

Diversity Urban Property Group Proprietary Limited

Registration number: 1999/022767/07

**Manual in terms of the Promotion of Access to Information Act, 2000 and the
Protection of Personal Information Act, 2013**

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1. Definitions

- 1.1 “Client” refers to any natural or juristic person that received or receives services from the Group;
- 1.2 “Data Subject” has the meaning ascribed thereto in section 1 of POPIA;
- 1.3 “Information Officer” means the Group Chief Operating Officer;
- 1.4 “Manual” means this manual prepared in accordance with section 51 of PAIA and regulation 4(1) (d) of the POPIA Regulations;
- 1.5 “PAIA” means the Promotion of Access to Information Act, 2000;
- 1.6 “Personal Information” has the meaning ascribed thereto in section 1 of POPIA;
- 1.7 “POPIA” means the Protection of Personal Information Act, 2013;
- 1.8 “POPIA Regulations” mean the regulations promulgated in terms of section 112(2) of POPIA;
- 1.9 “Private Body” has the meaning ascribed thereto in sections 1 of both PAIA and POPIA;
- 1.10 “Processing” has the meaning ascribed thereto in section 1 of POPIA;
- 1.11 “Responsible Party” has the meaning ascribed thereto in section 1 of POPIA;
- 1.12 “Record” has the meaning ascribed thereto in section 1 of PAIA and includes Personal Information;
- 1.13 “Requester” has the meaning ascribed thereto in section 1 of PAIA;
- 1.14 “SAHRC” means the South African Human Rights Commission.

2. Purpose of this manual

This Manual:

- 2.1 for the purposes of PAIA, details the procedure to be followed by a Requester and the way a Request for Access will be facilitated; and
- 2.2 for the purposes of POPIA, amongst other things, details the purpose for which Personal Information may be processed; a description of the categories of Data Subjects for whom the Group Processes Personal Information as well as the categories of Personal Information relating to such Data Subjects; and the recipients to whom Personal Information may be supplied.
- 2.3 This manual applies to Divercity Urban Property Group Proprietary Limited and all its subsidiaries and associate companies as listed in Annexure A (“the Group”), unless otherwise stated.

3. PAIA and Section 10 Guide

- 3.1 PAIA grants the requested access to Records of a Private Body, if the Record is required for the exercise or protection of any rights. If a public body lodges a request, the public body must be acting in the public interest.
- 3.2 Requests in terms of PAIA will be made in accordance with the prescribed procedures, at the rates provided. The forms and tariffs are dealt with in sections 18 and 22 of PAIA.
- 3.3 Requesters are referred to the Guide in terms of Section 10 which has been compiled by the South African Human Rights Commission, which will contain information for the purposes of exercising Constitutional Rights. The Guide is available from the SAHRC.
- 3.4 The contact details of the Commission are:
Postal address: Private Bag 2700, Houghton, 2041
Telephone number: 011 877 3600
Fax number: 011 403 0625
Website address: sahrc.org.za

4. Contact details

4.1 Office bearers:

Directors

- GC Holzhausen (Group Information Officer) *
- AO Reyneke
- CG Kleynhans (Chief Executive Officer)
- I Benucci
- SE Hadida
- PGN Jackson
- LH Louw
- MC Mogase
- A Narrendes
- M Van Wyk
- G Quiniou (alternate director to SE Hadida)
- SC Cele
- GR Sibiyi

Prescribed officers

- R Asmal
- JH Reader

*Deputy Information Officer-W Kotze

4.2 Physical addresses:

Building B, Precinct Podium Level
Barlow Park Lifestyle Estate
180 Katherine Street
Sandton
2148

4.3 Telephone number: 087 292 4132

4.4 Website address: www.divercity.co.za

4.5 E-mail address: communication@divercity.co.za

5. Protection of Personal Information

5.1 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.

5.2 The Group needs Personal Information relating to both individual and juristic persons to carry out its business and organisational functions. The way this information is Processed and the purpose for which it is Processed is determined by the Group. The Group is accordingly a Responsible Party for the purposes of POPIA and will ensure that the Personal Information of a Data Subject:

- 5.2.1 is processed lawfully, fairly and transparently. This includes the provision of appropriate information to Data Subjects when their data is collected by the Group, in the form of privacy or data collection notices. the Group must also have a legal basis (for example, consent) to process Personal Information;
- 5.2.2 is processed only for the purposes for which it was collected;
- 5.2.3 will not be processed for a secondary purpose unless that processing is compatible with the original purpose.
- 5.2.4 is adequate, relevant and not excessive for the purposes for which it was collected;
- 5.2.5 is accurate and kept up to date;
- 5.2.6 will not be kept for longer than necessary;
- 5.2.7 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, are subject to an appropriate level of security when stored, used and communicated by the Group, to protect against access and acquisition by unauthorised persons and accidental loss, destruction or damage;
- 5.2.8 is processed in accordance with the rights of Data Subjects, where applicable. Data Subjects have the right to:
 - 5.2.8.1 be notified that their Personal Information is being collected by the Group. The Data Subject also has the right to be notified in the event of a data breach;
 - 5.2.8.2 know whether the Group holds Personal Information about them, and to access that information. Any request for information must be handled in accordance with the provisions of this Manual;
 - 5.2.8.3 request the correction or deletion of inaccurate, irrelevant, excessive, out of date, incomplete, misleading or unlawfully obtained personal information;
 - 5.2.8.4 object to the Group’s use of their Personal Information and request the deletion of such Personal Information (deletion would be subject to the Group’s record keeping requirements);
 - 5.2.8.5 object to the processing of Personal Information for purposes of direct marketing by means of unsolicited electronic communications; and
 - 5.2.8.6 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.
- 5.3 Purpose of the Processing of Personal Information by the Group

Purpose of Processing of Personal Information	Type of Processing
<ol style="list-style-type: none"> 1. For the purposes of recruitment and management of employees. 2. To provide services to the Client in accordance with terms agreed to by the Client; 3. To manage third party and service provider relationships; 4. To manage engagements with statutory and other authorities; 5. To manage engagements with the media and the general public; 	<p>Collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.</p>

<p>6. To undertake activities related to the provision of services and transactions, including:</p> <ul style="list-style-type: none"> a. to verify the identity of Client and third party representatives; b. for risk assessment, information security management, statistical, trend analysis and planning purposes; c. to monitor and record calls and electronic communications with the Client and third party representatives for quality, training, investigation and fraud prevention purposes; d. for crime detection, prevention, investigation and prosecution; e. to enforce or defend the Group's rights; and f. to manage the Group's relationship with its Clients and third parties. <p>7. The purposes related to any authorised disclosure made in terms of agreement, law or regulation;</p> <p>8. Any additional purposes expressly authorised by the Client or relevant third party; and</p> <p>9. Any additional purposes as may be notified to the Client, relevant third parties or Data Subjects in any notice provided by the Group</p>	
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5.4 Categories of Data Subjects and Personal Information relating thereto

Categories of Data Subjects and Personal Information relating thereto	Data Subject
<p>Employees: Name; ID number; business contact details (address/telephone number/email address), bank details; medical aid details; emergency contact details</p>	Natural persons
<p>Service providers: Name; ID/registration number; business contact details (address/telephone number/email address), bank details</p>	Natural persons and juristic persons

<p>Clients: Personal information relating to a Data Subject received by or on behalf of the Group from the Client, Client affiliates and their respective representatives and related parties while providing services to the Client or in connection with a transaction or services.</p> <p>Client personal information may include names, contact details, identification and verification information, nationality and residency information, taxpayer identification numbers, account numbers, voiceprints, PBX recordings, bank account and transactional information (where legally permissible), to the extent that these amount to personal information under POPIA.</p>	<p>Natural persons and juristic persons</p>
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5.5 Possible recipients of Personal Information

The following groups may receive Personal Information from the Group:

- 5.5.1 statutory authorities;
- 5.5.2 clients;
- 5.5.3 professional advisers to the Group;
- 5.5.4 industry bodies;
- 5.5.5 law enforcement agencies;
- 5.5.6 service providers.

5.6 Planned transborder flows of Personal Information

Transborder flow of information will only occur for purposes of cloud storage of such information and then only in compliance with section 72 of the Protection of Personal Information Act, 4 of 2013.

5.7 Security measures to protect Personal Information

- 5.7.1 Physical security measures
 - 5.7.1.1 access controls;
 - 5.7.1.2 employee home and mobile measures;
 - 5.7.1.3 internal security measures;
 - 5.7.1.4 encryption of backup data in motion;
 - 5.7.1.5 encryption of backup data at rest;
- 5.7.2 cyber and information security measures;
 - 5.7.2.1 anti-spam measures;
 - 5.7.2.2 anti-virus measures;
 - 5.7.2.3 firewalls;
 - 5.7.2.4 password control;
 - 5.7.2.5 virtual private networks (VPN);
 - 5.7.2.6 credential vaults.
- 5.7.3 Training and policies in information security.
- 5.7.4 Audits of information security systems and procedures.

- 5.8 Requests for access to Personal Information
- 5.9 A Data Subject may request access to his/her/its Personal Information from the Group at any time, by sending an email to (insert).
- 5.10 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, subject to exceptions contained in POPIA.
- 5.11 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.

6. Applicable legislation

Number	Reference	Act
1	108 of 1996	Constitution of the Republic of South Africa
2	71 of 2008	Companies Act
3	98 of 1978	Copyright Act
4	55 of 1998	Employment Equity Act
5	4 of 2000	Promotion of Equality and Prevention of Unfair Discrimination Act
6	95 of 1967	Income Tax Act
7	66 of 1995	Labour Relations Act
8	89 of 1991	Value Added Tax Act
9	97 of 1998	Skills Development Act
10	9 of 1999	Skills Development Levy Act
11	53 of 2003	Broad based black economic empowerment Act
12	75 of 1997	Basic Conditions of Employment Act
13	85 of 1993	Occupational Health and Safety Act
14	130 of 1993	Compensation for Occupational Injuries and Diseases Act
15	69 of 1984	Close Corporations Act
16	25 of 2002	Electronic Communications and Transactions Act
17	2 of 2000	Promotion of Access of Information Act
18	26 of 2000	Protected Disclosures Act
19	30 of 1996	Unemployment Insurance Act
20	2 of 2013	Protection of Personal Information Act
21	5 of 2000	Preferential Procurement Policy Framework Act
22	12 of 2004	Prevention and combating of corrupt activities Act

23	3 of 2000	Promotion of administrative justice Act
24	89 of 1998	Competition Act
25	38 of 2001	Financial intelligence centre Act
26	68 of 2008	Consumer Protection Act

7. Schedule of Records

The subjects on which the Group holds Records and the categories on each subject in terms of Section 51 are as listed below. Please note that a Requester is not automatically allowed access to these Records and that access to them may be refused in accordance with Sections 62 to 69 of PAIA:

Records	Availability
Public affairs	Freely available on (insert) and www.cipc.co.za
Clients	Request in terms of PAIA
Financial	Request in terms of PAIA
Human Resources	Request in terms of PAIA
Information Technology	Request in terms of PAIA
Corporate	Request in terms of PAIA
Sales and marketing	Limited information available on website Request in terms of PAIA
Operational	Request in terms of PAIA

8. Form of request

- 8.1 To facilitate the processing of your request, kindly use the prescribed form, available on the website of the South African Human Rights Commission at www.sahrc.org.za.
- 8.2 Address your request to the Group Information Officer and send via email to (insert).
- 8.3 Please provide enough details to enable the Group to identify:
 - 8.3.1 the Record/s requested;
 - 8.3.2 the Requester (proof of capacity is required where and agent lodges a request);
 - 8.3.3 the form of access required;
 - 8.3.4 the South African postal- and email address of the Requester;
 - 8.3.5 details of the way the Requester would like to be informed of the outcome of his/her/its request;
 - 8.3.6 the right which the Requester is seeking to exercise or to protect, with an explanation of the reason the Record is required to exercise or protect the right.

Annexure A – Group Entities Covered by this Manual

The following entities form part of the Group and are covered by this Manual:

Entity Name	Registration Number
Diversity Urban Property Group Proprietary Limited	1999/022767/07
20 Siemert Rd Proprietary Limited	2018/572314/07
32 Greene St Proprietary Limited	2017/505533/07
Diversity Commercial Proprietary Limited	2018/197254/07
Diversity Developments 7 Proprietary Limited	2007/023189/07
Diversity Turbine Hall Building Proprietary Limited	2015/106142/07
Ithemba Property Management Proprietary Limited	2008/026791/07
Jewel City Proprietary Limited	2018/103151/07
Pixley House Residential Proprietary Limited	2018/073850/07
Talis House Proprietary Limited	2015/166304/07
Towers Main Proprietary Limited	2017/292341/07
Diversity Developments 6 (RF) Proprietary Limited	2023/773867/07
Diversity CVS Holdco Proprietary Limited	2026/050721/07
Ascension Fund No 3 (RF) (Pty) Ltd	2018/070446/07
Diversity Menlyn Park Development Proprietary Limited	2022/682957/07
<i>Associate and indirect associate companies</i>	
BPR Holdco Proprietary Limited	2018/455668/07
Barlow Park Residential Proprietary Limited ¹	2018/455717/07
Diversity Developments 5 Proprietary Limited	2022/682957/07
23 Lower Long Proprietary Limited ²	2018/455910/07

Circlevest Securitisation Proprietary Limited ³	2008/013121/07
Clidet 950 Proprietary Limited ⁴	2009/006465/07
Clidet 1000 Proprietary Limited ⁴	2009/018240/07
Tortello Investments 143 Proprietary Limited ⁴	2010/000751/07
Standshelf 183 Proprietary Limited ⁴	2014/198103/07

¹ 50% held by BPR Hold Co Proprietary Limited

² 50% held by Divercity Developments 5 Proprietary Limited

³ 11.58% held by Divercity CVS Holdco Proprietary Limited

⁴ Entities are 100% owned by Circlevest Securitisation Proprietary Limited