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RAWSON RESIDENTIAL FRANCHISES (PTY) LTD

“[RRF]”

REGISTRATION NUMBER

1997/009291/07

PAIA MANUAL 2026

Prepared in terms of section 51 of the Promotion of Access to
Information Act 2 of 2000 (as amended)

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PAIA MANUAL

1. DEFINITIONS

- 1.1. "Agreement" means a written agreement between **RRF** and a Third Party;
- 1.2. "Client" means any prospective, new or existing Client of **RRF** and its subsidiaries;
- 1.3. "Data Subject/s" for the purpose of this document include all living individuals and juristic persons about whom **RRF** holds Personal Information;
- 1.4. "Device" and "Mobile Device" means tablets, mobile or cellular phones, smartphones, handheld computers, PDAs, and laptop or notebook computers, including any accompanying software or hardware;
- 1.5. "Employee/s" means any person who works for or provides services to or on behalf of **RRF** and receives or is entitled to receive any remuneration and any other person who assists in carrying out or conducting the business of **RRF**. This includes partners, directors, all permanent, temporary and part-time Employees as well as consultants, independent consultants, agency workers and contract workers;
- 1.6. "**RRF**" means **Rawson Residential Franchises (Pty) Ltd** and/or any of its subsidiaries and/or any other legal entity, joint venture and/or partnership, wherever situated or operating (and irrespective of structure and/or legal nature/regime) as a Franchisor, with its franchise business, being the selling and granting of franchise licences and rights to juristic persons, who are registered property practitioners in terms of the Property Practitioners Act 22 of 2019, to trade under the Rawson name and brand. **RRF** services or otherwise conducts business under a name which includes **RRF** or any variation thereof (including their subsidiaries, parties that are related or inter-related to them and/or their affiliated companies, to the extent applicable), including in countries which may not have data-protection laws similar to South Africa.
- 1.7. "Image/s", "Photograph" and "video images" refer to any kind of image capture, still or moving, obtained by any photographic device including still image cameras, video cameras, webcams and photographic enabled mobile telephones, and any other type of image capture device not specified here, whether digital or not, using technology existent from time to time. The Processing (including storage) of such images includes film negative, film positive (e.g. transparencies and slides, movies, etc.), photographic paper, digital media, magnetic tape and any other kind of storage method able to be used for the storage of images, still or moving, available now or in the future;
- 1.8. "IO" means the Information Officer appointed as such by **RRF** in terms of section 56 of

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POPIA and who will have the ultimate responsibility to ensure that **RRF** complies with the provisions of POPIA;

- 1.9. "PAIA" means the Promotion of Access to Information Act, 2000;
- 1.10. "Personal Information" means information relating to an identifiable, living, natural person, and (where applicable) an identifiable, existing juristic person in particular by reference to an identification number or to one or more factors specific to physical, physiological, mental, economic, cultural or social identity, including the name, race, gender, marital status, address and identifying number of a person, symbol, e-mail address, physical address, telephone number, location information, online identifier or other particular assignment to the person, recruitment details, financial history and the like. It also includes opinions about individuals as well as facts and also applies to corporate contacts;
- 1.11. "POPIA" means the Protection of Personal Information Act, 2013, including any regulations and/or code of conduct made under that Act;
- 1.12. "Processing" is any activity that involves use of Personal Information. It includes any operation or activity or any set of operations, whether or not by automatic means, concerning Personal Information, including:
 - 1.12.1. the collection, receipt, recording, organisation, collation, storage, updating or modification, retrieval, alteration, consultation or use;
 - 1.12.2. dissemination by means of transmission, distribution or making available in any other form; or
 - 1.12.3. merging, linking, as well as restriction, degradation, erasure or destruction of Personal Information;
- 1.13. **"Record" means any recorded information:**
 - 1.13.1. regardless of form or medium, including any of the following:
 - 1.13.1.1. Writing on any material;
 - 1.13.1.2. information produced, recorded or stored by means of any tape recorder, computer equipment, whether hardware or software or both, or other Device, and any material subsequently derived from information so produced, recorded or stored;
 - 1.13.1.3. label, marking or other writing that identifies or describes anything of which it forms part, or to which it is attached by any means;
 - 1.13.1.4. book, map, plan, graph or drawing;
 - 1.13.1.5. photograph, film, negative, tape or other Device in which one or more

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visual Images are embodied so as to be capable, with or without the aid of some other equipment, of being reproduced;

- 1.13.2. in the possession or under the control of a Responsible Party;
 - 1.13.3. whether or not it was created by a Responsible Party; and
 - 1.13.4. regardless of when it came into existence;
- 1.14. "Responsible party/parties" are the people who or organisations which determine the purposes for which, and the manner in which, any personal information is processed. They have a responsibility to establish practices and policies in line with POPIA. **RRF** is the responsible party of all personal information used in its business.
- 1.15. "Special Personal Information" includes personal information concerning the religious or philosophical beliefs, race or ethnic origin, trade union membership, political persuasion, health, sex life or biometric information of a data subject; or the criminal behaviour of a data subject to the extent that such information relates to the alleged commission by a data subject of any offence; or any proceedings in respect of any offence allegedly committed by a data subject or the disposal of such proceedings;

2. PREAMBLE

- 2.1. PAIA came into operation on 9 March 2001. PAIA seeks, among other things, to give effect to the Constitutional right of access to any information held by the State or by any other person where such information is required for the exercise or protection of any right and gives natural and juristic persons the right of access to Records held by either a private or public body, subject to certain limitations, in order to enable them to exercise or protect their rights. Where a request is made in terms of PAIA to a private body, that private body must disclose the information if the requester is able to show that the Record is required for the exercise or protection of any rights, and provided that no grounds of refusal contained in PAIA are applicable. PAIA sets out the requisite procedural issues attached to information requests.
- 2.2. Section 51 of PAIA obliges private bodies to compile a manual to enable a person to obtain access to information held by such a private body and stipulates the minimum requirements that the manual has to comply with.
- 2.3. This Manual constitutes **RRF's** PAIA manual. This Manual is compiled in accordance with section 51 of PAIA as amended by POPIA, which gives effect to everyone's constitutional right to privacy. POPIA promotes the protection of Personal Information processed by public and private bodies, including certain conditions so as to establish minimum requirements for the Processing of Personal Information. POPIA amends

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certain provisions of PAIA, balancing the need for access to information against the need to ensure the protection of Personal Information.

- 2.4. This PAIA manual also includes information on the submission of objections to the Processing of Personal Information and requests to delete or destroy Personal Information or Records thereof in terms of POPIA.

3. ABOUT RRF

- 3.1. **RRF** operates as a Franchisor within the property sector, whose primary business involves the granting of franchise licences and rights to trade under the Rawson brand to qualifying juristic persons. In addition to the brand identity and copyright, **RRF** provides comprehensive support services to its franchisees, including business management assistance, training, marketing, technological resources, and financial management support. These Rawson franchises facilitate residential and commercial property sales and rentals across South Africa, as well as in Mauritius and Zimbabwe.
- 3.2. This Manual as at the date of compilation, and revision, is applicable to all of **RRF's** head offices in South Africa.

4. KEY CONTACT DETAILS FOR ACCESS TO INFORMATION OF RRF:

4.1 Chief Information Officer

Name of Information Officer: Jeanne-Mare Oosthuizen
Email address of Information Officer: compliance@rawsonproperties.com / jeanne-mare.oosthuizen@rawsonproperties.com
Attention: The Information Officer
Postal address: 222 Main Road, Rondebosch, Cape Town, 7700
Street address: 222 Main Road, Rondebosch, Cape Town, 7700
Phone number: +27 (21) 658 7100

4.2 Deputy Information Officer

Name of the Deputy Information Officer: Charmaine Truter
Email address of Information Officer: compliance@rawsonproperties.com / charmaine.truter@rawsonproperties.com
Attention: The Information Officer
Postal address: 222 Main Road, Rondebosch, Cape Town, 7700
Street address: 222 Main Road, Rondebosch, Cape Town, 7700
Phone number: +27 (21) 658 7100

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4.2 Access to information general contacts

Email: compliance@rawsonproperties.com

4.4 National Head Office Physical and Postal Address:

Postal address: 222 Main Road, Rondebosch, Cape Town, 7700

Street address: 222 Main Road, Rondebosch, Cape Town, 7700

Phone number: +27 (21) 658 7100

Website: www.rawson.co.za

5. INFORMATION REGULATORS GUIDE | HOW TO USE PAIA AND HOW TO OBTAIN ACCESS TO THE GUIDE

5.1. The Regulator has, in terms of section 10(1) of PAIA, as amended, updated and made available the revised Guide on how to use PAIA ("Guide"), in an easily comprehensible form and manner, as may reasonably be required by a person who wishes to exercise any right contemplated in PAIA and POPIA.

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

5.3. The aforesaid Guide contains the description of the PAIA Manual Template:

5.3.1. the objects of PAIA and POPIA;

5.3.2. the postal and street address, phone and fax number and, if available, electronic mail address of

5.3.2.1. the Information Officer of every public body, and

5.3.2.2. every Deputy Information Officer of every public and private body designated in terms of section 17(1) of PAIA1 and section 56 of POPIA ;

5.3.3. the manner and form of a request for

5.3.3.1. access to a record of a public body contemplated in section 113 ; and

5.3.3.2. access to a record of a private body contemplated in section 504 ;

5.3.4. the assistance available from the IO of a public body in terms of PAIA and POPIA;

5.3.5. the assistance available from the Regulator in terms of PAIA and POPIA;

5.3.6. all remedies in law available regarding an act or failure to act in respect of a right or duty conferred or imposed by PAIA and POPIA, including the manner of lodging

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- 5.3.6.1. an internal appeal;
- 5.3.6.2. a complaint to the Regulator; and
- 5.3.6.3. an application with a court against a decision by the information officer of a public body, a decision on internal appeal or decision by the Regulator or a decision of the head of a private body;

5.3.7. the provisions of sections 145 and 516 requiring a public body and private body, respectively, to compile a manual, and how to obtain access to a manual;

5.3.8. the provisions of sections 157 and 528 providing for the voluntary disclosure of categories of records by a public body and private body, respectively;

5.3.9. the notices issued in terms of sections 229 and 5410 regarding fees to be paid in relation to requests for access; and

5.3.10. the regulations made in terms of section 92

5.4. Members of the public can inspect or make copies of the Guide from the offices of the public and private bodies, including the office of the Regulator, during normal working hours.

5.5. The Guide can also be obtained

5.5.1. upon request to the Information Officer;

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

5.6. A copy of the Guide is also available in the following two official languages, for public inspection, at **RRF**'s office during normal office hours, in English and Afrikaans

Any enquiries regarding the Guide should be directed to:

Address:	54 Maxwell Drive, Woodmead, Johannesburg, 2191
Telephone Number:	+27 (0) 10 023 5207
Website:	www.inforegulator.org.za
General Email:	enquiries@inforegulator.org.za
PAIA Complaints:	PAIAComplaints@infoRegulator.org.za
PAIA Compliance:	PAIACompliance@infoRegulator.org.za

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6. OBJECTIVES OF THIS MANUAL

The objectives of this Manual are:

- 6.1. to provide a list of all Records held by **RRF**;
- 6.2. to set out the requirements with regard to who may request information in terms of PAIA as well as the grounds on which a request may be denied;
- 6.3. to define the manner and form in which a request for information must be submitted; and
- 6.4. to comply with the additional requirements imposed by POPIA.

7. ENTRY POINT FOR REQUESTS

- 7.1. PAIA provides that a person may only make a request for information, if the information is required for the exercise or protection of a legitimate right.
- 7.2. Information will therefore not be furnished unless a person provides sufficient particulars to enable **RRF** to identify the right that the requester is seeking to protect as well as an explanation as to why the requested information is required for the exercise or protection of that right. The exercise of an individual's rights is subject to justifiable limitations, including the reasonable protection of privacy, commercial confidentiality and effective, efficient and good governance. PAIA and the request procedure contained in this Manual may not be used for access to a Record for criminal or civil proceedings, nor should information be requested after the commencement of such proceedings.
- 7.3. The IO has been delegated with the task of receiving and co-ordinating all requests for access to Records in terms of PAIA, in order to ensure proper compliance with PAIA and POPIA.
- 7.4. All requests in terms of PAIA and this Manual must be addressed to the IO using the details above.

8. AUTOMATICALLY AVAILABLE INFORMATION

- 8.1. Information that is obtainable via the **RRF** website:- <https://rawson.co.za/> about **RRF** is automatically available and need not be formally requested in terms of this Manual.

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- 8.2. The following categories of Records are automatically available for inspection, purchase or photocopying:

Categories of Records	Available on Website	Available on Telephonic or Email Request
Website & Compliance Terms		
Terms of Use	X	X
Website Privacy Policy	X	X
POPI and PAIA Documents	X	X
Specific Competition & Campaign Terms and Conditions	X	X
Residential Property Listings (Sales & Rentals)	X	
Commercial & Industrial Listings	X	
Property Auction Listings & Information	X	
Franchise Office Locations & Contact Details	X	X
Property Practitioner & Agent Profiles	X	
Head Office & Regional Office Contact Directories	X	X
Franchise Opportunities Information (Residential & Commercial)	X	X
Franchise Application Forms & Onboarding Overview		X
Bond Repayment Calculators & Transfer Cost Calculators	X	
Rawson Finance Service Information & Products	X	X
Seller, Buyer, Landlord & Tenant Guides	X	X
Marketing Brochures & Promotional Flyers	X	X
Press Releases & Official Media Statements	X	X
Rawson Blog Articles & Market News	X	X

9. INFORMATION AVAILABLE IN TERMS OF POPIA

- 9.1. In terms of POPIA, Personal Information must be processed for a specified purpose. The purpose for which Personal Information is processed by **RRF** will depend on the nature of the Personal Information and the particular Data Subject. This purpose is ordinarily disclosed,

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explicitly or implicitly, at the time the Personal Information is collected. Please also refer to **RRF's** Privacy Policies for further information.

9.2. Categories of Personal Information collected by **RRF**: **RRF** may collect all types of Personal Information, including Special Personal Information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person.

9.3. **The purpose of Processing Personal Information:**

9.3.1. In terms of POPIA, Personal Information must be processed for a specified purpose. The purpose for which Personal Information is processed by **RRF** will depend on the nature of the Personal Information and the particular Data Subject. This purpose is ordinarily disclosed, explicitly or implicitly, at the time the Personal Information is collected.

9.3.2. In general, Personal Information is processed for purposes of, inter alia, on-boarding Clients and suppliers, service or product delivery, record management, security, employment, giving effect to professional instructions received and related matters and includes the following:

The Company uses personal information under its care in the following manner:-

- Administration
- Rendering Services under Contractual Agreements
- Staff Administration
- Compliance with Tax Legislation
- Maintenance of Accounting Records
- Making or assisting in making decisions about consumers
- Communicating (including direct marketing) with consumers by:
 - email,
 - SMS,
 - letter,
 - telephone;
 - or in any other way about the Company's services unless consumers indicate otherwise
- Carrying out market research, business and statistical analysis

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- Recovering debt owed to the Company
- Compliance with Regulatory Obligations
- Verifying and Updating Information
- Any other reasonably required purpose relating to the Company's business

9.4 CATEGORIES OF DATA SUBJECTS AND NATURE OF PERSONAL INFORMATION PROCESSED

(Section 51(1)(c)(ii) of the Promotion of Access to Information Act 2 of 2000)

Note: RRF processes personal information relating to the following categories of data subjects for the specific operational, legal, and commercial purposes outlined in this Manual. The nature of the personal information collected depends on the specific relationship and interaction with each data subject.

Categories of Data Subjects	Nature / Categories of Personal Information Processed
Clients, Franchisees & Prospective Clients	● Full names, identity/passport numbers, registration numbers, and tax numbers ● Physical and postal addresses, telephone numbers, and email addresses ● Banking details, financial history, creditworthiness reports, and debt recovery records ● Property practitioner registration details, franchise license rights, and franchise agreements ● Details of contracts, sales, leases, and property transactions entered into with or through RRF and/or its subsidiaries and/or Franchisees. ● Engagement letters, legal files (pleadings, court orders, judgments), and correspondence ● Marketing preferences and communication history

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Categories of Data Subjects	Nature / Categories of Personal Information Processed
Employees, Directors & Candidates	• Full names, identity/passport numbers, demographic details (race, gender, nationality, marital status) • Physical/postal addresses, contact numbers, and personal email addresses • Banking details, tax numbers (PAYE), and salary/payroll records • Educational qualifications, employment history, recruitment details, and CVs • Conditions of employment, employment contracts, and statutory HR records • Internal performance appraisals, training records, SETA submissions, and leave records • Disciplinary records, grievance records, and internal HR correspondence • Criminal check results (if applicable) and health/safety records
Third Parties, Suppliers & Service Providers	• Full registered names, trading names, and company registration numbers • Director/partner full names, identity numbers, and contact details • Business physical/postal addresses, email addresses, and telephone numbers • VAT numbers, tax clearance certificates, and BEE status certificates • Banking and payment details, trade secrets, and service level/vendor agreements • Performance records, financial correspondence, and contractual records
Joint Venture Partners & Subcontractors	• Joint venture agreements, contractor details, and correspondence • Financial records, transaction histories, and shared project/operational documentation • Records provided by or held on behalf of third-party business partners

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Categories of Data Subjects	Nature / Categories of Personal Information Processed
Special Personal Information & Biometrics	• Biometric information (e.g., fingerprints) • Images, photographs, and CCTV video recordings • Health or medical history (where relevant for employee health/safety or insurance records) • Alleged criminal behaviour or background checks carried out for compliance/onboarding

9.5 The recipients or categories of recipients to whom the Personal Information may be supplied:

Depending on the nature of the Personal Information, **RRF** may supply information or Records to the following categories of recipients:

- 9.5.1 statutory oversight bodies, regulators or judicial commissions of enquiry making a request for Personal Information;
- 9.5.2 any court, administrative or judicial forum, arbitration, statutory commission, or ombudsman making a request for Personal Information or discovery in terms of the applicable rules;
- 9.5.3 South African Revenue Services, or another similar authority;
- 9.5.4 anyone making a successful application for access in terms of PAIA or POPIA; and
- 9.5.5 Subject to the provisions of POPIA and other relevant legislation, **RRF** may share information about a Client's creditworthiness with any credit bureau or credit providers industry association or other association for an industry in which **RRF** operates.

9.6 Planned trans-border flows of Personal Information:

- 9.6.1 If a Data Subject visits **RRF** website from a country other than South Africa, the various communications will necessarily result in the transfer of information across international boundaries.
- 9.6.2 **RRF** may need to transfer a Data Subject's information to service providers in countries outside South Africa, in which case it will fully comply with applicable South African data protection legislation comprising POPIA and PAIA.
- 9.6.3 These countries may not have data protection laws which are similar to those of South Africa.

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- 9.7 A general description of information security measures to be implemented by **RRF**: **RRF** takes appropriate information security measures to ensure the confidentiality, integrity and availability of Personal Information in **RRF's** possession. **RRF** takes appropriate technical and organisational measures designed to ensure that Personal Information remains confidential and secure against unauthorised or unlawful Processing and against accidental loss, destruction or damage.

9.8 RECORDS AVAILABLE IN ACCORDANCE WITH OTHER LEGISLATION
(Section 51(1)(b)(iii) of the Promotion of Access to Information Act 2 of 2000)

Note to Requesters:

RRF retains and holds records in accordance with the statutory requirements prescribed by South African legislation as set out below. Please note that the inclusion of a category, record type, or subject matter in the table below does not automatically imply that a request for access will be granted. All requests for access to records held under PAIA, POPIA, or specific statutory provisions will be evaluated on a case-by-case basis in terms of the procedural requirements of PAIA, and access may be refused where valid legal grounds for refusal apply.

Category of Records	Records
Internal Records The Records listed pertain to RRF's own affairs	● Records relating to the incorporation of RRF shareholders and director; ● Financial Records; ● Operational Records; ● Intellectual property; ● Marketing Records; ● Internal correspondence; ● Service Records; ● Statutory Records; ● Internal policies and procedures; ● Minutes of meetings; ● Annual Financial Statements ● Tax Returns ● Accounting Records ● Banking Records

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	● Asset Register ● Rental Agreements ● Invoices ● Insurance Records, including professional indemnity insurance in respect of RRF, group life assurance and disability income protection insurance; ● The RRF provident fund Records and rules; and ● Information technology, including computer software, support and maintenance Agreements.
Employee Records	● Any personal Records provided to RRF by its Employees; ● Any Records a Third Party has provided to RRF about any of their Employees; ● Conditions of employment and other Employee-related contractual and quasi legal records; ● Employment policies and procedures; ● Internal evaluation ● Training manuals; ● Training Records; ● Salary Records; ● Leave Records; ● SETA Records ● Disciplinary Records; and ● Other internal Records and correspondence.
Client-related Records	● Contracts with the Client and between the Client and other persons; ● Details of contracts, sales or leases you enter into with RRF and or its subsidiaries or Franchises; ● Details of transactions carried out with RRF. ● Engagement letters ● Files including pleadings, orders, judgments, and the like ● Financial Records ● Indemnities and guarantees ● Intellectual Property ● Memoranda and letters ● MOIs

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	• Minutes of meetings • Personal Information • Records of correspondence or enquiries from you or anyone acting on your behalf; • Sensitive or special categories of Personal Information, including biometric information, such as Images, fingerprints and voiceprints. • Special Personal Information • Other Records and correspondence
Other Third Party Records <i>Records are kept in respect of other parties, including without limitation joint ventures and consortia to which RRF is a party, contractors and subcontractors, suppliers, service providers, and providers of information regarding general market conditions. In addition, such Third Parties may possess Records which can be said to belong to RRF.</i>	• Employee, Client, or RRF Records which are held by a Third Party as opposed to being held by RRF; and • Records held by RRF pertaining to Third Parties, including financial Records, correspondence, contractual Records, Records provided by the other party, and Records Third Parties have provided about the contractors or suppliers.
Company Secretarial Records	• Documents of Incorporation • Memorandum and Articles of Association • Minutes of Board of Directors' Meetings • Documents relating to the appointment of directors, auditors, secretaries, public officers and other officers • Share Register and other statutory Registers
Income Tax Records	• PAYE Records • Documents issued to employees for income tax purposes • Records of Payments made to SARS on behalf of employees • All other statutory compliances: ○ VAT ○ Skills Development Levies ○ UIF

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	○ Workmen's Compensation
Other Records	● Information relating to RRF; and ● Research information belonging to RRF or carried out on behalf of a Third Party.
IT Department	● Computer Usage Policy ● Disaster Recovery Plans ● Information Security Policies/Standards/Procedures ● Information Technology Systems and User Manuals ● Information Usage Policy Documentation ● Software Licencing ● System Documentation and Renewals

10. CATEGORIES OF RECORDS AVAILABLE UPON REQUEST

- 10.1. **RRF** maintains Records on the categories and subject matters listed below. Please note that Recording a category or subject matter in this Manual does not imply that a request for access to such Records would be granted. All requests for access will be evaluated on a case by case basis in accordance with the provisions of PAIA.
- 10.2. Please note further that many of the Records held by **RRF** are those of Third Parties, such as Clients and Employees, and **RRF** takes the protection of Third Party confidential information very seriously. In particular, where **RRF** acts as professional advisors to Clients, many of the Records held are confidential and others are the property of the Client and not of **RRF**. For further information on the grounds of refusal of access to a Record please see paragraph 12.7 below. Requests for access to these Records will be considered very carefully. Please ensure that requests for such Records are carefully motivated.

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Category of Records	Records
Internal Records The Records listed pertain to own affairs	- Records relating to the incorporation of RRF shareholders and directors; - Financial Records; - Operational Records; - Intellectual property; - Marketing Records; - Internal correspondence; - Service Records; - Statutory Records; - Internal policies and procedures; - Minutes of meetings; - Annual Financial Statements - Tax Returns - Accounting Records - Banking Records - Asset Register - Rental Agreements - Invoices - Insurance Records, including professional indemnity insurance in respect of RRF, group life assurance and disability income protection insurance; - The RRF provident fund Records and rules; and - Information technology, including computer software, support and maintenance Agreements.
Employee Records	- Any personal Records provided to RRF by its Employees; - Any Records a Third Party has provided to RRF about any of their Employees; - Conditions of employment and other Employee-related contractual and quasi legal Records; - Employment policies and procedures; - Internal evaluation - Training manuals;

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	• Training Records; • Salary Records; • Leave Records; • SETA Records • Disciplinary Records; and • Other internal Records and correspondence.
Client-related Records	• Contracts with the Client and between the Client and other persons; • Details of contracts, sales or leases you enter into with RRF, its subsidiaries and Franchises (where applicable); • Details of transactions carried out with RRF. • Engagement letters • Files including pleadings, orders, judgments, and the like • Financial Records • Indemnities and guarantees • Intellectual Property • Memoranda and letters • MOIs • Minutes of meetings • Personal Information • Records of correspondence or enquiries from you or anyone acting on your behalf; • Sensitive or special categories of Personal Information, including biometric information, such as Images, fingerprints and voiceprints. • Special Personal Information • Other Records and correspondence
Other Third Party Records <i>Records are kept in respect of other parties, including without limitation joint ventures and consortia to which RRF is a party, contractors and subcontractors, suppliers, service providers, and providers of information regarding general market conditions. In addition, such Third Parties may possess Records which can be said to belong to RRF.</i>	• Employee, Client, or RRF Records which are held by a Third Party as opposed to being held by RRF; and • Records held by RRF pertaining to Third Parties, including financial records, correspondence, contractual records, records provided by the other party, and records Third Parties have provided about the contractors or suppliers.
Company Secretarial Records	• Documents of Incorporation • Memorandum and Articles of Association • Minutes and Recordings of Board of Directors' Meetings

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	- Documents relating to the appointment of directors, auditors, secretaries, public officers and other officers - Share Register and other statutory Registers
Income Tax Records	- PAYE Records - Documents issued to employees for income tax purposes - Records of Payments made to SARS on behalf of employees - All other statutory compliances: - VAT - Skills Development Levies - UIF - Workmen's Compensation
Other Records	- Information relating to RRF; and - Research information belonging to RRF or carried out on behalf of a Third Party.
IT Department	- Computer Usage Policy - Disaster Recovery Plans - Information Security Policies/Standards/Procedures - Information Technology Systems and User Manuals - Information Usage Policy Documentation - Software Licencing - System Documentation and Renewals

11. REQUEST PROCEDURE

11.1. Access to a Record

11.1.1. If you are entitled to make a request for access to certain information under PAIA, the request procedure outlined below must be utilised.

11.1.1.1. **Completion of the prescribed form:**
Any request for access to a Record in terms of [PAIA must substantially correspond with Form 2 of](#) to Government Notice No. R.757 dated 27

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August 2021 promulgated under the PAIA Regulations and should be specific in terms of the record requested. Please refer to **Form 2**.

A request for access to information which does not comply with the formalities as prescribed by PAIA will be returned to you.

- 11.1.2. POPIA provides that a Data Subject may, upon proof of identity, request **RRF** to confirm, free of charge, all the information it holds about the Data Subject and may request access to such information, including information about the identity of Third Parties who have or have had access to such information.
- 11.1.3. POPIA also provides that where the data subject is required to pay a fee for services provided to him/her, **RRF** must provide the data subject with a written estimate of the payable amount before providing the service and may require that the data subject pays a deposit for all or part of the fee. Grounds for refusal of the data subject's request are set out in PAIA and are discussed below.
- 11.1.4. POPIA provides that a Data Subject may object, at any time, to the Processing of Personal Information by **RRF**, on reasonable grounds relating to his/her particular situation, unless legislation provides for such Processing. The Data Subject must complete the prescribed form (**Form 2** - for access to relevant form, click here ----> [Form 2](#)) and submit it to the Information Officer at the postal or physical address or electronic mail address set out above.
- 11.1.5. A Data Subject may also request **RRF** 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; or destroy or delete a Record of Personal Information about the Data Subject that **RRF** is no longer authorised to retain in terms of POPIA's retention and restriction of Records provisions.
- 11.1.6. A Data Subject that wishes to request a correction or deletion of personal information or the destruction or deletion of a record of personal information must submit a request to the Information Officer at the postal or physical address, facsimile number or electronic mail address set out above.

11.2. Proof of identity:

- 11.2.1. Proof of identity is required to authenticate the Data Subject's identity and the request. The Data Subject will, in addition to this prescribed form, be required to submit acceptable proof of identity such as a certified copy of their identity document or other legal forms of identity.

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11.3. **Payment of the prescribed fees:**

11.3.1. There are two categories of fees which are payable:

11.3.1.1. The request fee: R 140.00 (One Hundred and Forty Rand)

11.3.1.2. The access fee: This is calculated by taking into account reproduction costs, search and preparation costs, as well as postal costs. These fees are set out in **Annexure B**. To access Annexure B, click here ---> [PAIA Fee Structure](#)

11.3.2. Section 54 of PAIA entitles **RRF** 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.

11.3.3. 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.

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11.4. Timelines for consideration of a request for access:

- 11.4.1. Requests will be processed within 30 (thirty) days, unless the request contains considerations that are of such a nature that an extension of the time limit is needed.
- 11.4.2. The IO will inform the requester of the decision, and the fees payable (if applicable) on a form that corresponds substantially with **Form 3** of Government Notice No. R.757 dated 27 August 2021 promulgated under the PAIA Regulations. To gain access to Form 3, click here ----> [Form 3](#)
- 11.4.3. Should an extension be required, you will be notified, together with reasons explaining why the extension is necessary.
- 11.4.4. **Statutory Grounds for Refusal of Access to Records:** RRF may or must refuse a request for access to a record if it falls under any of the statutory grounds set out in Chapter 4 (Sections 63 to 69) of PAIA.
 - 11.4.4.1. **Mandatory Grounds of Refusal** (Access MUST be refused)
 - 11.4.4.1.1. Protection of Third-Party Personal Information (Section 63 of PAIA): If disclosure would involve the unreasonable disclosure of personal information about a natural person, including a deceased individual, unless explicit consent is granted.
 - 11.4.4.1.2. Protection of Third-Party Commercial Information (Section 64 of PAIA): If the record contains trade secrets, or commercial, financial, scientific, or technical information of a third party, where disclosure would cause financial or commercial harm to that third party.
 - 11.4.4.1.3. Protection of Third-Party Confidential Information (Section 65 of PAIA): If disclosure would constitute a breach of a duty of confidence owed to a third party in terms of an agreement.
 - 11.4.4.1.4. Protection of Safety of Individuals and Property (Section 66 of PAIA): If disclosure could reasonably be expected to endanger the life or physical safety of an individual, or prejudice/impair the security of property, building structures, or IT infrastructure.
 - 11.4.4.1.5. Mandatory Protection of Legal Privileged Records (Section 67 of PAIA): If the record is privileged from production in legal proceedings (such as legal

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- 11.4.4.1.6 professional privilege between attorney and client), unless privilege has been waived.
Protection of Research Information of Third Parties (Section 69 of PAIA): If the record contains information about research being carried out by or on behalf of a third party, where disclosure would expose the researcher, **RRF**, or the subject matter to serious disadvantage

11.4.4.2. Discretionary Grounds of Refusal (Access MAY be refused)

- 11.4.4.2.1 Protection of RRF's Commercial Activities and Interests (Section 68(1)(a)–(b) of PAIA):** If the record contains RRF's trade secrets, financial or technical data, or information that would place RRF at a competitive disadvantage in negotiations or commercial competition.
- 11.4.4.2.2 Protection of RRF's Proprietary Computer Programs (Section 68(1)(c) of PAIA):** If the record consists of computer programs, software source code, or digital systems owned by **RRF** or protected by copyright.
- 11.4.4.2.3 Health and Well-being Safeguards (Section 61 of PAIA):** If disclosure of health or medical records is likely to cause serious harm to the requester's physical or mental health or well-being without prior counseling arrangements.
- 11.4.4.2.4 Manifestly Frivolous or Vexatious Requests:** If the request is manifestly frivolous, vexatious, or if processing the request would result in a substantial and unreasonable diversion of **RRF's** operational resources

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- 11.4.4.2. Section 70 of PAIA contains an overriding provision. Disclosure of a Record is compulsory if it would reveal (i) a substantial contravention of, or failure to comply with the law; or (ii) there is an imminent and serious public safety or environmental risk; and (iii) the public interest in the disclosure of the Record in question clearly outweighs the harm contemplated by its disclosure.
- 11.4.4.3. If the request for access to information affects a Third Party, then such Third Party must first be informed within 21 (twenty one) days of receipt of the request. The Third Party would then have a further 21 (twenty one) days to make representations and/or submissions regarding the granting of access to the Record.

11.5. REMEDIES AVAILABLE TO A REQUESTER ON REFUSAL OF ACCESS:

- 11.5.1. If the IO decides to grant access to the particular Record, such access must be granted within 30 (thirty) days of being informed of the decision unless that Record is held by a Third Party, in which case such access must be granted within 60 (sixty) days of the request being made.
- 11.5.2. The decision made by the IO after a request to access information is final. However, in the event that you are not satisfied with the outcome of the request, you are encouraged to engage **RRF's** senior management with a view to resolving the matter.
- 11.5.3. Where a Third Party is affected by the request for access and the IO has decided to grant access to the Record, the Third Party has 30 (thirty) days in which to appeal the decision in a court of competent jurisdiction. If no appeal has been lodged by the Third Party within 30 (thirty) days, access to the Record must be granted.

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12. AVAILABILITY OF THIS MANUAL

- 12.1. This Manual is available for inspection, free of charge, at the offices of **RRF** during normal business hours and on <https://rawson.co.za/>; and
- 12.1.1. to any person upon request and upon the payment of a reasonable prescribed fee; and
- 12.1.2. to the Information Regulator upon request.
- 12.2. 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.
- 12.3. The request forms and fee structure are available on the Information Regulator's website <https://www.justice.gov.za/infoereg/>

13. REQUEST FOR A COPY OF THE GUIDE

- 13.1. Members of the public can inspect or make copies during normal working hours of the Guide from the offices of the public and private bodies (in at least two of the official languages), including the office of the Information Regulator (in each of the official languages). The Guide in each of the official languages can also be obtained: from the Government Gazette **AND/OR** upon request from the Information Regulator, by the Information Officer on a form which corresponds substantially with **Form 1 of Annexure A** to the Regulations. To access the form, click here ---> [Form 1](#)

14. UPDATING OF THE MANUAL

- 14.1. The IO will on a regular basis update this manual.

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ISSUED BY:

Signature:



**Jeanne-Mare Oosthuizen, Information Officer who
warrants that she is duly authorised thereto**

Name:

Jeanne-Mare Oosthuizen

Date:

27 August 2026

Place:

Milnerton