- To protect commercial information that the firm holds about a third party or the firm itself (for example trade secrets: financial, commercial, or technical information that may harm the commercial or financial interests of the organisation or the third party);
- 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;
- If disclosure of the record would endanger the life or physical safety of an individual;
- If disclosure of the record would prejudice or impair the security of property or means of transport;
- If disclosure of the record would prejudice or impair the protection of a person in accordance with a witness protection scheme;
- If disclosure of the record would prejudice or impair the protection of the safety of the public;
- If the record is privileged from production in legal proceedings, unless the legal privilege has been waived;
- If disclosure of the record (containing trade secrets, financial, commercial or technical information) would harm the commercial or financial interests of the firm;
- If disclosure of the record would put the firm at a disadvantage in contractual or other negotiations or prejudice it in commercial competition;
- If the record is a computer program; and
- If the record contains information about research being carried out or about to be carried out on behalf of a third party or the firm.

REQUESTS FOR INFORMATION

1. A requester requiring access to personal information held by JPS must complete the prescribed form - ACCESS TO RECORDS - which can be obtained by emailing: nicole@joprop.co.za.
2. The completed form can then be submitted to the Information Officer at the postal or physical address or electronic mail address listed above with proof of payment of the request fee and a deposit, if applicable. A deposit will be required depending on certain factors such as the volume and/or format of the information requested and the time required for search and preparation of the record(s). The requester will be notified of the amount of the deposit (if applicable).
3. The prescribed form must be completed with enough detail to at least enable the Information Officer to identify:
 - The record or records requested.
 - The preferred language the record is requested in.
 - The identity number of the requester.
 - The form of access required if the request is granted.
 - The postal address or fax number of the requester.

The requester must also state that he/she requires the information in order to exercise or protect a right and clearly state the nature of the right to be exercised or protected.

In addition, the requester must clearly specify why the record is necessary to exercise or protect such a right.

4. JPS will process the request within 30 days, unless the requester has stated special reasons which would satisfy the Information Officer that circumstances dictating that the above time periods are not complied with.
5. The requester will be informed in writing whether access has been granted or denied. If, in addition, the requester requires the reasons for the decision in any other manner, he/she must state the manner and the particulars so required.

If a request is made on behalf of another person, then 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 verbally. The requester must then pay the prescribed fee, if applicable, before any further processing can take place. JPS will, within 30 days of receipt of the request, decide whether to grant or decline the request and give notice with reasons (if required) to that effect.

REMEDIES AVAILABLE WHEN A REQUEST FOR INFORMATION IN TERMS OF PAIA IS DECLINED

INTERNAL REMEDIES

JPS does not have internal appeal procedures. Therefore, the decision made by the Information Officer is final. Requesters who are dissatisfied with a decision of the Information Officer will have to exercise external remedies at their disposal.

EXTERNAL REMEDIES

A requester or a third party, who is dissatisfied with an Information Officer's refusal to disclose information or the disclosed information, may lodge a complaint with the Information Regulator or may apply to the Magistrate's Court or another court of similar status for relief within 180 days of notification of the decision.

This is in accordance with sections 56(3) (c) and 78 of PAIA.

FEES PAYABLE

Fees payable in terms of the Act:

ACCESS FEES FOR REPRODUCTION

<i>For every photocopy of an A4-size page or part thereof</i>		<i>R 1.10</i>
<i>For every photocopy of an A4-size page or part thereof held on a computer or in electronic form</i>		<i>R 0.75</i>
<i>Copy in a computer-readable form on memory stick</i>		<i>R 70.00</i>
<i>Copy for a visual image</i>		<i>R 60.00</i>
<i>Copy of an audio record</i>		<i>R 30.00</i>

ACCESS FEE FOR TIME SPENT – R 30.00 / hour (the time reasonably required to search for the record and preparation).

REQUEST FEE – R 50.00 (for a request for access to a record by a person other than a personal requestor).

DEPOSIT

1. One third of the access fee is payable as a deposit by the requestor.
2. Six hours as the hours to be exceeded before a deposit is payable.

POSTAL FEES – R 9.75 (when a copy of a record must be posted to the requestor).

VAT – private bodies registered under the Value Added Tax Act, 89 of 1991 may add VAT to all the prescribed fees in terms of these regulations.

The fees for reproduction of a record as referred to in section 52(3) of PAIA, are available on the website of the Information Regulator <https://www.justice.gov.za/infoereg/>.

The following applies to requests (other than personal requests):

- A requestor is required to pay the prescribed fees before a request will be processed.
- 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).
- A requestor may lodge an application with a court against the tender/payment of the request fee and/or deposit.
- Records may be withheld until the fees have been paid.

THIRD PARTY REQUESTS

If access is requested to a record that contains information about a third party, JPS is obligated 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.

RECORDS THAT CANNOT BE FOUND OR DO NOT EXIST

If JPS 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 to locate the record.

FORMS ATTACHED

- ❖ **FORM 1 – REQUEST FOR A COPY OF THIS GUIDE**
- ❖ **FORM 2 – REQUEST FOR ACCESS TO A RECORD FROM JPS**
- ❖ **FORM 3 – OUTCOME OF A REQUEST AND FEES PAYABLE**
- ❖ **FORM 4 – INTERNAL APPEAL**
- ❖ **FORM 5 – COMPLAINT FORM**

PART B

PROTECTION OF

PERSONAL

INFORMATION(POPIA)



PROTECTION OF PERSONAL INFORMATION ACT (POPIA)

The Protection of Personal Information Act 4 of 2013 aims:

- to promote the protection of personal information processed by public and private bodies.
- to introduce certain conditions to establish minimum requirements for the processing of personal information.
- to provide for the establishment of an Information Regulator to exercise certain powers and to perform certain duties and functions in terms of this Act and the Promotion of Access to Information Act, 2000.
- to provide for the issuing of codes of conduct.
- to provide for the rights of persons regarding unsolicited electronic communications and automated decision making.
- to regulate the flow of personal information across the borders of the Republic; and
- to provide for matters connected therewith.

INTRODUCTION

POPIA was signed into law on 26 November 2013. The increasing cases of theft and misuse of people's personal information has led to the need to promulgate regulations to protect personal information and one's right to privacy. The POPI Act sets out the minimum standards regarding accessing and processing of personal information. The Act defines processing as collecting, receiving, recording, organizing, retrieving and the use, distribution or sharing of any such information.

Broadly, the purpose of POPIA is to give effect to section 14 of the Constitution, being the constitutional right to privacy by protecting Personal Information and regulating the free flow and Processing of Personal Information. POPIA sets minimum conditions which all Responsible Parties must comply with so as to ensure that Personal Information is respected and protected. POPIA recognises that the right to privacy may be limited in accordance with section 36 of the Constitution to the extent that such limitation is reasonable and justifiable in an open and democratic society based on human dignity, equality, and freedom.

The Protection of Personal Information Act is intended to balance the scale legally by protecting a person's constitutional rights to privacy and the needs of business to have access to and process a person's specific personal information to perform the task they are set out to do.

Johannesburg Property Services takes privacy, online safety and security of your personal information very seriously. This manual explains why, what, when and how your personal information is processed and protected by us as required by the Protection of Personal Information Act (POPIA).

WHAT IS PERSONAL INFORMATION?

Personal Information is any information relating to an identifiable person (living natural person/ existing juristic person as far as applicable), i.e.:

- **race, gender, sex, pregnancy, marital status, national, ethnic or social origin, colour, sexual orientation, age, physical or mental health, wellbeing, disability, religion, conscience, belief, culture and birth.**
- **education or medical, financial, criminal or employment history.**
- **any identifying number, symbol, e-mail address, physical address, telephone number, location information, online identifier or other particular assigned to the person.**
- **biometric information.**
- **personal opinions, views or preferences.**
- **the views or opinions of another individual about the person.**
- **correspondence sent by the person that is implicitly or explicitly of a private/confidential nature.**
- **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.**

This Manual, amongst other things, details:

- ✓ **the purpose for which Personal Information may be processed.**
- ✓ **a description of the categories of Data Subjects for whom the JPS Processes Personal Information as well as the categories of Personal Information relating to such Data Subjects.**
- ✓ **the recipients to whom Personal Information may be supplied.**
- ✓ **the procedure to be followed when requesting access to information / documents from the Company as contemplated in terms of the Act.**

This Manual has been compiled by the Information Officer as an integral part of the JPS's compliance framework in terms of Regulation 4(1)(a) of the POPIA Regulations and following the completion of a personal information impact assessment as envisaged by section 4(1)(b) of the POPIA Regulations. The manual may be amended from time to time and as soon as any amendments have been finalised, the latest version of the manual will be made public.

Any requestor is advised to contact the Information Officer should he / she require any assistance in respect of the utilization of this manual and / or the requesting of information / documents from the Company.

DEFINITIONS

“The Act” means the Promotion of Access to Information Act, No. 2 of 2000, together with all relevant regulations published.

“Biometrics” means a technique of personal identification that is based on physical, physiological or behavioural characterisation including blood typing, fingerprinting, DNA analysis, retinal scanning and voice recognition.

“Client” refers to any natural or juristic person that received or receives services from the Company.

“The Company” means JHB PROPERTY SERVICES (PTY) LTD, registration number 1989/002734/07.

“Constitution” means the Constitution of the Republic of South Africa 1996.

“Data subject” means the person to whom the personal information relates.

“Consent” means any voluntary, specific and informed expression of will in terms of which permission is given for the processing of personal information.

“De-identify” means, in relation to personal information of a data subject, to delete any information that:

- Identifies the data subject.
- Can be used or manipulated by a foreseeable method to identify the data subject; or
- Can be linked by foreseeable method to other information that identifies the data subject.

“Direct marketing” means to approach a data subject either in person or by mail or electronic communication, for the direct or indirect purpose of:

- Promoting or offering to supply, in the ordinary course of business, any goods or services to the data subject, or
- Requesting the data subject to make a donation of any kind for any reason.

“Electronic communication” means any text, voice, sound or image message sent over an electronic communications network which is stored in the network or in the recipient’s terminal equipment until the recipient collects it.

“Information Officer” means the Information Officer appointed by the Company from time to time, whose details are included under below, to which requests for information in terms of the Act should be addressed.

“Information Regulator” means the Regulator established in terms of section 39 of the Personal Information Act of 2013.

“Manual” shall mean this manual together with all annexures thereto, as available at the offices of the Company and on the Company’s website.

“Operator” means a person who processes personal information for the responsible party in terms of a contract or mandate, without coming under the direct authority of that party.

“Person” means a natural or juristic person.

“Personal information” means information relating to an identifiable, living, natural person, and where it is applicable, an identifiable existing juristic person, including but not limited to:

- 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.
- Information relating to the education or the medical, financial, criminal or employment history of the person.
- Any identifying number, symbol, email address, physical address, telephone number, location information, online identifier or another particular assigned to the person.
- The personal opinions, views or preferences of the person.
- The biometric information of the person.
- The personal opinions, views or preferences of the person.
- 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.

But excludes information about an individual who has been dead for more than twenty (20) years.

“Private body” means:

- A natural person who carries or has carried out any trade, business or profession, but only in such capacity
- A partnership which carries or has carried out any trade, business or profession; or
- Any former or existing juristic person but excludes a public body.

“Processing” means any operation or activity or any set of operations, whether or not by automatic means, concerning personal information, including:

- The collection, receipt, recording, organisation, collation, storage, updating or modification, retrieval or use.
- Compiling using transmission, distribution or making available in any other form, or

“POPIA” means the Protection of Personal Information Act 4 of 2013.

“POPIA Regulations” means the regulations promulgated in terms of section 112(2) of POPIA.

“Responsible Party” has the meaning ascribed thereto in section 1 of POPIA.

“SAHRC” means the South African Human Rights Commission.

INFORMATION OFFICER

JPS has appointed an Information Officer who has registered with the Information Regulator.

Information Officers are to comply with the following prescribed responsibilities:

- Encouraging and ensuring compliance with POPIA
- Dealing with information access requests according to POPIA and
- Working with the Information Regulator about investigations conducted in terms of POPIA.
- Develop a compliance framework, implement it, monitor and review regularly.
- Develop an Impact Assessment to ensure that adequate measures and standards exist in order to comply with lawful processing of personal information.
- Develop a measuring standard for lawful processing of personal information and the issuing of personal information.
- Develop a PAIA policy and make it available as prescribed in sections 14 and 51 of the Act.
- Develop regular training sessions (including Internal Awareness sessions regarding the provisions of the Act, codes of conduct and information obtained from the Regulator).

Name	NICOLE LASKER
Designation in Agency	DIRECTOR
Email	nicole@joprop.co.za
Cell	082 8508137
ID	7001280028086
Agency	JHB PROPERTY SERVICES
Tel	011 3378100
Address	1ST FLOOR MANCHESTER HOUSE, 68 VON WEILIGH STREET, JOHANNESBURG, 2001
Postal Address	PO BOX 9104 JOHANNESBURG 2000
Registration confirmation with Registrar	ATTACHED

Dual Information Officers: None

PERSONAL INFORMATION IMPACT ASSESSMENT

Section 4(1)(b) of the regulations relating the protection of personal information create a legal obligation for responsible parties to perform personal information impact assessments.

Further, section 57(1) of the Act specifies that when a high risk to the rights and freedoms of data subjects is likely, specifically in the cases expressly mentioned in Section 57(1), that is:

- for a purpose other than the one for which the identifier was specifically intended at collection and with the aim of linking the information together with information processed by other responsible parties.
- for the purpose of processing information on criminal behaviour or on unlawful or objectionable conduct on behalf of third parties.
- for the purpose of processing information for purposes of credit reporting.

- for the purpose of transferring special personal information (i.e., religious or philosophical beliefs, race or ethnic origin, trade union membership, political persuasion, health or sex life or biometric information of a data subject) or personal information of children to a third party in a foreign country that does not provide an adequate level of protection for the processing of personal information the responsible party must obtain prior authorisation from the Information Regulator, in terms of section 58.

Our Personal information impact assessment will cover:

- a systematic description of the envisaged processing operations and the purposes of the processing, including, where applicable, the legitimate interest pursued by the responsible parties.
- an assessment of the necessity and proportionality of the processing operations in relation to the purposes.
- an assessment of the risks to the rights of data subjects.
- the measures envisaged to address the risks, including:
 - safeguards,
 - security measures and
 - mechanisms to ensure the protection of personal information

Our Information Impact Assessment will demonstrate compliance with the privacy requirements, taking into account the rights and legitimate interests of data subjects and other persons concerned.

The purpose of completing personal information impact assessments is to ensure that adequate measures and standards exist to protect the rights of data subjects. The POPIA platform provides an automated process for completing personal information impact assessments efficiently and determining effective measures and standards to protect the rights of data subjects.

It is the responsibility of the information officer to perform a personal information impact assessment to ensure that adequate measures and standards exist in JPS in order to comply with the conditions for the lawful processing of personal information.

This assessment will identify which parts of the Act is applicable to the JPS, who are the data subjects, what information is collected and processed and what measures needs to be taken to ensure lawful processing and safeguarding of the information.

DATA SUBJECTS

When identifying and documenting data subjects, they are grouped per Data Process, as different information may be processed for the same individual in different processes. For example, employing individuals may be one process and completion of COVID registers may be a different process, even though the same information is collected and processed. This is due to the fact that the information is collected, used and stored in a different way and as such needs to be evaluated and treated separately.

The following data subjects have been identified during the impact assessment for whom the processes will be implemented:

- a) Employees
- b) Clients / Tenants
- c) Suppliers
- d) Directors

PROCESSING OF SPECIAL INFORMATION

We process special personal information for the following:

DATA SUBJECT	REASON FOR PROCESSING
Employees	For payroll
Tenants / Owners	To provide services
Suppliers	To be able to obtain services
Director	To stay updated on compliance

We will only process this information if one of the following is applicable:

- a) Consent is obtained from the Data subject.
- b) Processing is necessary for the establishment, exercise or defence of a right or obligation in law.
- c) Information has deliberately been made public by the data subject.
- d) Processing is authorised by Regulator.

PRIOR AUTHORIZATION

JPS will obtain prior authorisation before any processing if we plan to:

- a) Process any unique identifiers of data subjects for a purpose other than the one for which the identifier was specifically intended at collection.
- b) Process information for the purposes of credit reporting.
- c) Transfer special personal information, or the personal information of children, to a third party in a foreign country that does not provide an adequate level of protection for the processing of personal information.

JPS will obtain prior authorisation only once and not each time that personal information is received or processed, except where the processing departs from that which has been authorised. This authorisation will be obtained by notifying the Data Subject of the processing as above.

PRIVACY NOTICE

JPS will always protect the privacy of all persons whose personal information we collect, in terms of the POPI Act. **Privacy Policy available on our website (www.johannesburgpropertyservices.co.za).**

PERSONAL INFORMATION

Personal Information means information relating to an identifiable, living, natural person and, where it is applicable, an identifiable, existing juristic person.

WHAT PERSONAL INFORMATION DO WE COLLECT

At JPS we only collect information that is relevant to the purpose.

We collect personal information including:

- identity documents,
- proof of address,
- financial details (like bank statements and tax returns), and
- contact information (name, email, phone).

We collect all this data to primarily to comply with FICA requirements. This information is used to verify identity (KYC), assess the source of funds for a transaction, and facilitate the property transaction process. We are legally required to handle this data responsibly and securely, ensuring transparency and obtaining consent from clients. We will always ensure we have the data subject's consent and that we only collect data for specific, legitimate purposes. Personal information will not be shared with third parties unless legally required to do so.

Types of Personal Information Collected

- **Identity:** A certified copy of your South African ID or passport.
- **Address:** Proof of your residential address, such as recent utility bills or a rental agreement.
- **Financial Information:** Payslips, bank statements, and tax returns to verify the source of funds for a property transaction.
- **Contact Details:** Your name, email address, and cellular phone number.
- **Tax Number:** Your tax registration number with SARS.

JPS has strict protocols when it comes to your personal information:

- I. Consent of a tenant / owner will always be obtained before we share information.
- II. Tenant / Owner information that we collect will be for valid reasons only.
- III. There will always be transparency and accountability of how the collected data will be used.
- IV. Data that is no longer in use will be destroyed.
- V. Only authorized individuals will have access to tenant / owner information.
- VI. Tenant / Owner information will always be safeguarded from theft or damage by correct storage procedures.
- VII. Tenant / Owner information will be captured correctly and once collected, JPS is responsible for maintaining it.
- VIII. Any Tenant / Owner has the right to access personal information that we hold for you and the right to request that your personal information be changed or deleted from our records.

DOCUMENTS / INFORMATION HELD BY THE COMPANY IN TERMS OF SECTION 51(1)(e) OF THE ACT

- Documents relating to the operational, commercial and financial interest of the Company.
- Lease contracts.
- Client data base (personal information of clients, commercial and financial information, information on existing and past business transactions, lease agreements, proposals and intellectual property of such clients).
- Employment contracts.
- Personnel records for the Company's employees.
- Insurance policies

LAWFUL PROCESSING OF INFORMATION

POPIA sets out conditions that we must comply with when processing personal information. These conditions ensure our client's personal information is being lawfully processed.

The procedure of processing personal information refers to the collection, recording, organisation, storage, updating or modification and retrieval of data.

There are eight (8) conditions that shall apply and which are relevant for the lawful processing of personal information:

- i. **Accountability** - The Principal/Manager (responsible party) must ensure that the conditions and all the measures set out in the Act are followed through in the office.
- ii. **Processing limitation** - Personal information may only be processed in a fair and lawful manner and only with the consent of the person whose information it is (data subject) and for the intention for which it was collected.
 - The personal information must be obtained directly from the person (Data Subject)
 - The person should be aware that we gather his/her information and consent to the information to be used.

- If a third party is being used to collect personal data, the person (Data Subject) must consent to this information being shared and used by us first.
 - Only information that is required for the specific purpose, for which it is gathered may be stored.
- iii. **Purpose specification** - We limit the amount of personal information collected and processed to only what is fit for the purposes as needed. The specific purpose must be documented and adhered to.
- Data Subject has the right to know what information we have and for what purpose it was gathered.
 - We will have to be able to link all personal information collected to legitimate reasons for collecting.
 - Personal information may only be used for the specific purpose for which it was gathered and thereafter it must be destroyed.
 - We will be required to account for what information we hold, for what purpose it was gathered and a date that that information must be destroyed.
 - We will destroy Personal Information, in a manner that prevents its reconstruction, after we are no longer authorized to retain such records.
- iv. **Further processing limitation** - Personal information may not be processed for a secondary purpose unless that processing is compatible with the original purpose.
- v. **Information quality** - While in our possession, together with the data subject's assistance, we try to maintain the accuracy of personal information.
- We will obtain information directly from the data source to ensure accuracy, as far as possible.
 - When advising Data Subjects of the information we hold and for what purpose we hold it, they will be given details of how to check and update their information or withdraw consent.
- vi. **Transparency (honesty and integrity)** - The data subject whose information we are collecting will be made aware that we are collecting such personal information and for what purpose the information will be used and her/ his rights.
- We will gather personal information from Data Subjects after them signing a consent form.
 - The Data Subject will be informed of how the data will be used at the time of gathering the information.
 - The Data Subjects will be given a letter with the details of the principal (responsible person) in our agency and the Information Regulator contact details.
 - The Data Subject will be advised of his/her rights to complain to the Information Regulator if misuse is suspected.
 - The Data Subject will always be advised of his/her rights to access his/her information and to object to the processing of said information.
- vii. **Security safeguards** - We restrict, secure, and control all our information against unauthorised access, interference, modification, damage, loss, or destruction; whether physical or electronic.
- We will do a safety and security risk assessment from time to time to ensure we keep up with requirements and this will be discussed at a designated staff meeting for all personnel's input.
 - Our staff is informed / trained to be compliant with POPI Act, and this training must be ongoing and up to date.

- We do everything we can to prevent personal information from falling into unauthorized hands.
 - All our laptops, phones and computer network are protected by passwords which we change on a regular basis.
 - We have firewalls and a company that assists with IT security etc.
 - We are as small estate agency, so it is easy to determine which employees are permitted access personal information and what information they are permitted to access.
 - Personal information can only be accessed or modified by those employees with the password's authorising them to do so.
 - If there were a data breach, we will determine the source, neutralise it and prevent the reoccurrence of such a data breach.
 - When we make use of an external operator our principal (responsible party) will, in terms of a written contract between our agency and the operator, ensure that the operator establishes and maintains the required security measures.
 - The operator must advise immediately if there is the possibility that personal data has been accessed or acquired by any unauthorized person.
 - The Data Subject will be advised via e-mail or in writing immediately if it is suspected that their personal information has been access by unauthorized persons. Sufficient information will be provided to allow the Data Subject to put measures in place to safeguard themselves against potential consequences of the security compromise.
- viii. **Data subject participation** - Data subjects may request whether their personal information is held, as well as the correction and/or deletion of any personal information held about them.
- Data Subjects may request information from us on whether we are holding their personal information.
 - This request will not be declined, and we will not charge for it.
 - The Data Subject has the right to correct the personal information that we hold.
 - They also have the right to withdraw consent at any time.

PROCESSING

- A. Personal information collected by the Company will be collected directly from the data subject, unless:**
- i. The information is contained or derived from a public record or has deliberately been made public by the data subject.
 - ii. The data subject is a minor and he/she has consented to the collection of the information from another source.
 - iii. Collection of the information from another source would not prejudice a legitimate interest of the data subject.
 - iv. Collection of the information from another source is necessary to avoid prejudice to the maintenance of the law.
 - v. Compliance would prejudice a lawful purpose of the collection.
 - vi. Compliance is not reasonably practicable in the circumstances of that instance.
- B. Personal information will only be collected for a specific, explicitly, defined and lawful purpose, related to the function or activity of the Company.**

- C. JPS will ensure that the data subject is aware of what information is collected prior to the collection thereof.**
- D. JPS will ensure the data subject consents to the collection of personal information.**
- E. We will always inform the data subject what the purpose is for the collection of this information and inform the data subject regarding:**
 - i. Whether the information to be collected is a voluntary or mandatory function to be performed.**
 - ii. The consequences of the matter for the data subject should they fail to provide the information.**
 - iii. whether it is ascertained that a legal authority requires the collection of the information for their records.**
 - iv. Whether this information needs to be transferred to another source.**
- F. JPS will ensure that the personal information is complete, accurate, not misleading and is updated from time to time.**
- G. We will ensure that the information which is collected is not excessive. To collect solely the information, which is necessary for the company, which it requires to execute its functions or in the interests of a third party, where the information will be provided to them.**
- H. JPS undertakes to regard personal information as strictly private and confidential and not to disclose it to any other party, unless required by law to take this course of action, or the consideration of the correct performance of the company's duties and tasks.**
- I. The Company will take responsibility to keep on record all the appropriate documentation of all processing operations.**

ADDITIONAL PROCESSING PROCEDURES REGARDING PERSONAL INFORMATION

The Company undertakes to ensure that any additional processing of personal information will be in accordance with the purpose for which it was collected.

To assess whether any additional processing is in accordance with the purpose of collection, the following detail should be considered:

- i. The relationship between the purpose of the intended additional processing and the purpose or intention for which the information was collected.**
- ii. The nature of the information concerned.**
- iii. The consequences of this action for the data subject regarding the intention of processing additional information.**
- iv. The manner/method in which this information was collected.**
- v. Any contractual rights and obligations between the parties.**

PURPOSE OF PROCESSING OF PERSONAL INFORMATION

The purposes for which the Company processes or will process Personal Information is as follows:

- To provide accounts and/or services to the Client in accordance with terms agreed to by the Client.
- To undertake activities related to the provision of accounts and/or services to the Client.
- To verify the identity of the Client.
- For risk assessment, information security management, statistical, trend analysis and planning purposes.
- To monitor and record calls and electronic communications with the Client for quality, training, investigation, and fraud prevention purposes.
- For crime detection, prevention, investigation and prosecution.
- To enforce or defend the Company's rights.
- To manage the Company's relationship with the Client, which may include providing information to the Client about the Company's products and/or service.
- Any additional purposes expressly authorised by the Client; and
- Any additional purposes as may be notified to the Client or Data Subjects in any notice provided by the Company.

The Company shall Process Personal Information on the following Data subjects:

JURISTIC PERSON

- ✓ business name
- ✓ business address
- ✓ business registration number
- ✓ VAT registration number
- ✓ contact details of all members (full names, phone numbers and email addresses)
- ✓ proof of registration with SARS
- ✓ corporate structure
- ✓ list of authorized signatories

NATURAL PERSON

- ✓ full name/s and surname
- ✓ contact details (company and home) – phone and email
- ✓ proof of address
- ✓ tax identification number, if applicable
- ✓ bank account information (bank account number, bank account name, bank account type)
- ✓ photographs and other identification and verification data as contained in images of ID card, passport, and other ID documents, including images of customer signature.

EMPLOYEES

- ✓ full name/s and surname
- ✓ employee ID number
- ✓ business contact details (address/telephone number/email address)
- ✓ tax number, if applicable

SECURITY

The Company shall implement the following security measures in order to ensure that Personal Information is respected and protected:

Access Control of Persons

The Company shall implement suitable measures in order to prevent unauthorized persons from gaining access to the data processing equipment where the data is processed.

Data Media Control

The Company undertakes to implement suitable measures to prevent the unauthorized manipulation of media, including reading, copying, alteration or removal of the data media used by the Company and containing personal data of clients.

Data Memory Control

The Company undertakes to implement suitable measures to prevent unauthorized input into data memory and the unauthorized reading, alteration, or deletion of stored data of the Data Exporter's customers.

User Control

The Company shall implement suitable measures to prevent its data processing systems from being used by unauthorized persons by means of data transmission equipment.

Access Control to Data

The Company represents that the persons entitled to use the Company's data processing system are only able to access the data within the scope and to the extent covered by their respective access permissions (authorisation).

Transmission Control

The Company shall be obliged to enable the verification and tracing of the locations and/or destinations to which the Personal Information is transferred by utilisation of the Company's data communication equipment and devices.

Transport Control

The Company shall implement suitable measures to prevent Personal Information from being read, copied, altered, or deleted by unauthorized persons during the transmission thereof or during the transport of the data media.

Organisation Control

The Company shall maintain its internal organisation in a manner that meets the requirements of this Manual.

A preliminary assessment of the suitability of the information security measures implemented or to be implemented by the Company may be conducted in order to ensure that the Personal Information that is processed by the Company is safeguarded and Processed in accordance with the Conditions for Lawful Processing.

REQUESTS FOR ACCESS, CORRECTION AND/OR DELETION OF INFORMATION

JPS has created an effortless process for the receipt of data subject access requests. The subject data can correct, withdraw consent or object to the collection of his/her data.

The data subject, or competent person where the data subject is a minor, may withdraw his/her or its consent to procure and process his/her or its personal information in terms of section 24 of the Act, at any time, providing that the processing of the personal information was performed legally, prior to the request for the withdrawal.

A data subject, having provided adequate proof of identity, has the right to:

- i. request the Company to confirm, free of charge, whether it holds personal information regarding the data subject.
- ii. request from the Company a record or a description of the personal information relevant to the data subject held by the Company, including information regarding the identity of all third parties, or categories of third parties, who have, or have had, access to the information.

This must be processed within a reasonable period, at a fee prescribed as determined by the Information Officer, in a reasonable manner and format and in a form that is understandable.

A data subject may request the Company, to correct or delete (personal information (in terms of section 24(1) of the Act) in its possession or under its management which is inaccurate, irrelevant, excessive, out of date, incomplete, misleading or has been obtained illegally. This request must be submitted to the Company on **Form 2 (ATTACHED)**. The Company will notify, in writing, the data subject of the outcome of his/her/its request within thirty (30) days of receipt and of the action taken as a result of the request.

OBJECTION TO THE PROCESSING OF PERSONAL INFORMATION

Section 11(3) of POPIA and regulation 2 of the POPIA Regulations provides that a Data Subject may, at any time object to the Processing of his/her/its Personal Information, in the prescribed form, subject to exceptions contained in POPIA. A data subject who wishes to object to the processing of personal information in terms of section 11(3)(a) or 11(3)(b) of the Act, can submit the objection(using Form 1) to our Information Officer at any time during office hours with no charge.

DIRECT MARKETING

1. Classify the data subject. Determine if they have given their consent for the processing of their information or if they are already a customer of your business.
2. Obtain consent in the prescribed manner and form. Keep records of consent.
3. Comply with specific processing requirements. Ensure that the customer information has been obtained.
4. In the context of the sale of a product or a service.

MINORS

We are unlikely to process any personal information of children except where an adult puts a property in a minor's name. This would be done with the parent or legal guardian's consent.

STORAGE OF PERSONAL INFORMATION

At our agency, we ensure that all personal information is stored in the cloud. Access to this information is controlled by the Information Officer who will issue a password to any staff member who is in the line of business needs access to this information. All staff members sign a document agreeing to abide by the regulations within the POPI Act.

COOKIE POLICY

Cookie Policy - available on our website (www.johannesburgpropertservices.co.za).

ENFORCEMENT OF THE POPI ACT

A person contravenes the provisions of POPIA if he/she:

- Hinders, obstructs, or unlawfully influences the Information Regulator.
- Fails to comply with an information or enforcement notice.
- Gives false evidence before the Information Regulator on any matter after having been sworn in or having made an affirmation.
- Contravenes the conditions.
- Knowingly or recklessly, without the consent of the responsible party, obtains, discloses, or procures the disclosure, sells, or offers to sell details of a data subject to another person; and will be guilty of an offence.

PENALTIES

This could result in far-reaching sanctions, these include the imposition of fines up to R10 million, imprisonment for a period of 12 months to 10 years and/or damages claim by the data subject.

THE INFORMATION REGULATOR

The Information Regulator is empowered to monitor and enforce compliance by public and private bodies with provisions of the POPI Act. In terms of Chapter 10 of the POPI Act, any person may lodge a complaint with the Information Regulator regarding any interference with the protection of their personal information. Interference with the protection of the personal information of a data subject consists of:

- Any breach of the conditions of the lawful processing of personal information set out in the POPI Act.
- Non – compliance with any obligations created in terms of the POPI Act.
- A breach of the provisions of a code that has been issued in terms of section 60 of the POPI Act.

The contact details of the Information Regulator are:

The Information Regulator (South Africa)
PO Box 31533
Braamfontein
JD House 27 Stiemens Street
Braamfontein Johannesburg
2017
Complaints email: complaints.IR@justice.gov.za
General Enquiries: infoereg@justice.gov.za
<https://infoeregulator.org.za/complaints/>

LEGISLATION

The Company shall keep information / documents in accordance with the following legislation (please note that this is not an exhaustive list):

- **Constitution of the Republic of South Africa No. 108 of 1996**
- **Insolvency Act, No. 24 of 1936 (Section 134 and 155)**
- **Pension Funds Act, No. 24 of 1956**
- **Income Tax Act, No. 58 of 1962 (Section 75)**
- **Companies Act, No. 71 of 2008**
- **Copyright Act, No. 98 of 1978**
- **Property Practitioners Act No. 22 of 2019**
- **Consumer Protection Act No. 68 of 2000**
- **Disaster Management Act No. 57 of 2002**
- **Regional Services Councils Act, No. 109 of 1985**
- **Value Added Tax Act, No. 89 of 1991 (Section 65)**
- **Occupational Health and Safety Act, No. 85 of 1993**
- **Compensation for Occupational injuries and Diseases Act, No. 130 of 1993 (Section 97)**
- **Labour Relations Act, No. 66 of 1995**
- **Basic Conditions of Employment Act, No. 75 of 1997 (Section 31)**
- **Employment Equity Act, No. 55 of 1998 (Section 26)**
- **Skills Development Act, No. 97 of 1998**
- **Medical Schemes Act, No. 131 of 1998**
- **Skills Development Levies Act, No. 9 of 1999**
- **Unemployment Insurance Act, No. 63 of 2001**

The above records, insofar as it being of a public nature are available automatically without a person having to request access thereto in term of the Act.

AVAILABILITY OF THE MANUAL (Section 51(3) of the Act)

This manual is available:

- ❖ on our website.
 - ❖ for inspection at our office during normal business hours.
 - ❖ to any person upon request and payment of a fee that is determined by the Regulator.
 - ❖ to the Information Regulator upon request.
-

FORMS ATTACHED

- ❖ **FORM 1 – OBJECTION TO PROCESSING OF PERSONAL INFORMATION**
- ❖ **FORM 2 – REQUEST TO CORRECT OR DELETE INFORMATION**
- ❖ **FORM 3 – REQUEST FOR CODE OF CONDUCT**
- ❖ **FORM 4 – CONSENT FORM FOR DIRECT MARKETING**
- ❖ **FORM 5 – COMPLAINT FORM**