

Access to Information Manual

Private Property (Pty) Ltd



**PRIVATE
PROPERTY**

Revision Date: 14/12/2021

Contents

| | |
|---|---|
| 1. Introduction | 3 |
| 2. Company Details | 3 |
| 3. Guidance..... | 3 |
| 4. Records held..... | 3 |
| 4.1. Company Records..... | 4 |
| 4.2. Personnel Records | 4 |
| 4.3. Business Records..... | 4 |
| 4.4. Customer Records..... | 5 |
| 4.5. Policies..... | 5 |
| 4.6. Publications | 5 |
| 4.7. Information held to comply with other legislation..... | 5 |
| 5. Requesting Access to a Record..... | 7 |
| 6. Processing of Personal Information | 8 |
| 6.1. Purpose of Processing | 8 |
| 6.2. Categories of Data Subjects..... | 8 |
| 6.3. Categories of Personal Information | 8 |
| 6.4. Cross-border data transfers..... | 8 |
| 6.5. Third-party disclosures..... | 8 |
| 7. Availability | 9 |

1. Introduction

Private Property is an online property portal, and the purpose of this manual is to provide the public with an understanding of which types of information we hold and how to make a request for access to that information.

2. Company Details

Company Name: Private Property (Pty) Ltd

Registration Number: 2012/065291/07

Postal Address: Caxton House, 368 Jan Smuts Avenue, Craighall, Johannesburg, 2196

Physical Address: Caxton House, 368 Jan Smuts Avenue, Craighall, Johannesburg, 2196

Phone Number: 087 351 1166

Information Officer by Default: Amasi Mwela

Designated Information Officer: Eugène Duvenage

Email: privacy@privateproperty.co.za

Website: <https://www.privateproperty.co.za>

3. Guidance

The information regulator provides additional guidance in all official languages on how to exercise a right under PAIA. The guides are available here:

<https://www.justice.gov.za/inforeg/docs.html>.

Contact details for the information regulator are:

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

Physical Address: D House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001

General Email: enquiries@inforegulator.org.za

POPIA Complaints: POPIAComplaints@inforegulator.org.za

PAIA Complaints: POPIAComplaints@inforegulator.org.za

4. Records held

Private Property holds the following categories of records:

- Company records
- Personnel records

- Business records
- Customer records
- Policies
- Publications
- Information held to comply with other legislation

4.1. Company Records

Company records relate to the incorporation and administration of Private Property and can be accessed via the Companies and Intellectual Property Commission (CIPC).

| Record Type | Availability |
|-----------------------|-----------------------------------|
| Company Incorporation | Automatically available from CIPC |
| Directors Names | Automatically available from CIPC |

4.2. Personnel Records

Personnel records are records we keep about people that work for Private Property.

| Record Type | Availability |
|-----------------------------------|-----------------------------|
| Personal information of employees | Not automatically available |
| Employee contracts of employment | Not automatically available |
| Salaries of Employees | Not automatically available |
| Leave records of Employees | Not automatically available |
| Performance records of Employees | Not automatically available |

4.3. Business Records

Business records consist of information regarding the operation and performance of Private Property.

| Record Type | Availability |
|--|-----------------------------|
| Financial records | Not automatically available |
| Operational records | Not automatically available |
| Information technology intellectual property | Not automatically available |
| Marketing records | Not automatically available |
| Product records | Not automatically available |

4.4. Customer Records

Customer records include information about anyone that makes use of our products and services.

| Record Type | Availability |
|--|-----------------------------|
| Customer details | Not automatically available |
| Customer details of individuals within customers | Not automatically available |
| Communications with customers | Not automatically available |
| Sales records | Not automatically available |
| Product records | Not automatically available |
| Agreements and contracts | Not automatically available |

4.5. Policies

Policy records include information about internal policies used by Private Property to manage the operation of the business and the external policies dealing with external third parties.

| Record Type | Availability |
|----------------------------------|-----------------------------|
| Internal policies and procedures | Not automatically available |
| External policies and procedures | Not automatically available |

4.6. Publications

Publications include information we produce for public or internal consumption.

| Record Type | Availability |
|------------------------------------|-----------------------------|
| Information on our website | Automatically available |
| External newsletters and Circulars | Not automatically available |
| Internal newsletters and Circulars | Not automatically available |

4.7. Information held to comply with other legislation

Private Property may hold information in accordance with the following legislation, among others:

- Arbitration Act 42 of 1965
- Basic Conditions of Employment Act 75 of 1997
- Broad Based Black Economic Empowerment Act 53 of 2003
- Companies Act 61 of 1973
- Companies Act 71 of 2008

- Compensation for Occupational Injuries and Disease Act 130 of 1993
- Competition Act 89 of 1998
- Electronic Communications Act 36 of 2005
- Electronic Communications and Transactions Act 25 of 2002
- Employment Equity Act 55 of 1998
- Financial Intelligence Centre Act 38 of 2001
- Income Tax Act 58 of 1962
- Insolvency Act, Act No. 24 of 1936
- Intellectual Property Laws Amendment Act, No 38 of 1997
- Intellectual Property Laws Amendment Act, No 28 of 2013
- Labour Relations Act 66 of 1995
- Occupational Health and Safety Act 85 of 1993
- Promotion of Access to Information Act, No 2 of 2000
- Protection of Personal Information Act 4 of 2013
- Skills Development Act 97 of 1998
- Skills Development Levies Act 9 of 1999
- Unemployment Insurance Act 63 of 2001
- Unemployment Insurance Contributions Act 4 of 2002
- Value Added Tax Act 89 of 1991

5. Requesting Access to a Record

In order to request access to a record please complete and submit the “Request for Access to Record” form provided by the information regulator at <https://www.justice.gov.za/inforeg/docs2-f.html> as well the prescribed fee (see fee details here: [http://www.sahrc.org.za/home/21/files/PAIA Notice on fees.pdf](http://www.sahrc.org.za/home/21/files/PAIA%20Notice%20on%20fees.pdf)).

Please ensure when making the request that the following is adhered to:

- The prescribed form above is submitted to the information officer using the email or postal address supplied earlier in this document
- Provide sufficient detail for the information officer to identify the requester and the records being requested
- Indicate the format to be used when responding to the request
- Identify the right that is sought to be exercised or protected and provide an explanation as to why the requested record is required to exercise or protected that right
- Provide proof of capacity should you be making the request on behalf of someone else

All requests for access to information will be assessed on a case-by-case basis in accordance with the provisions of the act and a request may be denied. You will be notified in writing within 30 calendar days after receiving your request as to whether the request has been approved or denied. Access will be provided in a form that Private Property deems fit unless you have requested the information in a specific form. A request may be denied in order to protect one of the following:

- the privacy of another person
- commercial information of another company
- confidential information of another person
- the safety of individuals and property
- records regarded as privileged in legal proceedings
- trade secrets of another party
- trade secrets of Private Property
- information that would put Private Property at a commercial disadvantage

6. Processing of Personal Information

6.1. Purpose of Processing

Private Property carefully uses the Personal Information under its care in the following ways:

- To provide services to our customers
- Understanding the needs of our clients
- Marketing of services to prospective customers
- Staff administration
- Keeping of accounts and records
- Complying with tax laws

6.2. Categories of Data Subjects

- Customers, Clients and Leads
- Employees and Directors
- Contractors, vendors or suppliers
- Debtors and creditors

6.3. Categories of Personal Information

- Names, contact details such as phone number and email addresses, physical and postal addresses, and ID numbers
- Demographic details like age and race
- Contract information
- Debt and debtor information

6.4. Cross-border data transfers

Private Property makes use of technical platforms that result in cross-border data flow, all services used are situated in locations that are governed by similar or better privacy laws and where possible data processing agreements are in place as clearly stated in our privacy policy.

6.5. Third-party disclosures

The nature of some of our services means we disclose some personal information collected on our site to third parties, such as:

- estate agents and estate agencies
- delegated operators for estate agencies
- advertisers

7. Availability

The latest version of this manual, which will be updated as needed, it is available on our website at <https://www.privateproperty.co.za>.