



PAIA MANUAL

26 November 2025

Document Control

Document owner	Head of Legal of Attacq Waterfall Investment Company Proprietary Limited and Head of Risk and Legal Compliance of Waterfall Investment Company Proprietary Limited
Document name	Promotion of Access to Information Act (PAIA) Manual
Reference	PAIA V2.0

This document has been approved by

Committee	Title	Name	Date of approval
Board	Board Members	Jacqueline Rouxanne van Niekerk and Werner Rudolph van Rhyn	

Change Record

Modified Date	Author	Version	Description of Changes
March 2021	Attacq Legal Team	1.0	Created Policy
November 2025	Attacq Legal Team	2.0	Updated the Policy

Next review date: 24 months from date of approval

CONFIDENTIALITY
No part of this document may be disclosed verbally or in writing, including by reproduction, to any third party without the prior written consent of the TM JVCO (as defined in this document). This document, its associated appendices and any attachments remain the property of the TM JVCO and shall be returned upon request by TM JVCO.

Table of Contents

1. Background to PAIA and purpose of the PAIA Manual	1
2. Definitions, Acronyms and Abbreviations.....	1
3. Part I – Information required in terms of section 51(1)(a) of PAIA	3
4. Part II – The Guide and the Information Officer	3
5. Part III – Public Records of TM JVCO which are available without a person having to request access in terms of PAIA (section 51(1)(b)(ii)).....	4
6. Part IV – description of Records of TM JVCO which are available in accordance with any legislation other than PAIA (section 51(1)(b)(iii)).....	4
7. Part V – subjects and categories of Records available only on Request to Access in terms of PAIA (Section 51(1)(b)(iv)).....	5
8. Part VI – Access procedure (section 51(1)(b)(iv))	5
9. Grounds for refusal of access to Records (chapter 4 of PAIA)	6
10. Access to Records held by TM JVCO	7
11. Prescribed Fees	7
12. Protection of Personal Information that is processed by TM JVCO	8
13. Availability of the PAIA Manual	9
FORM 2.....	10
Form 1	15
Annexure C	17
FORM 3.....	17

Annexures

A. Annexure A – Form 2 Request for Access to Record.....	11
B. Annexure B – Form 1 Request for a Copy of the Guide.....	16
C. Annexure C – Form 3 Outcome of Request and of Fees Payable	18
D. Annexure D – The purpose for which the TM JVCO Group processes	21
E. Annexure E – Categories of Data Subjects and Personal Information relating thereto.....	22
F. Annexure F – Recipients of Personal Information	23
G. Annexure G – Cross border flows of Personal Information.....	24
H. Annexure H – Description of security measures to be implemented by TM JVCO	25
I. Annexure I – Objection to the Processing of Personal Information in terms of Section 11(3) of POPIA by a Data Subject	26
J. Annexure J – Request for correction or deletion of Personal Information or destroying or deletion of record of Personal Information in terms of Section 24(1) of POPIA	27
K. Annexure K – Prescribed Fees.....	28

1. Background to PAIA and purpose of the PAIA Manual

PAIA (as defined below) was enacted to give effect to the provisions of section 32 of the Constitution of the Republic of South Africa, which provides that any person has a right to gain access to information held by a Public or Private Body (as defined below), when that information is required for the exercise or protection of any rights.

The key objectives of PAIA are to:

- promote transparency, accountability and effective governance of all Public and Private Bodies;
- to assist members of the public to effectively scrutinize and participate in decision making by Public Bodies;
- to ensure that the State promotes a human rights culture and social justice;
- to encourage openness; and
- to establish voluntary and mandatory mechanisms or procedures which give effect to the right of access to information in a speedy, inexpensive and effortless manner.

In terms of section 51 of PAIA, all Private Bodies are required to compile an information manual (**PAIA Manual**).

TM JVCO (as defined below) is a private company duly incorporated in the Republic of South Africa and is regarded as a Private Body in terms of PAIA.

This manual, which was prepared in accordance with section 51 of PAIA, to addresses certain requirements of POPIA and constitutes TM JVCO's PAIA Manual.

The purpose of the PAIA Manual is to give effect to the objectives of PAIA by promoting the right of access to information, fostering a culture of transparency and accountability with regard to access to information in accordance with PAIA and POPIA (defined below), and to establish mechanisms or procedures to give effect thereto.

Section 9 of PAIA recognises that the right to access information cannot be unlimited and should be subject to justifiable limitations, including, but not limited to (i) limitations aimed at the reasonable protection of privacy; (ii) commercial confidentiality; and (iii) effective, efficient and good governance.

This PAIA Manual complies with the requirements of the Guide (defined below) and recognises that the Information Regulator established under POPIA will be responsible for regulating compliance with PAIA, POPIA and their regulations.

2. Definitions, Acronyms and Abbreviations

Affiliate	a corporation, subsidiary, company, partnership or other organisation which directly or indirectly Controls, is controlled by or under common control of TM JVCO or which is associated with TM JVCO
Companies Act	Companies Act, 71 of 2008, as amended from time to time
Control	means the ability, by virtue of ownership, right of appointment, right to control election or appointment, voting rights, the ability to control the exercise of voting rights, management agreement, or agreement of any kind, to control or direct, directly or indirectly, the board or executive body or decision-making process or management of such entity
Data Subject	the person to whom Personal Information relates
Board Member	a director of TM JVCO and "Board Members" shall mean all of them

Guide	the guide referred to in section 10 of PAIA, being the guide originally compiled by the Human Rights Commission containing such information as may reasonably be required by a person who wishes to exercise any right contemplated in PAIA, which guide is to be updated by the Information Regulator to ensure that it contains such information as may reasonably be required by a person who wishes to exercise any right contemplated in both POPIA and PAIA
Information Officer	the person named at Part II of this PAIA Manual and identified as the information officer for TM JVCO;
PAIA	the Promotion of Access to Information Act, 2 of 2000, as amended from time to time
Personal Information	Information relating to an identifiable, living natural person or juristic person, including, but not limited to – <ul style="list-style-type: none"> • 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 other particular assigned to 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
POPIA	the Protection of Personal Information Act, 4 of 2013, as amended from time to time
POPIA Regulations	means the regulations promulgated in terms of section 112(2) of POPIA
Prescribed Officer	bears the meaning set out in the Companies Act
Private Body	any former or existing juristic person
Processing	means any operation or activity or any set of operations, whether or not by automatic means, concerning Personal Information, including – <ol style="list-style-type: none"> a) the collection, receipt, recording, organisation, collation, storage, updating or modification, retrieval, alteration, consultation or use; b) dissemination by means of transmission, distribution or making available in any other form; or c) merging, linking, as well as restriction, degradation, erasure or destruction of information
Public Body	(a) any department of state or administration in the national or provincial sphere of government or any municipality in the local sphere of government; or (b) any other functionary or institution when – <ol style="list-style-type: none"> a. exercising a power or performing a duty in terms of the Constitution or a provincial constitution; or b. exercising a public power or performing a public function in terms of any legislation

Record	any recorded information – (a) regardless of form or medium; (b) in the possession or under the control of that Public or Private Body, respectively; and (c) whether or not it was created by that Public or Private Body respectively
Responsible Party	means a Public or Private Body or any other person which, alone or in conjunction with others, determines the purpose of and means for processing Personal Information
Requester	in relation to a Private Body, means (i) any person, including, but not limited to, a Public Body or an official thereof, making a request for access to a Record of that Private Body; or (ii) a person acting on behalf of the person contemplated in (i)
TM JVCO	AWIC Waterfall TM JVCO (RF) Proprietary Limited, registration no. 2016/010916/07, with shareholders being Attacq Waterfall Investment Company Proprietary Limited, registration number 2000/013587/07 and Waterval Investment Company Proprietary Limited, registration number 2006/001921/07.

3. Part I – Information required in terms of section 51(1)(a) of PAIA

Name of Private Body	TM JVCO
Head of Private Body	Jacqueline Rouxanne van Niekerk (Board Member)
Postal Address	Postnet Suite 016, Private Bag X81, Halfway House, Gauteng, 1685
Physical Address	ATT House, 2 nd Floor, Maxwell Office Park, Magwa Crescent, Waterfall City, 2090
Telephone Number	010 549 1050
Email address	popia@attacq.co.za

4. Part II – The Guide and the Information Officer

The Guide contains information required by any person wishing to exercise any right set out in PAIA and POPIA, including on how to use PAIA.

The Guide is currently available for inspection in all of the official languages of South Africa at the offices of the Information Regulator at 54 Maxwell Drive, Woodmead, Johannesburg, telephone number: 010 023 5200 OR on its website – <https://inforegulator.org.za/>. Any request for public inspection of the Guide at the office of the Information Regulator or a request for a copy of the Guide from the Information Regulator must substantially correspond with Form 1 of Annexure A to Government Notice No. R.757 dated 27 August 2021 promulgated under the PAIA Regulations which (available on the website on the Information Regulator: [InfoRegSA-PAIA-Form01-Reg2.pdf](#) and also attached as **Annexure B**). Any queries regarding the guide should be directed to –

The Information Regulator
54 Maxwell Drive, Woodmead, Johannesburg
+27 10 023 5200
enquiries@inforegulator.org.za

In terms of Regulation 3 of the PAIA Regulations, 2021, the Information Officer must have a copy of the Guide at the registered head office for public inspection during normal office hours. The Information Officer must make available, upon written request of any person, copies of the Guide as requested. The Requester must complete the prescribed Form 1 (available on the website of the Information Regulator: [InfoRegSA-PAIA-Form01-Reg3.pdf](#)).

TM JVCO has appointed an Information Officer in accordance with POPIA. In addition to its obligations prescribed under POPIA, the designated Information Officer is also responsible for

assessing any requests to TM JVCO for access to information in terms of PAIA as well as to oversee any other obligations which TM JVCO may have under POPIA.

The Information Officer may appoint Deputy Information Officers to assist it in the fulfilment of its obligations.

The contact details of the Information Officer are:

Information Officer	Jacqueline Rouxanne van Niekerk (Board Member)
Physical Address	ATT House, 2 nd Floor, Maxwell Office Park, Magwa Crescent, Waterfall City, 2090
Telephone Number	010 549 1050
Email address	popia@attacq.co.za

5. Part III – Public Records of TM JVCO which are available without a person having to request access in terms of PAIA (section 51(1)(b)(ii))

Any Records of a public nature are made available for inspection by interested parties. Such public information includes all information made available on TM JVCO's website (<https://waterfallcity.co.za/>), which includes, without limitation this PAIA Manual.

Other non-confidential records, such as statutory records maintained at CIPC, may also be accessed without the need to submit a formal application.

6. Part IV – description of Records of TM JVCO which are available in accordance with any legislation other than PAIA (section 51(1)(b)(iii))

TM JVCO also retains Records in terms of certain legislation that applies to its business and operations. The legislation includes but is not limited to the legislation listed below. Unless disclosure is prohibited in terms of applicable legislation, regulations, contractual agreement or otherwise, Records that are required to be made available in terms of applicable legislation shall be made available for inspection by interested parties who are entitled to such information subject to the relevant legislation and applicable TM JVCO policies and procedures. Unless such Records are of a public nature, any request for access to such Records must be done in accordance with the requirements of PAIA.

- Administration of Estates Act 66 of 1965
- Basic Conditions of Employment Act 75 of 1997
- Broad Based Black Economic Empowerment Act 53 of 2003
- Administrative Adjudication of Road Traffic Offences Act 46 of 1998
- Close Corporations Act 69 of 1984
- Companies Act 71 of 2008
- Compensation for Occupational Injuries and Health Diseases Act 130 of 1993
- Consumer Protection Act 68 of 2008
- Deeds Registries Act 47 of 1937
- Electronic Communications and Transactions Act 25 of 2002
- Employment Equity Act 55 of 1998
- Income Tax Act 58 of 1962
- Insolvency Act 24 of 1936
- Labour Relations Act 66 of 1995
- National Building Regulations and Building Standards Act 03 of 1977
- National Credit Act 34 of 2005
- National Environmental Management Act 107 of 1998
- National Heritage Resources Act, No 25 of 1999
- National Land Transport Act 5 of 2009
- Prescription Act 68 of 1969
- Prevention of Illegal Eviction from and unlawful occupation of Land Act 19 of 1998
- Property Practitioners Act 22 of 2019
- Trade Marks Act 194 of 1993
- Unemployment Insurance Act 63 of 2001
- Value Added Tax Act 89 of 1991.

* Although we have used our best endeavours to provide a list of applicable legislation, this list is not exhaustive and may not be complete and may be updated by TM JVCO from time to time. If a Requester believes that a right of access to a Record exists in terms of legislation not listed above, the Requester is required to provide details thereof to the Information Officer for consideration.

7. Part V – subjects and categories of Records available only on Request to Access in terms of PAIA (Section 51(1)(b)(iv))

This Part V sets out the categories of Records that TM JVCO holds.

Please note that access to the Records may be subject to the grounds of refusal as set out in PAIA and referenced in this PAIA Manual. In addition to the standard access requirements under PAIA, access to Records deemed confidential to a third party will be subject to consent by the third party concerned.

Corporate Governance Records	<ul style="list-style-type: none"> • Memorandum of Incorporation, as amended (if applicable) and any Rules • Records in respect of the directors as required in terms of section 24(3) of the Companies Act • Reports to annual meetings, and annual financial statements • Minutes of meetings of the board of directors and shareholders • Register of directors • Statutory registers (including the securities register) • Registered office of a company • Company annual returns • Records relating to the appointment of auditors, directors, prescribed officers, public officer and secretary • Policies
Accounting Records	<ul style="list-style-type: none"> • Annual financial statements • Banking records, bank statements, electronic banking records • Audit reports •

B-BBEE Records	<ul style="list-style-type: none"> • B-BBEE annual compliance report • B-BBEE certificate
Operations Records and Intellectual Property	<ul style="list-style-type: none"> • General correspondence • Patents, copyright and trademark related documents
Marketing and Communication Records	<ul style="list-style-type: none"> • Advertising and promotional material • Proposal documents • Communication strategies • Brand information management • New business development • Marketing strategies
Information Management and Technology records	<ul style="list-style-type: none"> • Computer/mobile device usage policy documentation • Disaster recovery plans • Hardware asset registers • Information security policies/standards/procedures • Information technology systems and user manuals • Information usage policy documentation • Project implementation plans • Software licensing • System documentation and manuals • Website

8. Part VI – Access procedure (section 51(1)(b)(iv))

The Requester must comply with all the procedural requirements of PAIA relating to the request for access to a Record, whether listed in this PAIA Manual or not.

The Requester must complete the prescribed Form 2 of Annexure A to Government Notice No. R.757 dated 27 August 2020 promulgated under the PAIA Regulations (available on the website of the Information Regulator: infoRegSA-PAIA-Form02-Reg7.pdf (infoRegulator.org.za), also attached as

Annexure A for reference. The form must be submitted with a request fee (see section 11 below) to the Information Officer (see contact details at section 4 above).

When completing the prescribed form, the Requestor must –

- identify the Records requested and its identity (including the postal address, facsimile number or email address of the Requester);
- identify the right that the Requester is seeking to protect;
- provide an explanation of why the requested Record is required for the exercise or protection of any right;
- state the manner in which it wishes to be informed of the outcome of an access request (where in any manner other than a written reply);
- if the request is made on behalf of another person, submit proof of the capacity in terms of which the Requester is making the request, to the reasonable satisfaction of the Information Officer.

TM JVCO will inform the Requester within 30 (thirty) days after receipt of the request of its decision whether or not to grant the request.

The 30 (thirty) day period may be extended by a further 30 (thirty) day period if the request is for a large number of Records or requires TM JVCO to search through a large volume of Records or the Records are not kept at the offices of TM JVCO.

The Information Officer will inform the requester of the decision, and the fees payable as set out in **Annexure C** (if applicable) on a form that corresponds substantially with Form 3 of Annexure A to Government Notice No. R.757 dated 27 August 2021 promulgated under the PAIA Regulations ((available on the website of the Information Regulator: [Form-3-PAIA.pdf](#)).

Where the Information Officer –

1. grants the request, the notice will set out the access fee (if any) to be paid (see section 11 below) and the form in which the access will be given; and
2. refuses the request, the notice will disclose the reasons for the refusal, including those grounds of refusal under PAIA.

Where the Requestor disputes the fee, the form of access granted or any refusal to access, the Requester may apply to a Court with appropriate jurisdiction for relief.

9. Grounds for refusal of access to Records (chapter 4 of PAIA)

In addition and subject to sections 7 and 70 of PAIA, the main grounds on which TM JVCO may refuse a request for information as contemplated in PAIA are:

- 9.1 mandatory protection of the privacy of a third party who is a natural person, which would involve the unreasonable disclosure of Personal Information of that natural person;
- 9.2 mandatory protection of commercial information of a third party, if the Record contains –
 - 9.2.1 trade secrets of that third party;
 - 9.2.2 financial, commercial, scientific or technical information which disclosure could likely cause harm to the financial or commercial interests of that third party;
 - 9.2.3 information disclosed in confidence by a third party to TM JVCO, if the disclosure of that information could reasonably be expected –
 - 9.2.3.1 to put that third party at a disadvantage in contractual or other negotiations; or
 - 9.2.3.2 to prejudice that third party in commercial competition;
 - 9.2.4 mandatory protection of confidential information if the disclosure would constitute a breach of a duty or confidence owed to a third party in terms of any agreement;
 - 9.2.5 mandatory protection of the safety of individuals and the protection of safety of property;

- 9.2.6 mandatory protection of Records which would be regarded as privileged in legal proceedings;
- 9.2.7 the protection of the commercial activities of TM JVCO, which include, but are not limited to –
 - 9.2.7.1 trade secrets of TM JVCO;
 - 9.2.7.2 financial, commercial, scientific or technical information which disclosure could likely cause harm to the financial or commercial interests of TM JVCO;
 - 9.2.7.3 information which, if disclosed, could put TM JVCO at a disadvantage in negotiations or commercial competition;
 - 9.2.7.4 a computer program which is owned by TM JVCO and which is protected by copyright except insofar as TM JVCO is required to give access to a Record to which access is granted in terms of PAIA; and
 - 9.2.7.5 research information of TM JVCO or a third party on behalf of TM JVCO, if the disclosure would expose the third party, TM JVCO, and/or the researcher of the subject matter of the research to serious disadvantage.

10. Access to Records held by TM JVCO

Records held by the TM JVCO Group may be accessed by requests only once the prerequisite requirements for access have been met.

There are two types of Requesters:

- Personal Requester
 - This is a Requester who is seeking access to a record containing Personal Information about the Requester.
 - TM JVCO will voluntarily provide the requested information or give access to any Record with regard to the Requester's Personal Information. The prescribed fee for reproduction of the information requested will be charged.
- Other Requester
 - This is a Requester who requests access to information on third parties.
 - In considering such a request, TM JVCO will adhere to the provisions of PAIA. Section 71 requires that the Information Officer take all reasonable steps to inform a third party to whom the requested record relates of the request, informing him/her that he/she may make a written or oral representation to the Information Officer why the request should be refused or, where required, give written consent for the disclosure of the information.
 - TM JVCO is not obliged to voluntarily grant access to such Records. The Requester must fulfil the prerequisite requirements, in accordance with the requirements of PAIA and as stipulated in Chapter 5: Part 3, including the payment of a request and access fee.

11. Prescribed Fees

PAIA provides for two types of fees, namely:

- a request fee of R140.00, which is a form of administration fee to be paid by all Requesters except Personal Requesters, before the request is considered and is not refundable; and
- an access fee, which is paid by all Requesters in the event that a request for access is granted. This fee is inclusive of costs involved by TM JVCO in obtaining and preparing a Record for delivery to the Requester. These fees are set out in **Annexure K**.

Section 54 of PAIA entitles GABS to levy a charge or to request a fee to enable it to recover the cost of processing a request and providing access to records. The fees that may be charged are set out in Annexure B of Government Notice No. R.757 dated 27 August 2021 promulgated under the PAIA Regulations.

Where a decision to grant a request has been taken, the record will not be disclosed until the necessary fees have been paid in full.

12. Protection of Personal Information that is processed by TM JVCO

Chapter 3 of POPIA provides for the minimum conditions for lawful Processing of Personal Information by a Responsible Party. These conditions may not be derogated from unless specific exclusions apply as outlined in POPIA.

TM JVCO requires Personal Information relating to both individual and juristic persons in order to carry out its business and organisational functions. The manner in which this information is Processed and the purpose for which it is processed is determined by TM JVCO. Accordingly, TM JVCO is a Responsible Party for the purposes of POPIA and will ensure that the Personal Information of a Data Subject, amongst other things as prescribed by POPIA:

- is processed lawfully, fairly and transparently. This includes the provision of appropriate information to Data Subjects when their data is collected by TM JVCO, in the form of privacy or data collection notices. TM JVCO must also have a legal basis (for example, but not limited to, consent) to process Personal Information;
- is processed only for the purposes for which it was collected;
- will not be processed for a secondary purpose unless that Processing is compatible with the original purpose;
- is adequate, relevant and not excessive for the purposes for which it was collected;
- is accurate and kept up to date;
- will not be kept for longer than necessary;
- is processed in accordance with integrity and confidentiality principles – this includes physical and organisational measures to ensure that Personal Information, in both physical and electronic form, is subject to an appropriate level of security when stored, used and communicated by TM JVCO, in order to protect against access and acquisition by unauthorised persons and accidental loss, destruction or damage;
- is processed in accordance with the rights of Data Subjects, where applicable. Data Subjects have the right to:
 - be notified that their Personal Information is being collected by TM JVCO . The Data Subject also has the right to be notified in the event of a data breach;
 - know whether TM JVCO holds Personal Information about them and to access that information. Any request for information must be handled in accordance with the provisions of this PAIA Manual;
 - request the correction or deletion of inaccurate, irrelevant, excessive, out of date, incomplete, misleading or unlawfully obtained Personal Information;
 - object to TM JVCO 's use of their Personal Information and request the deletion of such Personal Information (deletion would be subject to TM JVCO 's record keeping requirements);
 - object to the Processing of Personal Information for purposes of direct marketing by means of unsolicited electronic communications; and
 - complain to the Information Regulator regarding an alleged infringement of any of the rights protected under POPIA and to institute civil proceedings regarding the alleged non-compliance with the protection of his, her or its Personal Information.

13.1 Purpose of the Processing of Personal Information by TM JVCO

As abovementioned, Personal Information held by TM JVCO can only be processed for a specific purpose. The purpose for which TM JVCO processes or will process Personal Information is set out in **Annexure D**, provided however that this is not an exhaustive list, with the specific purpose of processing being detailed in privacy and data collection notices.

13.2 Categories of Data Subjects and Personal Information relating thereto

As stipulated by section 1 of POPIA, a Data Subject may either be a natural or a juristic person. The various categories of Data Subjects that TM JVCO processes Personal Information in respect of and the types of Personal Information relating thereto includes but is not limited to those detailed in **Annexure E**.

13.3 Recipients of Personal Information

The recipients to whom TM JVCO may provide a Data Subject's Personal Information includes but is not limited to those detailed in **Annexure F**.

13.4 Cross-border flows of Personal Information

Section 72 of POPIA provides that Personal Information may only be transferred out of the Republic of South Africa if the:

- recipient country can offer such data an "adequate level" of protection. This means that its data privacy laws must be substantially similar to the Conditions for Lawful Processing as contained in POPIA; or
- Data Subjects consent to the transfer of their Personal Information; or
- transfer is necessary for the performance of a contractual obligation between the Data Subject and the Responsible Party; or
- transfer is necessary for the performance of a contractual obligation between the Responsible Party and a third party, in the interests of the Data Subject; or
- the transfer is for the benefit of the Data Subject, and it is not reasonably practicable to obtain the consent of the Data Subject, and if it were, the Data Subject, would in all likelihood provide such consent.

Planned cross-border transfers of Personal Information and the justifications therefor includes but is not limited to those detailed in **Annexure G**.

13.5 Description of information security measures to be implemented by TM JVCO

Annexure F sets out the types of security measures to be implemented by TM JVCO in order to ensure that Personal Information is respected and protected. This is not an exhaustive list and is subject to change. A preliminary assessment of the suitability of the information security measures implemented or to be implemented by TM JVCO may be conducted in order to ensure that the Personal Information that is processed by TM JVCO is safeguarded and processed in accordance with the Conditions for Lawful Processing.

13.6 Objection to the Processing of Personal Information by a Data Subject

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 attached to this manual as **Annexure I** subject to exceptions contained in POPIA.

13.7 Request for correction or deletion of Personal Information

Section 24 of POPIA and regulation 3 of the POPIA Regulations provides that a Data Subject may request for their Personal Information to be corrected/deleted in the prescribed form attached as **Annexure J**.

13. Availability of the PAIA Manual

This PAIA Manual is made available in terms of PAIA and section 4 of the POPIA Regulations.

This PAIA Manual is also available at <https://waterfallcity.co.za/> and from the Information Regulator.

This PAIA Manual is further available at the offices of TM JVCO situated at **ATT House, 2nd Floor, Maxwell Office Park, Magwa Crescent, Waterfall City, 2090**, for inspection during normal business hours.

Copies of the PAIA Manual can be obtained from the Information Officer. A fee will be levied for copies of the PAIA Manual in accordance with paragraph 12 above.

FORM 2

REQUEST FOR ACCESS TO RECORD

[Regulation 7]

NOTE:

1. Proof of identity must be attached by the requester.
2. If requests made on behalf of another person, proof of such authorisation, must be attached to this form.

TO: Information Officer

(Address)

E-mail address: _____

Fax number: _____

Mark with an "X"

Request is made in my own name

Request is made on behalf of another person.

PERSONAL INFORMATION			
Full Names			
Identity Number			
Capacity in which request is made (when made on behalf of another person)			
Postal Address			
Street Address			
E-mail Address			
Contact Numbers	Tel. (B):		Facsimile: _____
	Cellular:		
Full names of person on whose behalf request is made (if applicable):			
Identity Number			

Postal Address			
Street Address			
E-mail Address			
Contact Numbers	Tel. (B)		Facsimile
	Cellular		
PARTICULARS OF RECORD REQUESTED			
<i>Provide full particulars of the record to which access is requested, including the reference number if that is known to you, to enable the record to be located. (If the provided space is inadequate, please continue on a separate page and attach it to this form. All additional pages must be signed.)</i>			
Description of record or relevant part of the record:			
Reference number, if available			
Any further particulars of record			
TYPE OF RECORD <i>(Mark the applicable box with an "X")</i>			
Record is in written or printed form			
Record comprises virtual images <i>(this includes photographs, slides, video recordings, computer-generated images, sketches, etc)</i>			
Record consists of recorded words or information which can be reproduced in sound			
Record is held on a computer or in an electronic, or machine-readable form			

FORM OF ACCESS <i>(Mark the applicable box with an "X")</i>	
Printed copy of record <i>(including copies of any virtual images, transcriptions and information held on computer or in an electronic or machine-readable form)</i>	
Written or printed transcription of virtual images <i>(this includes photographs, slides, video recordings, computer-generated images, sketches, etc)</i>	
Transcription of soundtrack <i>(written or printed document)</i>	
Copy of record on flash drive <i>(including virtual images and soundtracks)</i>	
Copy of record on compact disc drive <i>(including virtual images and soundtracks)</i>	
Copy of record saved on cloud storage server	

MANNER OF ACCESS <i>(Mark the applicable box with an "X")</i>	
Personal inspection of record at registered address of public/private body <i>(including listening to recorded words, information which can be reproduced in sound, or information held on computer or in an electronic or machine-readable form)</i>	
Postal services to postal address	
Postal services to street address	
Courier service to street address	
Facsimile of information in written or printed format <i>(including transcriptions)</i>	
E-mail of information <i>(including soundtracks if possible)</i>	
Cloud share/file transfer	
Preferred language <i>(Note that if the record is not available in the language you prefer, access may be granted in the language in which the record is available)</i>	

PARTICULARS OF RIGHT TO BE EXERCISED OR PROTECTED	
<i>If the provided space is inadequate, please continue on a separate page and attach it to this Form. The requester must sign all the additional pages.</i>	
Indicate which right is to be exercised or protected	
Explain why the record requested is required for the exercise or protection of the	

aforementioned right:	
-----------------------	--

FEES	
a)	A request fee must be paid before the request will be considered.
b)	You will be notified of the amount of the access fee to be paid.
c)	The fee payable for access to a record depends on the form in which access is required and the reasonable time required to search for and prepare a record.
d)	If you qualify for exemption of the payment of any fee, please state the reason for exemption
Reason	

You will be notified in writing whether your request has been approved or denied and if approved the costs relating to your request, if any. Please indicate your preferred manner of correspondence:

Postal address	Facsimile	Electronic communication (Please specify)

Signed at _____ this _____ day of _____ 20 _____

Signature of Requester / person on whose behalf request is made

FOR OFFICIAL USE

Reference number:	
Request received by: (State Rank, Name And Surname of Information Officer)	
Date received:	
Access fees:	
Deposit (if any):	

Signature of Information Officer

FOR OFFICIAL USE

Reference number:	
-------------------	--

Request received by: (state rank, name and surname of information officer)	
Date received:	
Access fees:	
Deposit (if any):	

Signature of Information Officer

Form 1

REQUEST FOR A COPY OF THE GUIDE

[Regulations 2 and 3]

TO: The Information Regulator
 P.O. Box 31533
 Braamfontein
 2017
 Email address:
 Tel number: +27 (0) 10 023 5200

OR

The Information Officer

I,

Full names:				
In my capacity as (mark with "X")	Information Officer		Other	
Name of public/private body (if applicable)				
Postal Address:				
Street Address:				
Email Address:				
Facsimile:				
Contact numbers:	Tel. (B):		Cellular:	

hereby request the following copy(ies) of the guide:

Language (make with "X")	No. of copies	Language (make with "X")	No. of copies
--------------------------	---------------	--------------------------	---------------

	Sepedi			Sesotho	
	Setswana			siSwati	
	Tshivenda			Xitsonga	
	Afrikaans			English	
	isiNdebele			IsiXhosa	
	isiZulu				

Manner of collection (mark with 'x')

Postal address	Facsimile	Electronic communication (please specify)

Signed at _____ on this _____ day of _____ 20_____

FORM 3

OUTCOME OF REQUEST AND OF FEES PAYABLE

[Regulation 8]

Note:

1. If your request is granted the-
 - a) amount of the deposit, (if any), is payable before your request is processed; and
 - b) requested record/portion of the record will only be released once proof of full payment is received.

Please use the reference number hereunder in all future correspondence.

Reference number: _____

TO: _____

Your request dated _____, refers.

You requested:

Personal inspection of information at the registered address of Attacq (including listening to recorded words, information which can be reproduced in sound, or information held on computer or in an electronic or machine-readable form) is free of charge. You are required to make an appointment for the inspection of the information and to bring this Form with you. If you then require any form of reproduction of the information, you are liable for the fees prescribed in Error! Reference source not found..	
--	--

OR

You requested:

Printed copies of the information (including copies of an virtual images, transcriptions and information held on computer or in an electronic or machine readable form)	
Written or printed transcription of virtual images (this includes photographs, slides, video recordings, computer-generated images, sketches, etc.)	
Transcription of soundtrack (written or printed document)	
Copy of information on flash drive (including virtual images and soundtracks)	
Copy of information on compact disc drive (including virtual images and soundtracks)	
Copy of record saved on cloud storage server	

To be submitted:

Postal services to postal address	
Postal services to street address	

Courier service to street address	
Facsimile of information in written or printed format (including transcriptions)	
E-mail of information (including soundtracks if possible)	
Cloud share/file transfer	
Preferred language: (Note that if the record is not available in the language you prefer, access may be granted in the language in which the record is available)	

Kindly note that your request has been:

Approved

Denied for the following reasons:

Fees payable with regards to your request:

Item	Cost per A4-size page or part thereof/item	Number of pages/items	Total
Photocopy			
Printed copy			
For a copy in a computer-readable form on:			
(i) Flash drive (to be provided by requestor)	R40.00		
(ii) Compact disc	R40.00		
• If provided by requestor	R60.00		
• If provided to the requestor			
For a transcription of visual images per A4-size page	Service to be outsourced. Will depend on quotation from Service provider.		
Copy of visual images			
Transcription of an audio record, per A4-size page	R24.00		
Copy of an audio record on:			
(i) Flash drive (to be provided by requestor)	R40.00		
(ii) Compact disc	R40.00		
	R60.00		

<ul style="list-style-type: none"> • If provided by requestor • If provided to the requestor 			
Postage, e-mail or any other electronic transfer:	Actual costs		
TOTAL			

Deposit payable (if search exceeds six hours):

Yes No

Hours of search		Amount of deposit (calculated on one third of total amount per request)	
-----------------	--	--	--

The amount must be paid into the following Bank account:

Name of bank: _____

Name of account holder: _____

Type of account: _____

Account number: _____

Branch code: _____

Reference number: _____

Submit proof of payment to: _____

Signed at _____ on this _____ day of _____ 20_____

Signature of Information Officer

Processing of Personal Information in accordance with POPIA

1. For a shareholder, director or prescribed officer

- 1.1. Verification of shareholder, director or prescribed officer information
- 1.2. Any other reasonably required purpose relating to the relationship between TM JVCO and its shareholder, director or prescribed officer including the payment of any monies to such persons

2. For vendors/ suppliers/other businesses

- 2.1. Verifying information and performing related checks
- 2.2. Purposes relating to the actual or potential agreement or business relationship between the parties
- 2.3. Payment of invoices
- 2.4. Complying with TM JVCO's regulatory and other obligations
- 2.5. Any other lawful purpose relating to TM JVCO's business

3. Prospective tenants

- 3.1. Verifying information
- 3.2. Purposes relating to a possible lease agreement between the prospective tenant and an Affiliate of TM JVCO
- 3.3. Any other legitimate purpose relating to TM JVCO's business

Categories of Data Subjects and Personal Information relating thereto

1. Corporate

- 1.1. Shareholders
- 1.2. Directors
- 1.3. Prescribed Officers

2. Vendors / suppliers/ other businesses

- 2.1. Name and contact details
- 2.2. Identity and/or company information and directors' information
- 2.3. Banking and financial information
- 2.4. Information about products or services
- 2.5. Other information not specified, reasonably required to be processed for business operations
- 2.6. "know-your customer" data
- 2.7. Payment beneficiaries – bank account details
- 2.8. Tax certificates
- 2.9. Professional curriculum vitae
- 2.10. B-BBEE certificates

3. Prospective tenants

- 3.1. Name and contact details
- 3.2. Identity and/or company information and directors' information
- 3.3. Banking and financial information
- 3.4. If signing surety, details of assets and liabilities, previous insolvency details (if applicable), marital status
- 3.5. Trading references
- 3.6. Other lessor references
- 3.7. Other information not specified, reasonably required to be processed for lease relationship
- 3.8. "know-your customer" data

Recipients of Personal Information

1. Any firm, organisation or person that TM JVCO uses to collect payments and recover debts or to provide a service on its behalf
2. Any firm, organisation or person that provides TM JVCO with products or services
3. Any payment system that TM JVCO uses
4. Regulatory and governmental authorities or ombudsmen, or other authorities, including tax authorities, where TM JVCO has a duty to share information
5. Financial institutions from whom payments are received on behalf of Data Subjects
6. Shareholders, directors and prescribed officers of TM JVCO
7. Agents and estate agent brokers

Cross-border flows of Personal Information

Sometimes information will be sent to countries outside South Africa, in which case TM JVCO will fully comply with applicable data privacy and protection legislation. This may happen if the TM JVCO servers or suppliers and service providers are based outside South Africa, or if the TM JVCO' services are hosted in systems or servers outside South Africa and/or if a data subject uses TM JVCO' services while visiting countries outside this area. These countries may not have data-protection laws which are similar to those of South Africa.

If TM JVCO transfers personal information outside of South Africa, TM JVCO will make sure that the information is protected in the same way as if it was being used in South Africa. TM JVCO will use one of the following safeguards:

- (i) transfer to another country whose privacy legislation ensures an adequate level of protection of personal information similar or equivalent to South Africa; or
- (ii) put in place a contract with the third-party that means they must protect personal information to the same standards as South Africa.

Description of security measures to be implemented by TM JVCO

TM JVCO undertakes to institute and maintain data protection measures to accomplish the objectives outlined below. The details given are to be interpreted as examples of how to achieve an adequate data protection level for each objective. TM JVCO may use alternative measures and adapt to technological security development, as needed, provided that the objectives are achieved.

1. Access control of persons

TM JVCO will implement suitable measures in order to prevent unauthorised persons from gaining access to the data processing equipment where the data is processed.

2. Data media control

TM JVCO undertakes to implement suitable measures to prevent the unauthorised manipulation of media, including reading, copying, alteration or removal of the data media used by TM JVCO and containing personal data of customers, prospective tenants of an Affiliate of TM JVCO, suppliers, shareholders, directors, prescribed officers and so forth.

3. Data memory control

TM JVCO undertakes to implement suitable measures to prevent unauthorised input into data memory and the unauthorised reading, alteration or deletion of stored data.

4. User control

TM JVCO will implement suitable measures to prevent its data processing systems from being used by unauthorised persons by means of data transmission equipment.

5. Access control to data

TM JVCO represents that the persons entitled to use TM JVCO's data processing system are only able to access the data within the scope and to the extent covered by their respective access permission (authorization).

6. Transmission control

TM JVCO will be obliged to enable the verification and tracing of the locations/destinations to which the Personal Information is transferred by utilizing TM JVCO's data communication equipment/ devices.

7. Transport control

TM JVCO will implement suitable measures to prevent Personal Information from being read, copied, altered or deleted by unauthorised persons during the transmission thereof or during the transport of the data media.

8. Organisation control

TM JVCO will maintain its internal organisation in a manner that meets the requirements of this manual.

Objection to the Processing of Personal Information in terms of Section 11(3) of POPIA by a Data Subject

Regulations relating to the protection of Personal Information, 2018
[Regulation 2(1)]

Note:

1. Affidavits or other documentary evidence as applicable in support of the objection may be attached.
2. If the space provided for in this Form is inadequate, submit information as an annexure to this Form and sign each page.
3. Complete as is applicable.

A	DETAILS OF DATA SUBJECT	
	Name(s) and surname/ registered name of Data Subject	
	Unique identifier / Identity Number	
	Residential, postal or business address	
	Contact number(s)	
	Fax number / e-mail address	
B	DETAILS OF RESPONSIBLE PARTY	
	Name(s) and surname/ registered name of Data Subject	
	Residential, postal or business address	
	Contact number(s)	
	fax number / email address	
C	REASONS FOR OBJECTION (Please provide detailed reasons for the objection)	

Signed atthis.....day of20.....

Signature of Data Subject

**Request for correction or deletion of Personal Information or destroying or deletion of record of
Personal Information in terms of Section 24(1) of POPIA**

Regulations relating to the protection of Personal Information, 2018

[Regulation 3(2)]

Note:

1. Affidavits or other documentary evidence as applicable in support of the request may be attached.
2. If the space provided for in this Form is inadequate, submit information as an Annexure to this Form and sign each page.
3. Complete as is applicable.

Mark the appropriate box with an "X".

Request for:

- Correction or deletion of the Personal Information about the Data Subject which is in possession or under the control of the Responsible Party.
- Destroying or deletion of a record of Personal Information about the Data Subject which is in possession or under the control of the Responsible Party and who is no longer authorized to retain the record of information.

A	Details of Data Subject	
	Names(s) and surname/ registered name of Data Subject	
	Unique Identifier/ Identity Number	
	Residential, postal or business address	
	Contact number(s)	
	Fax number / email address	
B	DETAILS OF RESPONSIBLE PARTY	
	Name(s) and surname/ registered name of Data Subject	
	Residential, postal or business address	
	Contact number(s)	
	Fax number / email address	
C	REASONS FOR *CORRECTION OR DELETION OF THE PERSONAL INFORMATION ABOUT THE DATA SUBJECT/*DESTRUCTION OR DELETION OF A RECORD OF PERSONAL INFORMATION ABOUT THE DATA SUBJECT WHICH IS IN POSSESSION OR UNDER THE CONTROL OF THE RESPONSIBLE PARTY. (Please provide detailed reasons for the request)	

FEES IN RESPECT OF PRIVATE BODIES

Item	Description	Amount
1.	The request fee payable by every requester	R140.00
2.	Photocopy of A4-size page	R2.00 per page or part thereof
3.	Printed copy of A4-size page	R2.00 per page or part thereof
4.	For a copy in a computer-readable form on; (i) Flash drive (to be provided by requestor) (ii) Compact disc <ul style="list-style-type: none"> • If provided by requestor • If provided to the requestor 	R40.00 R40.00 R60.00
5.	For a transcription of visual images	Service to be outsourced. Will depend on quotation from Service provider.
6.	Copy of visual images	Service to be outsourced. Will depend on quotation from Service provider
7.	Transcription of an audio record, per A4-size page	R24.00
8.	Copy of an audio record on: (iii) Flash drive (to be provided by requestor) (iv) Compact disc <ul style="list-style-type: none"> • If provided by requestor • If provided to the requestor 	R40.00 R40.00 R60.00
9.	To search for and prepare the record for disclosure for each hour or part of an hour, excluding the first hour, reasonably required for such search and preparation. To not exceed a total cost of	R145.00 R435.00
10.	Deposit: If search exceeds 6 hours	One third of amount per request calculated in terms of items 2 to 8.

11.	Postage, e-mail or any other electronic transfer	Actual expense, if any.
-----	--	-------------------------

Description		Rand
1	The fee for a copy of the manual as contemplated in regulation 9(2)(c) - for every photocopy of an A4-size page or part thereof.	1,10
2	The fees for reproduction referred to in regulation 11(1) are as follows:	
(a)	For every photocopy of an A4-size page or part thereof	1,10
(b)	For every printed copy of an A4-size page or part thereof held on a computer or in electronic or machine-readable form	0,75
(c)	For a copy in a computer-readable form on -	
(i)	portable storage device	7,50
(ii)	compact disc	70,00
(d)(i)	For a transcription of visual images, for an A4-size page or part thereof	40,00
(ii)	For a copy of visual images	60,00
(e)(i)	For a transcription of an audio record, for an A4-size page or part thereof	20,00
(ii)	For a copy of an audio record	30,00
3	The request fee payable by a requester, other than a personal requester, referred to in regulation 11(2)	50,00
4	The access fees payable by a requester referred to in regulation 11(3) are as follows:	
4.1(a)	For every photocopy of an A4-size page or part thereof	1,10
(b)	For every printed copy of an A4-size page or part thereof held on a computer or in electronic or machine readable form	0,75
(c)	For a copy in a computer-readable form on -	
(i)	portable storage device	7,50

(ii)	compact disc	70,00
(d)(i)	For a transcription of visual images, for an A4-size page or part thereof	40,00
(ii)	For a copy of visual images	60,00
(e)(i)	For a transcription of an audio record, for an A4-size page or part thereof	20,00
(ii)	For a copy of an audio record	30,00
(f)	To search for and prepare the record for disclosure, R30,00 for each hour or part of an hour reasonably required for such search and preparation.	
4.2	For purposes of section 54(2) of the Act, the following applies:	
(a)	Six hours as the hours to be exceeded before a deposit is payable; and	
(b)	one third of the access fee is payable as a deposit by the requester.	
4.3	The actual postage is payable when a copy of a record must be posted to a requester.	