RAWSON OBSERVATORY (Pty) Ltd

trading as **RAWSON PROPERTIES OBSERVATORY (PTY) LTD**

Registration number: 2023/628273/07

PPRA Fidelity Fund Certificate number: 202670843300000

PAIA MANUAL AND PRIVACY NOTICE

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

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Approved by (Head of the private body)	CRISTINA LOPES - FRANCHISEE

1. DEFINITIONS

In this Manual, unless the context indicates otherwise:

1.1 "**the Franchisee**", "**we**", "**us**" and "**our**" means Rawson Observatory (PTY) Ltd registration number 2023/628273/07, trading as RAWSON OBSERVATORY, an independently owned and operated property practitioner business that trades under the Rawson brand in terms of a franchise agreement with Rawson Residential Franchises (Pty) Ltd;

1.2 "**Client**" means any prospective, new or existing seller, buyer, landlord, tenant or other person to whom the Franchisee provides, or intends to provide, property services;

1.3 "**Data Subject**" means the person (natural or, where applicable, juristic) to whom Personal Information relates;

1.4 "**Employee**" means any person who works for, or provides services to or on behalf of, the Franchisee and receives or is entitled to receive remuneration, including directors, members, permanent, temporary and part-time staff, property practitioners (whether employed or independent contractors), candidate property practitioners and interns;

1.5 "**Franchisor**" or "**RRF**" means Rawson Residential Franchises (Pty) Ltd, registration number 1997/009291/07. RRF is a separate legal entity with its own PAIA Manual, available at www.rawson.co.za;

1.6 "**Guide**" means the guide on how to use PAIA and POPIA compiled by the Information Regulator in terms of section 10 of PAIA;

1.7 "**Head of the private body**" means, in relation to the Franchisee, CRISTINA LOPES or the person who is acting as such, or any person duly authorised by that person;

1.9 "**Information Regulator**" or "**Regulator**" means the Information Regulator established in terms of section 39 of POPIA;

1.10 "**PAIA**" means the Promotion of Access to Information Act 2 of 2000, as amended, and its Regulations;

1.11 "**Personal Information**" has the meaning given to it in section 1 of POPIA, and includes information relating to an identifiable, living natural person and, where applicable, an identifiable existing juristic person;

1.12 "**POPIA**" means the Protection of Personal Information Act 4 of 2013 and its Regulations;

1.13 "**PPRA**" means the Property Practitioners Regulatory Authority established in terms of the Property Practitioners Act 22 of 2019;

1.14 "**Processing**" means any operation or activity concerning Personal Information, including collection, receipt, recording, organisation, storage, updating, retrieval, use, dissemination, merging, restriction, erasure or destruction;

1.15 "**Record**" means any recorded information, regardless of form or medium, in the possession or under the control of the Franchisee, whether or not it was created by the Franchisee;

1.16 "**Requester**" means any person, including a public body, making a request for access to a Record of the Franchisee;

1.17 "**Special Personal Information**" means Personal Information concerning a person's religious or philosophical beliefs, race or ethnic origin, trade union membership, political persuasion, health or sex life, biometric information, or criminal behaviour, as described in section 26 of POPIA.

2. INTRODUCTION AND PURPOSE OF THIS MANUAL

2.1 PAIA gives effect to the constitutional right of access to information held by private bodies where that information is required for the exercise or protection of any right. POPIA protects the privacy of Personal Information processed by public and private bodies, and amended PAIA to balance access to information against the protection of Personal Information.

2.2 Section 51 of PAIA requires every private body to compile a manual that explains how to request access to its Records. This document is the Franchisee's PAIA Manual.

2.3 The purpose of this Manual is to:

2.3.1 set out the contact details of the Franchisee's head, Information Officer CRISTINA LOPES

2.3.2 explain where to obtain the Information Regulator's Guide;

2.3.3 describe the Records the Franchisee holds, including Records that are automatically available and Records held in terms of other legislation;

2.3.4 describe how the Franchisee processes Personal Information, as required by POPIA; and

2.3.5 explain the procedure, fees, timelines and grounds for refusal that apply to a request for access, and the remedies available.

2.4 This Manual also serves as the Franchisee's privacy notice in terms of section 18 of POPIA. Section 9 explains what Personal Information the Franchisee processes and why, and section 13 explains how Data Subjects can exercise their rights.

3. ABOUT THE FRANCHISEE

3.1 The Franchisee is a registered property practitioner business that sells residential property, lets rental property on behalf of landlords,] in of Cape Town].

3.2 The Franchisee trades under the [Rawson Properties / Rawson Rentals brand in terms of a franchise agreement with Rawson Residential Franchises (Pty) Ltd ("RRF"). The Franchisee is independently owned and operated, employs its own staff and property practitioners, and is the responsible party for the Personal Information it processes in its business.

3.3 RRF provides the Franchisee with brand, training, support services, tools and systems. Requests for Records held by RRF itself should be made in terms of RRF's own PAIA Manual, available at www.rawson.co.za.

3.4 This Manual applies to the following office(s) of the Franchisee: RAWSON OBSERVATORY

4. CONTACT DETAILS FOR ACCESS TO INFORMATION

4.1 Head of the private body

Name of head	[ANA CRISTINA DE MATOS VIEGAS
Designation	FRANCHISEE
Postal address	[NA
Street address	DEVONSHIRE, 7 MAIN ROAD, GREENPOINT
Telephone number	072 9470122
Fax number	NOT APPLICABLE
Email address	CRISTINA.LOPES@RAWSON.CO.ZA

4.2 Information Officer

Name of Information Officer	CRISTINA LOPES
Designation	FRANCHISEE
Postal address	NA
Street address	DEVONSHIRE, 7 MIAN ROAD GREENPOINT
Telephone number	0729470994
Fax number	NA
Email address	CRISTINA.LOPES@RAWSON.CO.ZA

4.3 Deputy Information Officer(s) NOT APPLICABLE

Name of Deputy Information Officer	[Full name and surname]
Designation	[Office Manager]
Postal address	[Postal address incl. postal code]
Street address	[Physical address incl. postal code]
Telephone number	[Landline and/or mobile]
Fax number	[Fax number, or state: "Not applicable – no fax number"]
Email address	[e.g. compliance@yourdomain.co.za and personal work email]

4.4 General contact details of the Franchisee

Office address	Devonshire 7 Main Road Greenpoint
Telephone number	0729470994
General email address	Cristina.lopes@rawson.co.za
Website	www.rawson.co.za

4.5 All requests in terms of PAIA or POPIA must be addressed to the Information Officer using the details above.

5. THE INFORMATION REGULATOR'S GUIDE ON HOW TO USE PAIA

5.1 The Information Regulator has, in terms of section 10 of PAIA, compiled and made available a Guide on how to use PAIA and POPIA. The Guide is available in each of the official languages and in braille.

5.2 The Guide contains a description of, among other things:

5.2.1 the objects of PAIA and POPIA;

5.2.2 the contact details of the Information Officer of every public body and every Deputy Information Officer of every public and private body;

5.2.3 the manner and form of a request for access to a Record of a public body (section 11) and of a private body (section 50);

5.2.4 the assistance available from the Information Regulator in terms of PAIA and POPIA;

5.2.5 all remedies available in law regarding an act or failure to act in respect of a right or duty under PAIA and POPIA, including how to lodge a complaint with the Regulator or an application with a court;

5.2.6 the requirement that public and private bodies compile a manual, and how to obtain access to a manual;

5.2.7 the voluntary disclosure of categories of Records by public and private bodies (sections 15 and 52);

5.2.8 the notices regarding fees payable for requests for access; and

5.2.9 the regulations made in terms of section 92 of PAIA.

5.3 A copy of the Guide is available for public inspection, free of charge, at the Franchisee's office during normal business hours in **[English and Afrikaans]**

5.4 The Guide can also be obtained from the Information Officer on request, or from the Information Regulator:

Physical address	Woodmead North Office Park, 54 Maxwell Drive, Woodmead, Johannesburg, 2191
Telephone	010 023 5200 / Toll free: 0800 017 160
General enquiries	enquiries@inforegulator.org.za
PAIA complaints	PAIAComplaints@inforegulator.org.za
Website	www.inforegulator.org.za

6. RECORDS AUTOMATICALLY AVAILABLE (SECTION 52 NOTICE)

6.1 The following categories of Records are automatically available without a person having to request access in terms of PAIA. They may be viewed on the website, requested by email or telephone, or inspected at the office, as indicated:

Category of Records	Website	Email / telephone request	Inspection at office
Property listings (sales and rentals) and show-day information	X		
Office contact details location	X	X	X
Property practitioner profiles and contact details	X	X	
This PAIA Manual and the section 52 Notice	X	X	X
Privacy notice / privacy policy	X	X	X
Seller, buyer, landlord and tenant guides and brochures	X	X	X
Marketing brochures, flyers and promotional material	X	X	X
Competition and campaign terms and conditions	X	X	X

6.2 Records that are automatically available may be subject to a copying fee where copies are requested.

7. RECORDS AVAILABLE IN TERMS OF OTHER LEGISLATION

7.1 The Franchisee keeps Records in accordance with the legislation listed below. Inclusion of a Record in this table does not mean that access will be granted; every request is considered in terms of PAIA.

Legislation	Examples of Records held
Property Practitioners Act 22 of 2019 and Regulations	• Fidelity Fund Certificates and PPRA registration records • Trust account records, bank statements and audit reports • Mandates, sale agreements, lease agreements and mandatory disclosure forms • Complaints records, CPD and training records
Financial Intelligence Centre Act 38 of 2001 (FICA)	• Client due diligence (identification and verification) records • Risk Management and Compliance Programme (RMCP) • Transaction records and FIC registration records
Consumer Protection Act 68 of 2008	• Consumer agreements, marketing records, direct-marketing consent and opt-out records
Rental Housing Act 50 of 1999	• Lease agreements, incoming and outgoing inspection reports, deposit and interest records
Alienation of Land Act 68 of 1981	• Deeds of sale and instalment sale agreements
[Sectional Titles Schemes Management Act 8 of 2011 — only if you act as managing agent]	• Scheme management records, levy records, minutes of meetings
Companies Act 71 of 2008 / [Close Corporations Act 69 of 1984]	• Memorandum of Incorporation / founding statement, registers, minutes, annual returns, financial statements

Legislation	Examples of Records held
Income Tax Act 58 of 1962; Tax Administration Act 28 of 2011; Value-Added Tax Act 89 of 1991	• Tax returns, PAYE records (IRP5s), VAT records, SARS correspondence
Basic Conditions of Employment Act 75 of 1997; Labour Relations Act 66 of 1995; Employment Equity Act 55 of 1998	• Employment contracts, payroll, leave, disciplinary and employment equity records
Skills Development Act 97 of 1998; Skills Development Levies Act 9 of 1999	• Training records, SETA submissions, SDL returns
Unemployment Insurance Act 63 of 2001; Unemployment Insurance Contributions Act 4 of 2002	• UIF registration and contribution records
Compensation for Occupational Injuries and Diseases Act 130 of 1993; Occupational Health and Safety Act 85 of 1993	• COIDA registration and returns, incident registers, health and safety records
Broad-Based Black Economic Empowerment Act 53 of 2003	• B-BBEE certificates or sworn affidavits
Electronic Communications and Transactions Act 25 of 2002; Cybercrimes Act 19 of 2020	• Electronic records, IT and information security records, incident records
Protection of Personal Information Act 4 of 2013; Promotion of Access to Information Act 2 of 2000	• Records of Personal Information, consent records, data subject requests, PAIA requests and annual reports
Prescription Act 68 of 1969	• Records kept for the purpose of legal claims

8. SUBJECTS ON WHICH THE FRANCHISEE HOLDS RECORDS

8.1 The Franchisee holds Records on the subjects and in the categories set out below. Many of these Records contain Personal Information or confidential information of third parties (such as Clients and Employees) and may be protected from disclosure under Chapter 4 of Part 3 of PAIA. Requests for such Records must be carefully motivated.

Subject	Categories of Records
Corporate and statutory	Incorporation documents, registers, minutes and resolutions, statutory returns, franchise agreement with RRF
Finance and accounting	Financial statements, accounting records, invoices, commission records, banking records, budgets, asset register, insurance policies
Trust account	Trust account ledgers and bank statements, deposit and interest records, trust account audit reports
Property sales	Mandates, listing and valuation information, marketing material, offers to purchase and sale agreements, mandatory disclosure forms, correspondence with conveyancers and bond originators
Rentals and property management	Rental applications, tenant screening and credit check results, lease agreements, inspection reports, deposit records, rental statements, maintenance records, landlord and tenant correspondence

Subject	Categories of Records
	[
Client compliance (FICA)	Identity documents, proof of address, company and trust documents, beneficial ownership information, risk ratings, transaction records
Human resources and property practitioners	Employment and independent contractor agreements, PPRA registration and Fidelity Fund Certificates, CPD and training records, payroll, leave, performance, disciplinary and recruitment records
Marketing and communications	Client and prospect databases, consent and opt-out records, website and social media content, advertising and campaign records
Information technology and security	IT and information security policies, user access records, software licences, backup and incident records,
Suppliers and service providers	Supplier agreements, operator agreements, invoices, B-BBEE and tax documents
Legal and complaints	Complaints and dispute records, PPRA complaints, litigation files, legal opinions
POPIA and PAIA compliance	IO and DIO appointments, policies, data subject requests, PAIA request register, annual reports, breach register, training records

9. PROCESSING OF PERSONAL INFORMATION

9.1 Purpose of processing

9.1.1 The Franchisee processes Personal Information only for specific, lawful purposes related to its business, which are communicated to the Data Subject when the information is collected. These purposes include:

- marketing, selling and letting property on behalf of Clients, and matching buyers and tenants with suitable properties;
- concluding and administering mandates, sale agreements and lease agreements, and managing rental properties;
- verifying the identity of Clients and complying with FICA, the Property Practitioners Act and other legal obligations;
- assessing rental applications, including credit and reference checks with the applicant's consent;
- managing trust account funds, deposits, commissions and payments;
- recruiting, employing and managing Employees and property practitioners;
- communicating with Clients and prospects, including direct marketing where permitted by POPIA and the Consumer Protection Act;
- keeping our premises, systems and information secure;
- handling complaints, disputes and legal claims; and
- reporting to, and receiving support services from, the Franchisor under the franchise agreement.

9.2 Categories of Data Subjects and Personal Information processed

Categories of Data Subjects	Nature of Personal Information processed
Sellers and landlords	• Names, ID or passport numbers, registration numbers of entities • Contact details and addresses • Property details, title deed information, bond details • Banking details and FICA documents • Marital status and spouse details where required for the transaction
Buyers and tenants (including rental applicants, occupants, sureties and guarantors)	• Names, ID or passport numbers, contact details and addresses • Employment, income and affordability information, bank statements • Credit and reference check results (with consent) • FICA documents • Details of occupants, which may include minor children
Prospective clients and enquirers	• Names, contact details, property requirements and preferences • Communication history and marketing preferences
Employees, property practitioners and job applicants	• Names, ID numbers, contact details, next of kin • Qualifications, employment history, CVs, PPRA registration and FFC details • Banking, tax and payroll details • Race and gender (for employment equity), health information (e.g. sick notes) • Criminal record checks where lawful and relevant
Suppliers, contractors and service providers	• Business names and registration numbers, contact persons • Banking, VAT and B-BBEE details • Agreements and performance records
Visitors to our offices and show houses	• Names and contact details in visitor or show-house registers • [
Body corporates, HOAs and managing agents	• Names and contact details of trustees, directors and managing agents • Levy and scheme information relating to a property

9.2.1 Special Personal Information and information about children are processed only where POPIA allows it, for example where required by law or with consent.

9.3 Recipients or categories of recipients

9.3.1 Depending on the purpose, the Franchisee may share Personal Information with:

- the Franchisor (RRF), for brand, reporting, system and support services under the franchise agreement;
- conveyancing attorneys, bond originators, banks and financial institutions involved in a transaction;
- other property practitioners where a property is jointly marketed or sold;
- property portals and advertising platforms, e.g. [Property24, Private Property], for listing information;
- credit bureaux and tenant-screening service providers, e.g. [TPN], with the applicant's consent;
- body corporates, homeowners' associations, managing agents and municipalities, where needed to manage a property;

- contractors and maintenance service providers appointed to attend to a property;
- our IT, cloud, CRM, accounting and payroll service providers, auditors and insurers, e.g. [

- regulators and authorities such as the PPRA, the Financial Intelligence Centre, SARS, the Department of Employment and Labour and the Information Regulator, where required by law;
- courts, tribunals and law enforcement agencies where required by law; and
- any person who makes a successful request for access in terms of PAIA or POPIA.

9.3.2 Where a third party processes Personal Information on our behalf, we require it to keep that information confidential and secure, as required by sections 20 and 21 of POPIA.

9.4 Planned trans-border flows of Personal Information

9.4.1 The Franchisee uses cloud-based email, document storage and CRM service providers whose servers may be located outside South Africa. Personal Information may therefore be stored or processed in other countries. Any such transfer takes place only in accordance with section 72 of POPIA, for example where the recipient is subject to laws, binding corporate rules or a binding agreement that provide an adequate level of protection, or where the Data Subject has consented or the transfer is necessary to perform a contract.

9.5 Security measures to protect Personal Information

9.5.1 The Franchisee has taken appropriate, reasonable technical and organisational measures to secure the integrity and confidentiality of Personal Information, including:

- password-protected and role-based access to systems and devices, with multi-factor authentication;
- anti-virus and anti-malware software and regular software updates;
- secure, access-controlled cloud storage and regular backups;
- physical security of the office and locked storage for paper files;
- secure destruction of Records once they are no longer required;
- confidentiality undertakings from Employees and written agreements with service providers (operators);
- POPIA awareness training for Employees and property practitioners; and
- a procedure for identifying, recording and reporting security compromises to the Information Regulator and affected Data Subjects.

9.6 Supply of Personal Information

9.6.1 Supplying Personal Information to the Franchisee is voluntary, except where it is required by law (for example, the identification and verification information required by FICA and the Property Practitioners Act) or needed to conclude or perform a mandate, sale or lease. If a Data Subject does not supply the information required, the Franchisee may be unable to conclude the transaction or provide its services.

10. HOW TO REQUEST ACCESS TO A RECORD

10.1 A Requester must be given access to a Record of the Franchisee if the Record is required for the exercise or protection of any right, the Requester complies with the procedural requirements of PAIA, and access is not refused on any ground in PAIA.

10.2 This Manual does not apply to a Record requested for criminal or civil proceedings after those proceedings have started, where the production of the Record is provided for in another law (section 7 of PAIA).

10.3 Completing the prescribed form

10.3.1 A request must be made on **Form 2** of the PAIA Regulations (Request for Access to Record), available from the Information Regulator's website or from the Information Officer, and sent to the Information Officer at the address or email address in section 4.

10.3.2 The Requester must provide enough detail to identify the Record and the Requester, indicate the form of access required, state the right to be exercised or protected and explain why the Record is required for that purpose. If the request is made on behalf of another person, proof of the capacity in which it is made must be attached.

10.3.3 A Requester who cannot read or write, or who has a disability, may make the request orally, and the Information Officer will help to complete the form.

10.4 Fees

10.4.1 A **request fee of R140,00** is payable before the request is processed, unless the Requester is requesting their own Personal Information (a "personal requester").

10.4.2 An **access fee** may be payable once access is granted, covering reproduction, search and preparation (R145,00 per hour after the first hour, up to a maximum of R435,00) and postage, as set out in the Regulator's published fee structure.

10.4.3 Where the search and preparation is expected to take longer than six hours, the Requester may be asked to pay a deposit of one third of the access fee.

10.4.4 The Record will be released once the applicable fees have been paid.

10.5 Timelines

10.5.1 The Information Officer will decide on the request within **30 days** of receiving it and will notify the Requester on **Form 3** of the PAIA Regulations.

10.5.2 This period may be extended once, by no more than 30 days, if the request is for a large number of Records, requires a search through a large number of Records or consultation with others. The Requester will be notified of the extension, the reasons for it, and their right to lodge a complaint with the Regulator.

10.5.3 If the Information Officer does not respond within the required period, the request is regarded as refused.

10.5.4 Where a request relates to a Record containing information of a third party, the Information Officer will take reasonable steps to inform the third party within **21 days**, and the third party may make representations within **21 days** of being informed.

11. GROUNDS FOR REFUSAL OF ACCESS

11.1 The Franchisee may or must refuse access to a Record on the grounds set out in Chapter 4 of Part 3 of PAIA, including:

- **mandatory protection of the privacy of a third party** who is a natural person, including a deceased person (section 63);
- **mandatory protection of commercial information of a third party**, such as trade secrets or financial, commercial or technical information that could cause harm (section 64);
- **mandatory protection of confidential information of a third party** where disclosure would breach a duty of confidence owed in terms of an agreement (section 65);
- **protection of the safety of individuals and property** (section 66);
- **mandatory protection of Records privileged from production in legal proceedings** (section 67);
- **protection of the Franchisee's commercial information**, including trade secrets, financial or commercial information and information that could put the Franchisee at a disadvantage in negotiations or competition (section 68); and
- **protection of research information** of a third party or of the Franchisee (section 69).

11.2 A request may also be refused if it is manifestly frivolous or vexatious, or if the work involved would substantially and unreasonably divert the Franchisee's resources.

11.3 Despite the above, access must be granted where disclosure would reveal evidence of a substantial contravention of the law or an imminent and serious public safety or environmental risk, and the public interest in disclosure clearly outweighs the harm (section 70).

12. REMEDIES AVAILABLE TO A REQUESTER OR THIRD PARTY

12.1 The Franchisee does not have an internal appeal procedure. The decision of the Information Officer is final.

12.2A Requester or third party who is not satisfied with the Information Officer's decision (including a refusal, the fees charged, an extension of time or the form of access) may, within **180 days** of being notified of the decision:

12.2.1 lodge a complaint with the Information Regulator on **Form 5** of the PAIA Regulations; or

12.2.2 apply to a court for appropriate relief.

12.3 Where access is granted despite the objection of a third party, access will only be given once the period for lodging a complaint or court application has expired, unless the third party consents.

13. REQUESTS BY DATA SUBJECTS UNDER POPIA

13.1 **Access to own Personal Information:** A Data Subject may, after providing adequate proof of identity, ask the Franchisee to confirm, free of charge, whether it holds Personal Information about them, and request a description of that information, including the identity of third parties who have had access to it (section 23 of POPIA). Where a fee applies, a written estimate will be provided first and a deposit may be required.

13.2 **Correction or deletion:** A Data Subject may request the correction or deletion of Personal Information that is inaccurate, irrelevant, excessive, out of date, incomplete, misleading or

obtained unlawfully, or the destruction or deletion of a Record the Franchisee is no longer authorised to keep, using **Form 2** of the POPIA Regulations (section 24 of POPIA).

13.3 **Objection to processing:** A Data Subject may object, on reasonable grounds, to the processing of their Personal Information, and may object at any time to processing for direct marketing, using **Form 1** of the POPIA Regulations (section 11(3) of POPIA).

13.4 Requests must be sent to the Information Officer using the details in section 4, together with proof of identity such as a certified copy of an identity document.

13.5A Data Subject who believes their Personal Information has been processed unlawfully may lodge a complaint with the Information Regulator (POPIAComplaints@inforegulator.org.za).

14. AVAILABILITY OF THIS MANUAL

14.1This Manual is available:

14.1.1 on the Franchisee's website at www.rawson.co.za;

14.1.2 for public inspection, free of charge, at the Franchisee's office at [7 DEVONSHIRE, MAIN ROAD GREEN POINT - during normal business hours ([e.g. Monday to Friday, 08:30–17:00]);

14.1.3 to any person on request, on payment of the prescribed copying fee; and

14.1.4 to the Information Regulator on request.

15. UPDATING OF THIS MANUAL

15.1 The Information Officer will review this Manual at least once a year, and update it whenever there is a material change, such as a change in contact details, Information Officer or Deputy Information Officer, services offered or the way Personal Information is processed.

ISSUED BY

Signed at CAPE TOWN on this 28 day of OCTOBER 2026

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Ana Cristina De Matos Viegas

Franchisee/ Information officer who warrants that he/she is duly authorised to sign this Manual on behalf of the Franchisee Rawson Observatory (PTY) Ltd Registration No. 2013/628273/07

ANNEXURE A: PRESCRIBED FORMS

The forms below are available on the Information Regulator's website (www.inforegulator.org.za) or on request from the Information Officer.

Form	Purpose
PAIA Form 1	Request for a copy of the Guide from the Information Officer
PAIA Form 2	Request for access to a Record
PAIA Form 3	Outcome of a request and of fees payable (completed by the Information Officer)
PAIA Form 5	Complaint to the Information Regulator
POPIA Form 1	Objection to the processing of Personal Information
POPIA Form 2	Request for correction or deletion of Personal Information, or destruction or deletion of a Record