

SKG GROUP OF COMPANIES:

PROPERTY DEVELOPMENT

PROPERTY MANAGEMENT SERVICES

PROPERTY INVESTMENTS

CORPORATE AND SHARED SERVICES

INFORMATION TECHNOLOGY

TREASURY

(“SKG”)

MANUAL

in terms of Section 51

The Promotion of Access to Information Act No 2 of 2000 (as amended)

(“PAIA”)

and

The Protection of Personal Information Act No 4 of 2013

(“POPI”)

DATE OF COMPILATION: JUNE 2021

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1. DEFINITIONS

(including applicable Acronyms and Abbreviations)

- 1.1 **“CEO”**: Chief Executive Officer;
- 1.2 **Conditions of Lawful Processing** means the conditions for the lawful processing of Personal Information as fully set out in chapter 3 of POPI;
- 1.3 **Constitution** means the Constitution of the Republic of South Africa, 1996;
- 1.4 **Data Subject** has the meaning ascribed thereto in section 1 of POPI;
- 1.5 **“DIO”**: Deputy Information Officer;
- 1.6 **Head of the Company** means the “head” as defined in section 1 of PAIA and referred to in clause 5 of this manual;
- 1.7 **Information Officer (“IO”)** means the duly authorised and appointed Information Officer of SKG as referred to in clause 5 of this manual;
- 1.8 **Manual** means this manual prepared in accordance with section 51 of PAIA;
- 1.9 **“Minister”**: Minister of Justice and Correctional Services;
- 1.10 **“PAIA”** means the Promotion of Access to Information Act 2 of 2000 (as Amended);
- 1.11 **Personal Information** has the meaning ascribed thereto in section 1 of POPI;
- 1.12 **“POPI”** means the Protection of Personal Information Act 4 of 2013;
- 1.13 **POPI Regulations** mean the regulations promulgated in terms of section 112 (2) of POPI;
- 1.14 **Private Body** has the meaning ascribed thereto in sections 1 of both PAIA AND POPI;
- 1.15 **Privacy Policy** means the Privacy Policy of SKG, obtainable from its website at www.skg.co.za or from its offices or via electronic means, upon request to the Information Officer.
- 1.16 **Processing** has the meaning ascribed thereto in section 1 of POPI;
- 1.17 **“Regulator”**: Information Regulator
- 1.18 **Responsible Party** has the meaning ascribed thereto in section 1 of POPI;
- 1.19 **Record** has the meaning ascribed thereto in section 1 of PAIA and includes Personal Information;
- 1.20 **Requester** has the meaning ascribed thereto in section 1 of PAIA;
- 1.21 **Request for Access** has the meaning ascribed thereto in section 1 of PAIA;
- 1.22 **“Republic”**: Republic of South Africa
- 1.23 **“SKG”** means for purposes of this manual, ALL companies within the SKG Group.
- 1.24 **Website** means www.skg.co.za.

2. INTRODUCTION

This Manual is published in terms of Section 51 of PAIA which in its amended form, subsequent to POPI coming into force and effect requires certain information in relation to POPI to be included, and to give effect to the provisions of Section 32 and 14 of the Constitution of the Republic of South Africa (“the Constitution”) respectively. Section 32 of the Constitution provides for the right of access to information held by a person that is required for the exercise and / or protection of any right and section 14 of the Constitution gives effect to the constitutional right to privacy.

For the purposes of POPI, this manual, as read with SKG’s detailed Privacy Policy, linked in this policy and available on SKG’s website or at its offices or upon request to Information Officer, details the purpose for which Personal Information may be processed; a description of the categories of Data Subjects for whom SKG Processes Personal Information as well as the categories of Personal Information relating to such Data Subjects; and the recipients or categories of recipients to whom Personal Information may be supplied.

Reference in this Manual to any information in addition to that specifically required in terms of Section 51 of the Act does not create any right or entitlement (contractual or otherwise) to receive such information, other than in terms of PAIA.

This manual is available for inspection, free of charge, at the physical address of SKG and its Website.

3. PURPOSE OF PAIA MANUAL

Further to the purposes mentioned in section 2 above, this PAIA Manual is useful for the public to-

- 3.1 check the categories of records held by a body which are available without a person having to submit a formal PAIA request;
- 3.2 have a sufficient understanding of how to make a request for access to a record of the body, by providing a description of the subjects on which the body holds records and the categories of records held on each subject;

- 3.3 know the description of the records of the body which are available in accordance with any other legislation;
- 3.4 access all the relevant contact details of the Information Officer and Deputy Information Officer who will assist the public with the records they intend to access;
- 3.5 know the description of the guide on how to use PAIA, as updated by the Regulator and how to obtain access to it;
- 3.6 know if the body has planned to transfer or process personal information outside the Republic of South Africa and the recipients or categories of recipients to whom the personal information may be supplied; and
- 3.7 know whether the body has appropriate security measures to ensure the confidentiality, integrity and availability of the personal information which is to be processed.

4. OVERVIEW OF SKG

- 4.1 SKG is in the business of providing property management, property development, property leasing, and property investment services; in the commercial, industrial, retail, residential and mixed use real estate sectors and all related services whether through a written, or verbal agreement. The SKG service includes access to the Website and/or any of SKG's social media platforms.
- 4.2 The SKG Group ("SKG") comprises SKG Properties (Pty) Ltd, with registration number 2013/167614/07; and all companies in which SKG Properties is directly or indirectly a shareholder. The list of companies within our Group can be requested at our offices or via our Information Officer.
- 4.3 Further information on SKG can be accessed from SKG's Website – www.skg.co.za

5. SKG CONTACT DETAILS

- 5.1 **Holding Company for the GROUP:** SKG Properties (Pty) Ltd
Head of Body: Mr. Jean Prieur Du Plessis (CEO)
Email address: jean.duplessis@skg.co.za

Telephone number: +27 (0)43 706 6800

Physical Address (**Head Office**): Beacon Bay Crossing
C/O N2 and Bonza Bay
Road Beacon Bay
East London
5257
South Africa

Postal Address: P O Box 15402
Beacon Bay
East London
5205
South Africa

5.2 **INFORMATION OFFICER:** **Mr. Errol Prawlall**

Die Anker Building
1279 Mike Crawford Road
Centurion
0046
South Africa

Deputy Information Officer: **Mrs. Danielle J. Roberts**
Head Office

Deputy Information Officer: **Mr. Jonathan Clarke**
Head Office

Deputy Information Officer: **Mr. David E. Peinke**
20 Bert Kipling Road
Wilsonia
East London
5241
South Africa

All IO's and DIO's can be reached as follows:

Email address: popi@skg.co.za

Telephone number: +27 (0)43 706 6800 (East London)
+27 (0)86 175 4542 (Centurion)

Postal Address: P O Box 15402
Beacon Bay
East London
5205

Website: www.skg.co.za

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

- 6.1 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.
- 6.2 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.
- 6.3 The Guide is available in each of the official languages and in braille.
- 6.4 The aforesaid Guide contains the description of:
- 6.4.1 The objects of PAIA and POPIA;
 - 6.4.2 The postal and street address, phone and fax number and, if available, electronic mail address of-
 - 6.4.2.1 The Information Officer of every public body, and
 - 6.4.2.2 Every Deputy Information Officer of every public and private body designated in terms of section 17(1) of PAIA and section 56 of POPIA;
 - 6.4.3 The manner and form of a request for-
 - 6.4.3.1 Access to a record of a public body contemplated in section 11 of PAIA, and
 - 6.4.3.2 Access to a record of a private body contemplated in section 50² of PAIA;

- 6.4.4 The assistance available from the IO of a public body in terms of PAIA and POIA;
- 6.4.5 The assistance available from the Regulator in terms of PAIA and POPIA;
- 6.4.6 All remedies in law available regarding an act or failure to act in respect of a right or duty conferred or imposed by PAIA and POPIA, including the manner of lodging-
 - 6.4.6.1 An internal appeal;
 - 6.4.6.2 A complaint to the Regulator; and
 - 6.4.6.3 An application with a court against a decision by the information officer of a public body, a decision on internal appeal or a decision by the Regulator or a decision of the head of a private body;
- 6.4.7 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;
- 6.4.8 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;
- 6.4.9 The notice issued in terms of sections 22 and 54⁴ of PAIA regarding fees to be paid in relation to request for access; and
- 6.4.10 The regulations made in terms of section 92⁵ of PAIA.

¹ 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.

² 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.

³ 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

⁴ 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.

⁵ 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.”

- 6.5 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.

- 6.6 The Guide can also be obtained-
- 6.6.1 Upon request to the Information Officer;
 - 6.6.2 From the website of the Regulator (<https://www.justice.gov.za/inforeg/>).
- 6.7 A copy of the Guide is also available, at the SKG offices, in the following two official languages, for public inspection during normal office hours-
- 6.7.1 English, and
 - 6.7.2 Afrikaans
 - 6.7.3 As well as, available in a third language, Xhosa, at the SKG offices in the Eastern Cape.

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

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

ITEM	REFERENCE	ACT
1.	No. 75 of 1997	Basic Conditions of Employment Act
2.	No.71 of 1991	Businesses Act
3.	No. 53 of 2003	Broad Based Black Economic Empowerment Act
4.	No. 71 of 2008	Companies Act
5.	No.130 of 1993	Compensation for Occupational Injuries and Diseases Act
6.	No. 89 of 1998	Competition Act
7.	No. 68 of 2008	Consumer Protection Act
8.	No. 108 of 1996	Constitution of the Republic of South Africa
9.	No. 98 of 1978	Copyright Act
10.	No. 47 of 1937	Deeds Registries Act
11.	No. 57 of 2002	Disaster Management Act
12.	No. 2 of 2000	Electronic Communications and Transactions Act
13.	No. 55 of 1998	Employment Equity Act
14.	No. 19 of 2012	Financial Markets Act
15.	No. 37 of 2002	Financial Advisory and Intermediary Services Act
16.	No.23 of 1999	Harmful Business Practices Act
17.	No. 95 of 1967	Income Tax Act
18.	No.13 of 2000	Independent Communications Authority of South Africa

		Act
19.	No. 66 of 1995	Labour Relations Act
20.	No. 56 of 2003	Municipal Finance Management Act
21.	No. 107 of 1998	National Environmental Management Act
22.	No. 59 of 2008	National Environmental Management: Waste Act
23.	No. 26 of 2014	National Environmental Management Waste Amendment Act
24.	No. 85 of 1993	Occupational Health and Safety Act
25.	No. 57 of 1987	Patents Act
26.	No.24 of 1956	Pension Funds Act
27.	No. 5 of 2000	Preferential Procurement Policy Framework Act
28.	No. 2 of 2000	Promotion of Access of Information Act
29.	No.4 of 2000	Promotion of Equality and Prevention of Unfair Discrimination Act
30.	No.26 of 2000	Protected Disclosures Act
31.	No. 4 of 2013	Protection of Personal Information Act
32.	No. 70 of 2002	Regulation of Interception of Communications and Provisions of Communication Related Information Act
33.	No. 95 of 1986	Sectional Titles Act
34.	No. 8 of 2011	Sectional Titles Schemes Management Act
35.	No. 97 of 1997	Skills Development Act
36.	No. 9 of 1999	Skills Development Levy Act
37.	No. 53 of 1998	Short Term Insurance Act
38.	No.16 of 2012	Spatial Planning and Land Use Management Act
39.	No. 194 of 1993	Trade Marks Act
40.	No. 12 of 2004	The Prevention and Combatting of Corrupt Activities
41.	No. 33 of 2004	The Protection of Constitutional Democracy against Terrorist and Related Activities
42.	No. 30 of 1996	Unemployment Insurance Act
43.	No. 63 of 2001	Unemployment Insurance Act
44.	No. 89 of 1991	Value Added Tax Act
45.	No. 28 of 2011	Tax Administration Act

8. SCHEDULE OF RECORDS (SECTION 51 (1) (d) of PAIA)

These are the categories of information kept by SKG which records' availability is subject to the grounds of refusal set out in PAIA:

RECORD	SUBJECT	AVAILABILITY
Manuals, Privacy Policy and ad hoc policies	<ul style="list-style-type: none"> • PAIA/POPI Manual • Privacy Policy • Media Releases 	Freely available on www.skg.co.za
Financial Records	<ul style="list-style-type: none"> • Annual Financial Statements • Management Accounts • Tax Returns • Tax Clearance Certificate • Accounting Records • Banking Records • Audit Reports • Invoices • Insurance records • Lease records • Asset Register • Insurance Policies • Budgets • Utility Statements 	Request in terms of PAIA
Company Records	<ul style="list-style-type: none"> • Memorandum of Incorporation • Share Register and other statutory registers 	Request in terms of PAIA
Human Resources department	<ul style="list-style-type: none"> • List of Employees • Employment contracts • Employment history • Employee information • Disciplinary Records • Compensation records • Employment Equity Plan and Report • Employee tax information • Payroll records • Internal Policies and Procedures 	Request in terms of PAIA
Marketing	<ul style="list-style-type: none"> • Product Brochures • Owner Manuals • Field Records • Performance Records • Product Sales Records • Marketing Strategies • Customer Database • Dealer Franchise Documents 	Request in terms of PAIA

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"> • Licenses relating to intellectual property rights • Records relating to domain names • Trade marks, copyright and designs; • Software licenses 	Request in terms of PAIA
Compliance	<ul style="list-style-type: none"> • Broad Based Black Economic Empowerment compliance 	Freely available on www.skg.co.za

9. FORM OF REQUEST (SECTION 51 (1) (e))

- 9.1 A requester requiring access to personal information held by SKG must complete the prescribed form - “ACCESS to record(s)” - which can be found on the SKG Information Officer Portal: <https://www.skg.co.za/information-officer-portal/>; and submit the form to the Information Officer at the postal or physical address, or electronic mail address recorded in paragraph 5 and pay a request fee and a deposit, if applicable.
- 9.2 The prescribed form must be completed with enough detail particularity to at least enable the Information Officer to identify:
- 9.2.1 The record or records requested;
 - 9.2.2 The preferred language the record is requested in;
 - 9.2.3 The identity number of the requester;
 - 9.2.4 The form of access required, if the request is granted;
 - 9.2.5 The postal address or fax number of the requester.
- 9.3 The requester must also state that he 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.

- 9.4 SKG 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.
- 9.5 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 must state the manner and the particulars so required.
- 9.6 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.
- 9.7 If an individual is unable to complete the prescribed form because of illiteracy or disability, such a person may make the request verbally.
- 9.8 The requester must pay the prescribed fee, if applicable, before any further processing can take place.
- 9.9 SKG 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.

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

10.1 INTERNAL REMEDIES

SKG 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.

10.2 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.

11. FEES PAYABLE

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/inforeg/>.

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

- 11.1 A requestor is required to pay the prescribed fees before a request will be processed.
- 11.2 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).
- 11.3 A requestor may lodge an application with a court against the tender/payment of the request fee and/or deposit.
- 11.4 Records may be withheld until the fees have been paid.

12. PROTECTION OF PERSONAL INFORMATION THAT IS PROCESSED BY SKG

- 12.1 POPI provides for the minimum conditions for the lawful processing of personal information by a responsible party in chapter 3. SKG is a responsible party that processes personal information relating to both individual and juristic persons in the course and conduct of carrying on its business and rendering its services.
- 12.2 SKG determines the purpose and how personal information collected is processed. SKG will ensure that the personal information of Data Subjects that is collected is processed lawfully, fairly and transparently and in accordance with the provision of POPI with specific reference to the Conditions of Lawful Processing.

13. THE PURPOSE OF THE PROCESSING

SKG will process Personal Information in the ordinary course of its business and in relation to providing the Services. SKG will primarily use Personal Information only for the purpose for which it was originally or primarily collected. SKG may process Personal

Information for a further purpose only if such purpose constitutes a legitimate interest and is closely related to the original or primary purpose for which the Personal Information was collected. Further details on the purpose of the processing of Personal Information done by SKG can be found in SKG's Privacy Policy which is accessible on www.skg.co.za.

14. DESCRIPTION OF THE CATEGORIES OF DATA SUBJECTS AND OF THE INFORMATION OR CATEGORIES OF INFORMATION RELATING THERETO

SKG processes such information as is required in the ordinary course of its business, including, but is not limited to, the following categories of personal information:

- 14.1 First name and last name;
- 14.2 Title;
- 14.3 phone number;
- 14.4 address;
- 14.5 email address;
- 14.6 credit record;
- 14.7 photographs;
- 14.8 biometric information;
- 14.9 CCTV Footage;
- 14.10 identifying number;
- 14.11 location information;
- 14.12 online identifier;
- 14.13 demographic information;
- 14.14 gender;
- 14.15 date of birth;
- 14.16 Identity Number and/or copy of your Identity Document;
- 14.17 Passport Number,;
- 14.18 nationality;
- 14.19 language preferences;
- 14.20 bank statements,
- 14.21 agreements with third parties;
- 14.22 Company information including, but not limited to, company registration documents, Directors Personal Information, VAT and TAX information;
- 14.23 Building plans;
- 14.24 records of any interactions with SKG;
- 14.25 billing and payment details such as bank account numbers;
- 14.26 data relating to visits to SKG's Website and social media platforms, device types which accesses SKG's Website and social media platforms, IP address, location details and other technical communications information.

Further information on the description of the categories of data subjects and of the information or categories of information relating thereto, can be found in SKG's Privacy Policy which is accessible at www.skg.co.za.

15. RECIPIENTS OR CATEGORIES OF RECIPIENTS TO WHOM THE PERSONAL INFORMATION MAY BE SUPPLIED

SKG may cause Data Subjects Personal Information to be supplied to its employees, service providers, agents, other companies within the SKG group and other third parties for the purposes as set out in this manual. Further information on the recipients or categories of recipients to whom the Personal Information may be supplied can be found in SKG's Privacy Policy which is accessible at www.skg.co.za.

16. PLANNED TRANSBORDER FLOWS OF PERSONAL INFORMATION

SKG may cause Personal Information to be subjected to cross border transfer and processing and/or retention by third parties in countries that have data laws, regulations and/or legislation that offers similar protection in respect of personal information as the POPI Act or to countries which offer less protection. Further information on the planned transborder flows of personal information can be found in SKG's Privacy Policy which is accessible at www.skg.co.za.

17. A GENERAL DESCRIPTION ALLOWING A PRELIMINARY ASSESSMENT OF THE SUITABILITY OF THE INFORMATION SECURITY MEASURES TO BE IMPLEMENTED BY THE RESPONSIBLE PARTY TO ENSURE THE CONFIDENTIALITY INTEGRITY AND AVAILABILITY OF THE INFORMATION WHICH IS TO BE PROCESSED

SKG will ensure that its hosting service provider(s) attends to the hosting of its server(s), Website and other applications on the basis that they use firewalls and other applicable security measures to prevent interference and unauthorised access to Data Subjects Personal Information. SKG will further ensure that authorisations to access Data Subjects Personal Information will be limited to those who are required to access such Personal Information for the purposes as set out in this manual. Further information on SKG's security measures can be found in SKG's Privacy Policy which is accessible at www.skg.co.za.

18. PRIVACY POLICY

SKG has prepared a Privacy Policy describing its policies and procedures on the collection, use and disclosure of Data Subjects Personal Information as well as the privacy rights of Data Subjects and how the law protects Data Subjects. The Privacy Policy is obtainable from the website at www.skg.co.za or from SKG's offices or via electronic means, upon request to the Information Officer and or Deputy Information Officer.

19. 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:

- i.) Any breach of the conditions of the lawful processing of personal information set out in the POPI Act;
- ii.) Non – compliance with any obligations created in terms of the POPI Act, or
- iii.) A breach of the provisions of a code that has been issued in terms of section 60 of the POPI Act.
- iv.) The contact details of the Information Regulator are:

Physical address: JD House,
27 Stiemens Street,
Braamfontein,
Johannesburg

Postal address: P. O Box 31533,
Braamfontein,
Johannesburg,
2017

Complaints email: complaints.IR@justice.gov.za

General enquiries: info@justice.gov.za

20. OBJECTION TO THE PROCESSING OF PERSONAL INFORMATION BY A DATA SUBJECT

A Data Subject may at any time object to the processing of their personal information on reasonable grounds relating to their particular situation unless legislation provides for such processing or for purposes of direct marketing other than direct marketing by means of unsolicited electronic communication.

The prescribed form - "OBJECT to PI being processed" - in which a Data Subject may raise such an objection with SKG, can be found on the SKG Information Officer Portal: <https://www.skg.co.za/information-officer-portal/>.

21. REQUEST FOR CORRECTION OR DELETION OF PERSONAL INFORMATION

A Data Subject may, in the prescribed manner, request a responsible party to correct or delete personal information about the data subject in its possession or under its control that is inaccurate, irrelevant, excessive, out of date, incomplete, misleading or obtained unlawfully.

The prescribed form – "AMEND personal details" - in which a data subject may request for the correction of personal information with SKG, can be found on the SKG Information Officer Portal: <https://www.skg.co.za/information-officer-portal/>.

In addition, a Data Subject may, in the prescribed manner, request a responsible party to destroy or delete a record of personal information about the data subject that the responsible party is no longer authorised to retain.

The prescribed form - "DELETE personal details" - in which a data subject may request for the deletion of personal information with SKG, can be found on the SKG Information Officer Portal: <https://www.skg.co.za/information-officer-portal/>.

22. COMPLAINT REGARDING INTERFERENCE WITH THE PROTECTION OF PERSONAL INFORMATION

Any person may submit a complaint to the Regulator in the prescribed manner

and form alleging interference with the protection of the personal information of a data subject.

The prescribed form - “COMPLAINT in terms of PAIA” - in which a Data Subject may make a complaint with the Regulator, can be found on the SKG Information Officer Portal: <https://www.skg.co.za/information-officer-portal/>.

23. AVAILABILITY OF THE MANUAL

23.1 A copy of the Manual is available –

23.1.1 on www.skg.co.za;

23.1.2 at the offices of the SKG Group of companies for public inspection during normal business hours;

23.1.3 to any person upon request and upon the payment of a reasonable prescribed fee; and

23.1.4 To the Information Regulator upon request.

23.2 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.

24. UPDATING OF THE MANUAL

The Head of the SKG Group of Companies will on a regular basis update this manual.

Issued by:

SKG Properties Group