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PAIA MANUAL

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Table of Contents

1. Background to PAIA and purpose of the PAIA Manual	1
2. Definitions, Acronyms and Abbreviations.....	1
3. Part I – Information required in terms of section 51(1)(a) of PAIA	3
4. Part II – Description of the Guide and the manner in obtaining access to the Guide and the Information Officer (section 51(1)(b))	4
5. Part III – categories of Records of the Attacq Group which are available without a person having to request access in terms of PAIA (section 51(1)(c))	4
6. Part IV – description of Records of the Attacq Group which is available in accordance with any legislation other than PAIA (section 51(1)(d))	5
7. Part V – subjects and categories of Records available only on Request to Access in terms of PAIA (Section 51(1)(e))	6
8. Part VI – detail on how to make a request (section 51(1)(e)).....	8
9. Grounds for refusal of access to Records (chapter 4 of PAIA)	9
10. Remedies available on refusal of a request for information	9
11. Access to Records held by the Attacq Group	10
12. Prescribed Fees	10
13. Protection of Personal Information that is processed by the Attacq Group.....	12
14. Availability of the PAIA Manual	14

Annexures

A. Annexure A – Form 2	15
B. Annexure B – Form 1.....	20
C. Annexure C – Form 3	22
D. Annexure D – The purpose for which the Attacq Group processes	24
E. Annexure E – Categories of Data Subjects and Personal Information relating thereto	25
F. Annexure F – Recipients of Personal Information	27
G. Annexure G - Cross border flows of Personal Information	28
H. Annexure H- Description of security measures to be implemented by the Attacq Group	29
I. Annexure I – Objection to the Processing of Personal Information in terms of Section 11(3) of POPIA by a Data Subject	30
J. Annexure J - Request for correction or deletion of Personal Information or destroying or deletion of record of Personal Information in terms of Section 24(1) of POPIA	31

1. Background to PAIA and purpose of the PAIA Manual

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

The key objectives of PAIA are to:

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

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

Attacq is a real estate investment trust listed on the Johannesburg Stock Exchange and is regarded as a Private Body in terms of PAIA.

This manual was prepared in accordance with section 51 of PAIA, addresses certain requirements of POPIA and constitutes the Attacq Group's PAIA Manual.

The purpose of the PAIA Manual is to promote the right of access to information, to foster a culture of transparency and accountability within the Attacq Group by ensuring that the people of South Africa can effectively exercise their right to information that is required for the exercise or protection of any right, and to establish mechanisms or procedures to give effect to that right in a manner which enables persons to obtain access to records of a Private Body as swiftly, inexpensively and effortlessly as reasonably possible.

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

This PAIA Manual complies with the requirements of the Guide and recognises that the Information Regulator will be responsible to regulate compliance with PAIA and its regulations by both Private and Public Bodies.

2. Definitions, Acronyms and Abbreviations

POLICY NAME	VERSION	DATE ISSUED	PAGE NO.
PAIA Manual	01.4	January 2024	1

Attacq	Attacq Limited, registration no. 1997/000543/06
Attacq Group	Attacq and its direct and indirect subsidiaries
Companies Act	Companies Act, 71 of 2008, as amended from time to time
Data Subject	the person to whom Personal Information relates
EXCO Member	a member of the executive committee at the Attacq Group, and "EXCO Members" shall mean all of them
Guide	the guide referred to in section 10 of PAIA, being the guide originally compiled by the Human Rights Commission in each official language containing such information as may reasonably be required by a person who wishes to exercise any right contemplated in PAIA, which guide is to be updated by the Information Regulator to ensure that it contains such information as may reasonably be required by a person who wishes to exercise any right contemplated in both POPIA and PAIA
Information Officer	the person named at Part II of this PAIA Manual and identified as the information officer for the Attacq Group;
PAIA	the Promotion of Access to Information Act, 2 of 2000, as amended from time to time
Personal Information	<p>Information relating to an identifiable natural person, including, but not limited to –</p> <ul style="list-style-type: none"> • information relating to the race, gender, sex, pregnancy, marital status, national, ethnic or social origin, colour, sexual orientation, age, physical or mental health, well-being, disability, religion, conscience, belief, culture, language and birth of the person; • information relating to the education or the medical, financial, criminal or employment history of the person; • any identifying number, symbol, email address, physical address, telephone number, location information, online identifier or other particular assigned to the person; • the biometric information of the person; • the personal opinions, views or preferences of the person; • correspondence sent by the person that is implicitly or explicitly of a private or confidential nature or further correspondence that would reveal the contents of the original correspondence; • the views or opinions of another individual about the person; and • the name of the person if it appears with other personal information relating to the person or if the disclosure of the name itself would reveal information about the person, <p>but excludes information about an individual who has been dead for more than 20 years</p>
POPIA	the Protection of Personal Information Act, 4 of 2013, as amended from time to time

POLICY NAME	VERSION	DATE ISSUED	PAGE NO.
PAIA Manual	01.4	January 2024	2

POPIA Regulations	means the regulations promulgated in terms of section 112(2) of POPIA
Prescribed Officer	bears the meaning set out in the Companies Act
Private Body	any former or existing juristic person
Processing	means any operation or activity or any set of operations, whether or not by automatic means, concerning Personal Information, including – <ul style="list-style-type: none"> a) the collection, receipt, recording, organisation, collation, storage, updating or modification, retrieval, alteration, consultation or use; b) dissemination by means of transmission, distribution or making available in any other form; or c) merging, linking, as well as restriction, degradation, erasure or destruction of information
Public Body	(a) any department of state or administration in the national or provincial sphere of government or any municipality in the local sphere of government; or (b) any other functionary or institution when – <ul style="list-style-type: none"> a. exercising a power or performing a duty in terms of the Constitution or a provincial constitution; or b. exercising a public power or performing a public function in terms of any legislation
Record	any recorded information – <ul style="list-style-type: none"> (a) regardless of form or medium; (b) in the possession or under the control of that Public or Private Body, respectively; and (c) whether or not it was created by that Public or Private Body respectively
Responsible Party	means a Public or Private Body or any other person which, alone or in conjunction with others, determines the purpose of and means for processing Personal Information
Requester	in relation to a Private Body, means (i) any person, including, but not limited to, a Public Body or an official thereof, making a request for access to a Record of that Private Body; or (ii) a person acting on behalf of the person contemplated in (i)

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

Name of Private Body	Attacq Group
Head of Private Body	Jackie van Niekerk (Chief Executive Officer)
Postal Address	Postnet Suite 016, Private Bag X81, Halfway House, Gauteng, 1685
Physical Address	Nexus 1 Ground Floor, 44 Magwa Crescent, Waterfall City, Waterfall, 2090, Gauteng Province, South Africa
Telephone Number	+27 10 549 1050
Email address	popia@attacq.co.za

POLICY NAME	VERSION	DATE ISSUED	PAGE NO.
PAIA Manual	01.4	January 2024	3

4. Part II – Description of the Guide and the manner in obtaining access to the Guide and the Information Officer (section 51(1)(b))

The Guide contains information required by any person wishing to exercise any right set out in PAIA and POPIA.

The Guide is currently available in all of the official languages of South Africa and is available for inspection by the public at the offices of the Information Regulator at JD House, 27 Stiemens Street, Braamfontein, email: PAIACompliance@inforegulator.org.za OR on its website – www.inforegulator.org.za. Any request for public inspection of the Guide at the office of the Information Regulator or a request for a copy of the Guide from the Information Regulator must substantially correspond with Form 1 of Annexure A to Government Notice No. R.757 dated 27 August 2021 promulgated under the PAIA Regulations (attached hereto as **Annexure B** for ease of convenience).

PAIA prescribes the appointment of an Information Officer for Private Bodies where such Information Officer is responsible to, amongst other things, assess requests for access to information. The Head of a Private Body fulfils such a function in terms of section 51 of PAIA. The Attacq Group has opted to appoint an Information Officer to assess such a request for access to information as well as to oversee its required functions in terms of PAIA.

In terms of Regulation 3 of the PAIA Regulations, 2021, the Information Officer must have a copy of the Guide at the registered head office for public inspection during normal office hours. The Information Officer must make available, upon written request of any person, copies of the Guide as requested. The Requester must complete the prescribed Form 1 (available on the website of the Information Regulator -www.inforegulator.org.za and attached hereto as **Annexure B** for ease of convenience).

The Information Officer appointed in terms of PAIA also refers to the Information Officer as referred to in POPIA. The Information Officer oversees the functions and responsibilities as required for in terms of both PAIA and in terms of section 55 of POPIA. The Information Officer may appoint, where it is deemed necessary, Deputy Information Officers, as allowed in terms of section 17 of PAIA as well as section 56 of POPIA – this is in order to ensure that the Attacq Group is as accessible as reasonably possible for Requesters of its Records and to ensure fulfilment of its obligations and responsibilities as prescribed in terms of section 55 of POPIA.

The contact details of the Information Officer are:

Information Officer	Chief Executive Officer – Jackie van Niekerk
Physical Address	Nexus 1 Ground Floor, 44 Magwa Crescent, Waterfall City, Waterfall, 2090, Gauteng Province, South Africa
Telephone Number	+27 10 549 1050
Email address	popia@attacq.co.za

5. Part III – categories of Records of the Attacq Group which are available without a person having to request access in terms of PAIA (section 51(1)(c))

Any Records of a public nature, typically those that are required to be made available in terms of the Companies Act, as well as the JSE Listing Requirements are made available for inspection by interested parties. Such public information includes all information made available on Attacq's website (www.attacq.co.za), which includes, without limitation, Attacq's integrated and sustainability report, all of its SENS announcements and Attacq's audited annual financial statements.

POLICY NAME	VERSION	DATE ISSUED	PAGE NO.
PAIA Manual	01.4	January 2024	4

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

6. Part IV – description of Records of the Attacq Group which is available in accordance with any legislation other than PAIA (section 51(1)(d))

The Attacq Group also retains Records in terms of certain legislation that applies to its business and operations. Unless disclosure is prohibited in terms of applicable legislation, regulations, contractual agreement or otherwise, Records that are required to be made available in terms of applicable legislation shall be made available for inspection by interested parties in terms of the requirements and conditions of PAIA, the below-mentioned legislation and applicable internal policies and procedures, should such interested parties be entitled to such information. A request to access to such Records must be done in accordance with the requirements of PAIA.

- Broad Based Black Economic Empowerment Act, No 53 of 2003 and Codes of Good Practice
- Estate Agency Affairs Act, NO 112 of 1976
- NERSA Regulation for SSREG
- Occupational Health and Safety Act, No 85 of 1993
- POPIA
- National Heritage Resources Act, No 25 of 1999
- Non-Profit Organisations Act, No 71 of 1997
- Preferential Procurement Policy Framework Act, No 5 of 2000
- Sectional Titles Act, No 95 of 2016
- Sectional Titles Schemes Management Act, No 8 of 2011
- Spatial Planning and Land Use Management Act, No 16 of 2013
- Tobacco Products Control Amendment Act, No 23 of 2007
- Community Schemes Ombud Service Act, No 9 of 2011
- Trademarks Act, No 194 of 1993
- National Environmental Management Act, No 107 of 1998
- Environment Conservation Act, No 73 of 1989
- Occupational Health and Safety Act, No 85 of 1993
- Subdivision of Agricultural Land Act, No 70 of 1970
- Alienation of Land Act, No 68 of 1981
- Formalities in respect of Lease of Land Act, No 18 of 1969
- National Building Regulations and Building Standards Act, No 103 of 1977
- Prevention from Illegal Eviction from and unlawful occupation of Land Act, No 19 of 1998
- Tax Administration Act, No 28 of 2011
- Protected Disclosures Act, No 26 of 2000
- Companies Act, No 71 of 2008
- Financial Markets Act, No 19 of 2012
- JSE Listing Requirements
- Deeds Registries Act, No 47 of 1937
- Prevention and Combating of Corrupt Activities Act, No 12 of 2004
- Prevention of Organised Crime Act, No 121 of 1998
- Competition Act, No 89 of 1998
- Competition Amendment Act, No 32 of 2005
- Institution of Legal Proceedings against certain Organs of State Act, No 40 of 2002
- Consumer Protection Act, No 68 of 2008
- Prescription Act, No 68 of 1969
- Basic Conditions of Employment Act, No 75 of 1997
- Employment Equity Act, No 55 of 1998
- Employment Equity Amendment Act, No 47 of 2013
- Labour Relations Act, No 66 of 1995
- Labour Relations Amendment Act, No 6 of 2014
- Promotion of Equality and Prevention of Unfair Discrimination Act, No 4 of 2000
- Skills Development Act, No 97 of 1998
- Unemployment Insurance Act, No 63 of 2001

POLICY NAME	VERSION	DATE ISSUED	PAGE NO.
PAIA Manual	01.4	January 2024	5

- Unemployment Insurance Contributions Act, No 4 of 2002
- Compensation for Occupational Injuries and Diseases Act, No 130 of 1993
- Exchange Control Regulations
- Value Added Tax Act, No 89 of 1991.

* Although we have used our best endeavours to provide a list of applicable legislation, it is possible that this list may be incomplete. Whenever it comes to our attention that existing or new legislation allows a Requester access on a basis other than as set out in PAIA, we will update the list accordingly. If a Requester believes that a right of access to a record exists in terms of other legislation listed above or any other legislation, the Requester is required to indicate what legislative right the request is based on, to allow the Information Officer the opportunity to consider the request in light thereof.

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

This Part V serves as a reference to the categories of information that the Attacq Group holds. The information is classified and grouped according to records relating to the following subjects and categories as set out in the schedule below.

Please note that the accessibility of the records may be subject to the grounds of refusal as set out in this PAIA Manual. In addition, records deemed confidential on the part of a third party will necessitate permission from the third party concerned, in addition to usual requirements, before the Attacq Group will consider access.

Corporate Governance Records	<ul style="list-style-type: none"> • Memorandum of Incorporation, as amended (if applicable) and any Rules • Records in respect of the directors as required in terms of section 24(3) of the Companies Act • Reports to annual meetings, and annual financial statements • Minutes of meetings of the board of directors and shareholders • Register of directors • Statutory registers (including the securities register) • Registered office of a company • Company annual returns • Records relating to the appointment of auditors, directors, prescribed officers, public officer and secretary • Codes of Conduct • Policies
Accounting Records	<ul style="list-style-type: none"> • Financial year end • Accounting records, including – <ul style="list-style-type: none"> ○ Record of assets and liabilities ○ Record of any loan by an Attacq Group company to a shareholder, director, prescribed officer or employee, or to a person related to any of them ○ Record of any liabilities and obligations of the company (eg guarantee, suretyship, loan from a shareholder etc) ○ Record of any property held by the Attacq Group ○ Record of revenue and expenditure • Annual financial statements • Integrated report • Sustainability report • Annual and interim results booklets, including commentary (SENS announcements relating to results) • Banking records, bank statements, electronic banking records • Asset register • Rental agreements and related rental invoices • Service Level Agreements and related supplier invoices
Tax Records	<ul style="list-style-type: none"> • PAYE records (EMP 201) • Documents issued to employees for income tax purposes • Records of payments made to the South African Revenue Services on behalf of employees • All other statutory compliances: <ul style="list-style-type: none"> ○ Value Added Tax returns (VAT 201) ○ Tax returns (IT 14) ○ Securities Transfer Tax

POLICY NAME	VERSION	DATE ISSUED	PAGE NO.
PAIA Manual	01.4	January 2024	6

	<ul style="list-style-type: none"> ○ Skills Development Levies ○ Unemployment Insurance Fund ○ Workmen's Compensation ● In general, all records, books of account or documents that ensures compliance with the requirements of the Tax Administration Act, 28 of 2011, are specifically required under such Act or by the Tax Commissioner by public notice, or enable the South African Revenue Services to be satisfied that such requirements have been observed
Human Capital Records	<ul style="list-style-type: none"> ● Employment contracts ● PAYE records and returns ● Performance management records ● Career development records ● UIF returns ● Disciplinary records ● Disciplinary code ● Payroll records ● Pension fund records ● Leave records ● Training records ● Training manuals ● SETA records ● Employment Equity Plan
B-BBEE Records	<ul style="list-style-type: none"> ● B-BBEE annual compliance report ● B-BBEE certificate
Training and education Records	<ul style="list-style-type: none"> ● Training material ● Training records and statistics ● Learnership programmes ● Training agreements
Health and safety, and sustainability Records	<ul style="list-style-type: none"> ● Health and safety records ● Occupational Health and Safety appointments ● Occupation certificates of all buildings ● Fire clearance certificates of all buildings ● Specialist studies – biodiversity, climate change ● Sustainability policy and operational plan ● Project feasibilities ● ESG reporting records – MSCI, FTSE Russel ● Green Leases ● Specialist strategies – smart city ● Owner Project Requirements – new buildings, existing buildings, health and wellness, indoor air quality ● Water Use Licenses and audits ● Environmental authorisations ● Environmental plans – waste management, stormwater management ● Environmental audit records
Procurement Records	<ul style="list-style-type: none"> ● Standard terms and conditions for supply of services and products ● Contractor, client and supplier agreements ● Lists of suppliers, products, services and distribution ● Policies and procedures ● Proposal and tender documents ● Project plans
Operations Records	<ul style="list-style-type: none"> ● Access control records ● Service level agreements ● Travel documentation ● General correspondence ● Patents and trade mark documents ● Insurance documentation ● Procurement agreements and documentation
Marketing and Communication Records	<ul style="list-style-type: none"> ● Advertising and promotional material ● Proposal documents ● Communication strategies ● Brand information management ● New business development ● Marketing strategies
Risk management	<ul style="list-style-type: none"> ● Audit reports ● Risk management frameworks ● Risk management plans

POLICY NAME	VERSION	DATE ISSUED	PAGE NO.
PAIA Manual	01.4	January 2024	7

† and audit Records	
Information Management † and Technology records	<ul style="list-style-type: none"> • Computer/mobile device usage policy documentation • Disaster recovery plans • Hardware asset registers • Information security policies/standards/procedures • Information technology systems and user manuals • Information usage policy documentation • Project implementation plans • Software licensing • System documentation and manuals
Corporate Social Responsibility (CSR) records	<ul style="list-style-type: none"> • CSR schedule of projects/record of organisations that receive funding • Reports, books, publication and general information related to CSR spend • Records and contracts of agreement with funded organisations

8. Part VI – detail on how to make a request (section 51(1)(e))

The Requester must comply with all the procedural requirements of PAIA relating to the request for access to a Record.

The Requester must complete the prescribed Form 2 (available on the website of the Information Regulator -www.inforegulator.org.za and attached hereto as **Annexure A** for ease of convenience) and submit this form together with a request fee to the Information Officer (see contact details at section 4 above).

In the prescribed form –

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

Attacq will inform the Requester within 30 (thirty) days after receipt of the request of its decision whether or not to grant the request. The Information Officer will inform the requester of the decision, and the fees payable (if applicable) on a form that corresponds substantially with Form 3 of Annexure A to Government Notice No. R.757 dated 27 August 2021 promulgated under the PAIA Regulations ((available on the website of the Information Regulator -www.inforegulator.org.za and attached hereto as **Annexure C** for ease of convenience).

The 30 (thirty) day period may be extended with a further period of not more than 30 (thirty) days if the request is for a large number of Records or requires the Attacq Group to search through a large volume of Records or the Records are not kept at the offices of Attacq.

If the request for access is granted, the notice will state the access fee (if any) to be paid upon access, the form in which the access will be given and that the Requester may lodge an application with a Court against the access fee to be paid or the form of access granted, and the procedure for lodging the Court application.

If the request for access is refused, the notice will state adequate reasons for the refusal, including the provisions of PAIA relied on and will state that the Requester may lodge an application with a Court

POLICY NAME	VERSION	DATE ISSUED	PAGE NO.
PAIA Manual	01.4	January 2024	8

against the refusal for the request, and the procedure (including the period) for lodging the application.

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

Subject to sections 7 and 70 of PAIA, the main grounds on which the Attacq Group may refuse a request for information as contemplated in PAIA relate to the following:

- 9.1 mandatory protection of the privacy of a third party who is a natural person, which would involve the unreasonable disclosure of Personal Information of that natural person;
- 9.2 mandatory protection of commercial information of a third party, if the Record contains –
 - 9.2.1 trade secrets of that third party;
 - 9.2.2 financial, commercial, scientific or technical information which disclosure could likely cause harm to the financial or commercial interests of that third party;
 - 9.2.3 information disclosed in confidence by a third party to the Attacq Group, if the disclosure of which could reasonably be expected –
 - 9.2.3.1 to put that third party at a disadvantage in contractual or other negotiations; or
 - 9.2.3.2 to prejudice that third party in commercial competition;
 - 9.2.4 mandatory protection of confidential information if the disclosure would constitute a breach of a duty or confidence owed to a third party in terms of any agreement;
 - 9.2.5 mandatory protection of the safety of individuals and the protection of safety of property;
 - 9.2.6 mandatory protection of Records which would be regarded as privileged in legal proceedings;
 - 9.2.7 the protection of the commercial activities of the Attacq Group, which include, but not limited to –
 - 9.2.7.1 trade secrets of the Attacq Group;
 - 9.2.7.2 financial, commercial, scientific or technical information which disclosure could likely cause harm to the financial or commercial interests of the Attacq Group;
 - 9.2.7.3 information which, if disclosed, could put the Attacq Group at a disadvantage in negotiations or commercial competition;
 - 9.2.7.4 a computer program which is owned by the Attacq Group and which is protected by copyright except insofar as the Attacq Group is required to give access to a Record to which access is granted in terms of PAIA; and
 - 9.2.7.5 research information of the Attacq Group or a third party on behalf of the Attacq Group, if the disclosure would expose the third party, the Attacq Group, and/or the researcher of the subject matter of the research to serious disadvantage.

10. Remedies available on refusal of a request for information

POLICY NAME	VERSION	DATE ISSUED	PAGE NO.
PAIA Manual	01.4	January 2024	9

Any refusal of a request for information is finally decided by the Information Officer. There is no internal appeal procedure that may be followed after a request to access information has been refused.

If a request for information is denied, the Requester is entitled to apply to a Court with the appropriate jurisdiction for relief.

11. Access to Records held by the Attacq Group

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

There are two types of Requesters:

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

12. Prescribed Fees

PAIA provides for two types of fees, namely:

- a request fee, which is a form of administration fee to be paid by all Requesters except personal Requesters, before the request is considered and is not refundable; and
- an access fee, which is paid by all Requesters in the event that a request for access is granted. This fee is inclusive of costs involved by the Attacq Group in obtaining and preparing a Record for delivery to the Requester.

When the request is received by the Information Officer, such officer shall by notice require the Requester (other than a personal Requester) to pay the prescribed request fee before further Processing of the request (section 54(1)).

The Information Officer shall withhold a Record until the Requester has paid the requisite fees.

A Requester whose request for access to a Record has been granted, must pay an access fee that is calculated to include, where applicable, the request fee, the process fee for reproduction and for search and preparation, and for any time reasonably required in excess of the prescribed hours to search for and prepare the record for disclosure including making arrangements to make it available in the request form.

POLICY NAME	VERSION	DATE ISSUED	PAGE NO.
PAIA Manual	01.4	January 2024	10

If a deposit has been paid in respect of a request for access, which is refused, then the Information Officer must repay the deposit to the Requester.

The prescribed fee for request to a Private Body is available on the website of the Information Regulator –www.inforegulator.org.za.

Where the Attacq Group has voluntarily provided a list of categories of Records that will automatically be made available to any person requesting access thereto, the only charge that may be levied for obtaining such Records, will be a fee for reproduction of the relevant Record. The applicable reproduction fees that will be payable are:

Reproduction of information fees	Fees to be charged
Information in an A-4 size page photocopy or part thereof	R2
A printed copy of an A4-size page or part thereof	R2
A copy in computer-readable format, for example: compact disc	R60
A transcription of visual images, in an A4-size page or part thereof	Service to be outsourced. Will depend on quotation from Service provider.
A copy of visual images	Service to be outsourced. Will depend on quotation from Service provider.
A transcription of an audio record for an A4-size page or part thereof	R24
A copy of an audio record	R40

Where a Requester submits a request for access to information held by a Private Body in respect of a person other than the Requester himself/ herself, a request fee of R140 is payable up-front before the Private Body will further process the request.

An access fee is payable in all instances where a request for access to information is granted, except in those instances where payment of an access fee is specially excluded in terms of PAIA or an exclusion is determined by the Minister in terms of section 54(8).

The applicable access fees which will be payable are:

Access of information fees	Fees to be charged
Information in an A-4 size page photocopy or part thereof	R2.00
A printed copy of an A4-size page or part thereof	R2.00
A copy in computer-readable form on flash drive (provided by requestor)	R40
A copy in computer-readable form on a CD (provided by requestor)	R40
A copy in computer-readable form on a CD (provided by Attacq)	R60
A transcription of visual images, in an A4-size page or part thereof	Service to be outsourced. Will depend on quotation from Service provider.
A copy of visual images	Service to be outsourced. Will depend on quotation from Service provider.
A transcription of an audio record for an A4-size page or part thereof	R24
A copy of an audio record on flash drive (provided by requestor) (*per hour or part of an hour reasonably required for such search)	R40
A copy of an audio record on a CD (provided by requestor)	R60
A copy of an audio record on on a CD (provided by Attcq)	R60
To search for and prepare the record for disclosure for each hour or part of an hour, excluding the first hour, reasonably required for such search and preparation.	R145

POLICY NAME	VERSION	DATE ISSUED	PAGE NO.
PAIA Manual	01.4	January 2024	11

To not exceed a total cost of	R435
Where a copy of a record needs to be posted the actual postal fee is payable	Actual expense, if any

Where the Public Body receives a request for access to information in respect of a person other than the Requester himself/herself and the Information Officer upon receipt of the request is of the opinion that the preparation of the required Record will take more than six hours to prepare, a deposit is payable by the Requester. The amount of the deposit is equal to one third of the amount of the applicable access fee.

13. Protection of Personal Information that is processed by the Attacq Group

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.

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

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

13.1 Purpose of the Processing of Personal Information by the Attacq Group

POLICY NAME	VERSION	DATE ISSUED	PAGE NO.
PAIA Manual	01.4	January 2024	12

As abovementioned, Personal Information held by Attacq can only be processed for a specific purpose. The purpose for which the Attacq Group processes or will process Personal Information is set out in **Annexure D**.

13.2 Categories of Data Subjects and Personal Information relating thereto

As stipulated by section 1 of POPIA, a Data Subject may either be a natural or a juristic person. **Annexure E** sets out the various categories of Data Subjects that the Attacq Group processes Personal Information on and the types of Personal Information relating thereto.

13.3 Recipients of Personal Information

Annexure F outlines the recipients to whom the Attacq Group may provide a Data Subject's Personal Information to.

13.4 Cross-border flows of Personal Information

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

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

Annexure G sets out the planned cross-border transfers of Personal Information and the condition from above that applies thereto.

13.5 Description of information security measures to be implemented by the Attacq Group

Annexure H sets out the types of security measures to be implemented by the Attacq Group in order to ensure that Personal Information is respected and protected. A preliminary assessment of the suitability of the information security measures implemented or to be implemented by the Attacq Group may be conducted in order to ensure that the Personal Information that is processed by the Attacq Group is safeguarded and processed in accordance with the Conditions for Lawful Processing.

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

Section 11 (3) of POPIA and regulation 2 of the POPIA Regulations provides that a Data Subject may, at any time object to the Processing of his/her/its Personal Information in the prescribed form attached to this manual as **Annexure I** subject to exceptions contained in POPIA.

13.7 Request for correction or deletion of Personal Information

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

POLICY NAME	VERSION	DATE ISSUED	PAGE NO.
PAIA Manual	01.4	January 2024	13

14. Availability of the PAIA Manual

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

This PAIA Manual is also available at <https://www.atacq.co.za>

This PAIA Manual is further available at the offices of the Company situated at **Nexus 1 Ground Floor, 44 Magwa Crescent, Waterfall City, Waterfall, 2090, Gauteng Province, South Africa**, for inspection during normal business hours.

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

POLICY NAME	VERSION	DATE ISSUED	PAGE NO.
PAIA Manual	01.4	January 2024	14

Annexure A

FORM 2

REQUEST FOR ACCESS TO RECORD OF PRIVATE BODY

[Regulation 7]

Note:

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

TO: The information officer

(Address)

E-mail address: _____

Fax number: _____

Mark with an "X"

Request is made in my own name

Request is made on behalf of another person.

PERSONAL INFORMATION

Full names:	
Identity number:	
Capacity in which request is made (when made on behalf of another person):	
Postal Address:	
Street Address:	
E-mail Address	

POLICY NAME	VERSION	DATE ISSUED	PAGE NO.
PAIA Manual	01.4	January 2024	15

Contact numbers: Tel. (B):	
Cellular:	
Facsimile:	
Full names of person on whose behalf request is made (if applicable):	
Identity number:	
Postal Address:	
Street Address:	
E-mail Address:	
Contact numbers: Tel. (B):	
Cellular:	
Facsimile	
PARTICULARS OF RECORD REQUESTED	
Provide full particulars of the record to which access is requested, including the reference number if that is known to you, to enable the record to be located. (If the provided space is inadequate, please continue on a separate page and attach it to this form. All additional pages must be signed.)	
Description of record or relevant part of the record:	
Reference number, if available:	
Any further particulars of record:	

TYPE OF RECORD (Mark the applicable box with an "X")	
Record is in written or printed form	
Record comprises virtual images (this includes photographs, slides, video recordings, computer generated images, sketches, etc)	
Record consists of recorded words or information which can be reproduced in sound	
Record is held on a computer or in an electronic, or machine-readable form	
FORM OF ACCESS (Mark the applicable box with an "X")	
Printed copy of record (including copies of any virtual images, transcriptions and information held on computer or in an electronic or machine-readable form)	

POLICY NAME	VERSION	DATE ISSUED	PAGE NO.
PAIA Manual	01.4	January 2024	16

Written or printed transcription or virtual images <i>(this includes photographs, slides, video recordings, computer-generated images, sketches, etc)</i>	
Transcription of soundtrack <i>(written or printed document)</i>	
Copy of record on flash drive <i>(including virtual images and soundtracks)</i>	
Copy of record on compact disc drive <i>(including virtual images and soundtracks)</i>	
Copy of record saved on cloud storage server	

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

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

POLICY NAME	VERSION	DATE ISSUED	PAGE NO.
PAIA Manual	01.4	January 2024	17

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

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

Postal address	Facsimile	Electronic communication <i>(Please specify)</i>

Signed at _____ on this _____ day of _____ 20_____

 Signature of requester / person on whose behalf request is made

POLICY NAME	VERSION	DATE ISSUED	PAGE NO.
PAIA Manual	01.4	January 2024	18

FOR OFFICIAL USE

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

Signature of Information Officer

POLICY NAME	VERSION	DATE ISSUED	PAGE NO.
PAIA Manual	01.4	January 2024	19

Annexure B

Form 1

REQUEST FOR A COPY OF THE GUIDE

[Regulations 2 and 3]

TO: The Information Regulator

P.O. Box 31533

Braamfontein

2017

Email address:

Tel number: +27 (0) 10 023 5200

OR

The Information Officer

I,

Full names:				
In my capacity as (mark with "x")	Information Officer		Other	
Name of public/private body (if applicable)				
Postal Address:				
Street Address:				
Email Address:				
Facsimile:				

POLICY NAME	VERSION	DATE ISSUED	PAGE NO.
PAIA Manual	01.4	January 2024	20

Contact numbers:	Tel. (B):		Cellular:	
------------------	-----------	--	-----------	--

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

Language (make with "X")		No. of copies	Language (make with "X")		No. of copies
	Sepedi			Sesotho	
	Setswana			siSwati	
	Tshivenda			Xitsonga	
	Afrikaans			English	
	isiNdebele			IsiXhosa	
	isiZulu				

Manner of collection (mark with "x")

Postal address	Facsimile	Electronic communication (please specify)

Signed at _____ on this _____ day of _____ 20_____

Signature of requester

POLICY NAME	VERSION	DATE ISSUED	PAGE NO.
PAIA Manual	01.4	January 2024	21

Annexure C

FORM 3

OUTCOME OF REQUEST AND OF FEES PAYABLE

[Regulation 8]

Note:

1. If your request is granted the-
 - a) amount of the deposit, (if any), is payable before your request is processed; and
 - b) requested record/portion of the record will only be released once proof of full payment is received.
2. Please use the reference number hereunder in all future correspondence.

Reference number: _____

TO: _____

Your request dated _____, refers.

You requested:

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

POLICY NAME	VERSION	DATE ISSUED	PAGE NO.
PAIA Manual	01.4	January 2024	22

OR

You requested:

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

To be submitted:

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

Kindly note that your request has been:

Approved

POLICY NAME	VERSION	DATE ISSUED	PAGE NO.
PAIA Manual	01.4	January 2024	23

Denied for the following reasons:

Fees payable with regards to your request:

Item	Cost per A4-size page or part thereof/item	Number of pages/items	Total
Photocopy			
Printed copy			
For a copy in a computer-readable form on: (i) Flash drive (to be provided by requestor) (ii) Compact disc <ul style="list-style-type: none"> • If provided by requestor • If provided to the requestor 	R40.00 R40.00 R60.00		
For a transcription of visual images per A4-size page	Service to be outsourced. Will depend on quotation from Service provider.		
Copy of visual images			
Transcription of an audio record, per A4-size page	R24.00		
Copy of an audio record on: (i) Flash drive (to be provided by requestor) (ii) Compact disc <ul style="list-style-type: none"> • If provided by requestor 	R40.00 R40.00 R60.00		

POLICY NAME	VERSION	DATE ISSUED	PAGE NO.
PAIA Manual	01.4	January 2024	24

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

Deposit payable (if search exceeds six hours):

Yes No

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

The amount must be paid into the following Bank account:

Name of bank: _____

Name of account holder: _____

Type of account: _____

Account number: _____

Branch code: _____

Reference number: _____

Submit proof of payment to: _____

Signed at _____ on this _____ day of _____ 20_____

Signature of Information Officer

POLICY NAME	VERSION	DATE ISSUED	PAGE NO.
PAIA Manual	01.4	January 2024	25

Annexure D

Processing of Personal Information in accordance with POPIA

1. For employees

- 1.1. Verification of applicant employees' information during the recruitment process
- 1.2. General matters relating to employees:
 - 1.2.1. Pension
 - 1.2.2. Medical aid
 - 1.2.3. Payroll
 - 1.2.4. Disciplinary action
 - 1.2.5. Training
- 1.3. Any other reasonably required purpose relating to the employment or possible employment relationship

2. For vendors/ suppliers/other businesses

- 2.1. Verifying information and performing checks
- 2.2. Purposes relating to the agreement or business relationship or possible agreement or business relationships between the parties
- 2.3. Payment of invoices
- 2.4. Complying with the Attacq Group's regulatory and other obligations
- 2.5. Any other reasonably required purpose relating to the Attacq Group's business

3. For members of property associations

- 3.1. Verifying information and performing checks
- 3.2. General matters relating to members and directors of property associations:
 - 3.2.1. Members meetings
 - 3.2.2. Directors meetings and the election of directors
 - 3.2.3. Issuing of invoices for the collection of levies
- 3.3. Any other reasonably required purpose relating to the Attacq Group's membership to and management of property associations

4. For tenants or prospective tenants

- 4.1. Verifying information and performing credit checks
- 4.2. Purposes relating to the lease agreement or possible lease agreement between the parties
- 4.3. Any other reasonably required purpose relating to the Attacq Group's business

POLICY NAME	VERSION	DATE ISSUED	PAGE NO.
PAIA Manual	01.4	January 2024	26

Annexure E

Categories of Data Subjects and Personal Information relating thereto

1. Employees

- 1.1. Name and contact details
- 1.2. Identity number and identity documents (including passports)
- 1.3. Employment history and references
- 1.4. Banking and financial details
- 1.5. Details of payments to third parties (deductions from salary)
- 1.6. Employment contracts
- 1.7. Employment equity plans
- 1.8. Medical aid records
- 1.9. Pension fund records
- 1.10. Remuneration/ salary records
- 1.11. Performance appraisals
- 1.12. Disciplinary records
- 1.13. Leave records
- 1.14. Training records

2. Corporate

- 2.1. Shareholders
- 2.2. Directors

3. Vendors / suppliers/ other businesses

- 3.1. Name and contact details
- 3.2. Identity and/or company information and directors' information
- 3.3. Banking and financial information
- 3.4. Information about products or services
- 3.5. Other information not specified, reasonably required to be processed for business operations
- 3.6. "know-your customer" data
- 3.7. Payment beneficiaries – bank account details
- 3.8. Tax certificates
- 3.9. Professional curriculum vitae
- 3.10. B-BBEE certificates

4. Tenants and prospective tenants

- 4.1. Name and contact details
- 4.2. Identity and/or company information and directors' information
- 4.3. Banking and financial information
- 4.4. If signing surety, details of assets and liabilities, previous insolvency details (if applicable), marital status
- 4.5. Trading references
- 4.6. Other lessor references
- 4.7. Other information not specified, reasonably required to be processed for lease relationship
- 4.8. "know-your customer" data

5. Members and directors of property associations

- 5.1. Name and contact details
- 5.2. Identity and/or company information

POLICY NAME	VERSION	DATE ISSUED	PAGE NO.
PAIA Manual	01.4	January 2024	27

5.3. Other information not specified, reasonably required to be processed for business operations

POLICY NAME	VERSION	DATE ISSUED	PAGE NO.
PAIA Manual	01.4	January 2024	28

Annexure F

Recipients of Personal Information

1. The Attacq Group
2. Any firm, organisation or person that the Attacq Group uses to collect payments and recover debts or to provide a service on its behalf
3. Any firm, organisation or person that/who provides the Attacq Group with products or services
4. Any payment system that the Attacq Group uses
5. Regulatory and governmental authorities or ombudsmen, or other authorities, including tax authorities, where the Attacq Group has a duty to share information
6. Financial institutions from whom payments are received on behalf of Data Subjects
7. Employees, contractors and temporary staff
8. Agents and estate agent brokers

POLICY NAME	VERSION	DATE ISSUED	PAGE NO.
PAIA Manual	01.4	January 2024	29

Annexure G

Cross-border flows of Personal Information

When making authorised disclosures or transfers of Personal Information in terms of Section 72 of POPIA, Personal Information may be disclosed to recipients located in countries which do not offer a level of protection for those Data Subjects as high as the level of protection offered in South Africa.

POLICY NAME	VERSION	DATE ISSUED	PAGE NO.
PAIA Manual	01.4	January 2024	30

Annexure H

Description of security measures to be implemented by the Attacq Group

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

1. Access control of persons

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

2. Data media control

The Attacq Group undertakes to implement suitable measures to prevent the unauthorised manipulation of media, including reading, copying, alteration or removal of the data media used by the Attacq Group and containing personal data of customers, tenants, suppliers, employees and so forth.

3. Data memory control

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

4. User control

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

5. Access control to data

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

6. Transmission control

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

7. Transport control

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

8. Organisation control

The Attacq Group will maintain its internal organisation in a manner that meets the requirements of this manual.

POLICY NAME	VERSION	DATE ISSUED	PAGE NO.
PAIA Manual	01.4	January 2024	31

Annexure I

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

Regulations relating to the protection of Personal Information, 2018

Note:

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

A	DETAILS OF DATA SUBJECT
Name(s) and surname/ registered name of Data Subject	
Unique identifier / Identity Number	
Residential, postal or business address	
Contact number(s)	
Fax number / e-mail address	
B	DETAILS OF RESPONSIBLE PARTY
Name(s) and surname/ registered name of Data Subject	
Residential, postal or business address	
Contact number(s)	
fax number / email address	
C	REASONS FOR OBJECTION IN TERMS OF SECTION 11(1)(D) TO (F) (Please provide detailed reasons for the objection)

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

Signature of Data Subject

POLICY NAME	VERSION	DATE ISSUED	PAGE NO.
PAIA Manual	01.4	January 2024	32

Annexure J

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

Regulations relating to the protection of Personal Information, 2018

Note:

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

Mark the appropriate box with an "X".

Request for:

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

A	Details of Data Subject
Names(s) and surname/ registered name of Data Subject	
Unique Identifier/ Identity Number	
Residential, postal or business address	
Contact number(s)	
Fax number / email address	
B	DETAILS OF RESPONSIBLE PARTY
Name(s) and surname/ registered name of Data Subject	
Residential, postal or business address	
Contact number(s)	
Fax number / email address	
C	Reasons for objection in terms of Section 11(1)(d) to (f) (Please provide details reasons for the objection)

POLICY NAME	VERSION	DATE ISSUED	PAGE NO.
PAIA Manual	01.4	January 2024	33



D	Reasons for correction or deletion of the Personal Information about the Data Subject in terms of Section 24(1)(a) which is in possession or under the control of the Responsible Party; and or reasons for destruction or deletion of a record of Personal Information about the Data Subject in terms of Section 24(1)(b) which the Responsible Party is no longer authorised to retain (please provide detailed reasons for the request)

POLICY NAME	VERSION	DATE ISSUED	PAGE NO.
PAIA Manual	01.4	January 2024	34

A