



REGISTRATION CERTIFICATE

Registration Number: 0002855/2023-2024-IRRT/PR

This is to certify that **Hennie Marais** has been registered as the **Information Officer** with the Information Regulator by **Palgrave**, in terms of section 55(2) of the Protection of Personal Information Act 4 of 2013 on the **23 March 2023**.



Chief Executive Officer
INFORMATION REGULATOR

NB: Please note that it is your responsibility to ensure that the particulars of an Information Officer and/or Deputy Information Officer(s) are correct and updated on an annual basis or as when it becomes necessary.

SECTION 51 MANUAL FOR

PALGRAVE BODY CORPORATE

SS NO. 629/2007

**IN TERMS OF THE PROMOTION OF ACCESS TO
INFORMATION ACT NO. 2/2000 ('THE ACT')**

INDEX

NO.	DESCRIPTION	P
1.	INTRODUCTION	1
2.	LIST OF ACRONYMS AND ABBREVIATIONS	1
3.	PURPOSE OF PAIA MANUAL	1
4.	KEY CONTACT DETAILS FOR ACCESS TO INFORMATION OF PALGRAVE BODY CORPORATE	2
5.	GUIDE ON HOW TO USE PAIA AND HOW TO OBTAIN ACCESS TO THE GUIDE	3
6.	CATEGORIES OF RECORDS OF PALGRAVE WHICH ARE AVAILABLE WITHOUT A PERSON HAVING TO REQUEST ACCESS	4
7.	CATEGORIES OF RECORDS OF PALGRAVE WHICH ARE AVAILABLE IN ACCORDANCE WITH ANY OTHER LEGISLATION	4
8.	DESCRIPTION OF THE SUBJECTS ON WHICH THE BODY HOLDS RECORDS AND CATEGORIES OF RECORDS HELD ON EACH SUBJECT BY PALGRAVE	4
9.	PROCESSING OF PERSONAL INFORMATION	6
10.	AVAILABILITY OF THE MANUAL	9
11.	UPDATING OF THE MANUAL	9

1. INTRODUCTION

Palgrave is a Sectional Title Scheme established in Cape Town with SS No. 629/2007. It is governed by the provisions of the Sectional Titles Schemes Management Act. No. 8 of 2011, the Sectional Titles Act, No. 95 of 1986 and the Rules of the Body Corporate. It consists of 17 units and is a residential scheme situated at West Quay Road, V&A Waterfront, CapeTown.

2. LIST OF ACRONYMS AND ABBREVIATIONS

- | | | |
|-----|------------------|--|
| 2.1 | “Body Corporate” | Palgrave Body Corporate; |
| 2.2 | “Chairperson” | the Chairperson of the Body Corporate; |
| 2.3 | “Managing Agent” | the Managing Agent of the Body Corporate; |
| 2.4 | “Minister” | the Minister of Justice and Correctional Services; |
| 2.5 | “PAIA” | Promotion of Access to Information Act No. 2 of 2000 (as Amended); |
| 2.6 | “POPIA” | Protection of Personal Information Act No.4 of 2013; |
| 2.7 | “Regulator” | Information Regulator; |
| 2.8 | “Republic” | Republic of South Africa; and |
| 2.9 | “Trustees” | the Trustees of the Body Corporate. |

3. PURPOSE OF PAIA MANUAL

This PAIA Manual is useful for the public to:

- 3.1 check the categories of records held by a body which are available without a person having to submit a formal PAIA request;
- 3.2 have a sufficient understanding of how to make a request for access to a record of the body, by providing a description of the subjects on which the body holds records and the categories of records held on each subject;
- 3.3 know the description of the records of the body which are available in accordance with any other legislation;
- 3.4 access all the relevant contact details of the Information Officer and Deputy Information Officer (if appointed) who will assist the public with the records they intend to access;
- 3.5 know the description of the guide on how to use PAIA, as updated by the Regulator and how to obtain access to it;
- 3.6 know if the body will process personal information, the purpose of processing of personal information and the description of the categories of data subjects and of the information or categories of information relating thereto;

- 3.7 know the description of the categories of data subjects and of the information or categories of information relating thereto;
- 3.8 know the recipients or categories of recipients to whom the personal information may be supplied;
- 3.9 know if the body has planned to transfer or process personal information outside the Republic of South Africa and the recipients or categories of recipients to whom the personal information may be supplied; and
- 3.10 know whether the body has appropriate security measures to ensure the confidentiality, integrity and availability of the personal information which is to be processed.

4. KEY CONTACT DETAILS FOR ACCESS TO INFORMATION OF PALGRAVE BODY CORPORATE

4.1. Chief Information Officer

Name: Verna Kirk
Tel: 0219750710
Email: verna@vernakirk.co.za

4.2. Deputy Information Officer

Name: ***
Tel: ***
Email: ***

4.3 Access to information general contacts

Email: verna@vernakirk.co.za

4.4 Domicilium Address: The Quarterdeck, Marina Residential – The Peninsula, West Quay Road, V&A Waterfront

Postal Address: P O Box 1432, Durbanville, 7551
Physical Address: 6 Paradys Street, Amanda Glen, Durbanville, 7550
Telephone: 0219750710
Email: verna@vernakirk.co.za
Website: ***

5. GUIDE ON HOW TO USE PAIA AND HOW TO OBTAIN ACCESS TO THE GUIDE

- 5.1 The Regulator has, in terms of section 10(1) of PAIA, as amended, updated and made available the revised Guide on how to use PAIA (“Guide”), in an easily comprehensible form and manner, as may reasonably be required by a person who wishes to exercise any right contemplated in PAIA and POPIA.
- 5.2 The Guide is available in each of the official languages and in braille.
- 5.3 The aforesaid Guide contains the description of:
 - 5.3.1 the objects of PAIA and POPIA;
 - 5.3.2 the postal and street address, phone and fax number and, if available, electronic mail address of:
 - 5.3.2.1 the Information Officer of every public body, and
 - 5.3.2.2 every Deputy Information Officer of every public and private body designated in terms of section 17(1) of PAIA and section 56 of POPIA ;
 - 5.3.3 the manner and form of a request for:
 - 5.3.3.1 access to a record of a public body contemplated in section 11; and
 - 5.3.3.2 access to a record of a private body contemplated in section 50;
 - 5.3.4 the assistance available from the Information Officer of a public body in terms of PAIA and POPIA;
 - 5.3.5 the assistance available from the Regulator in terms of PAIA and POPIA;
 - 5.3.6 all remedies in law available regarding an act or failure to act in respect of a right or duty conferred or imposed by PAIA and POPIA, including the manner of lodging:
 - 5.3.6.1 an internal appeal;
 - 5.3.6.2 a complaint to the Regulator; and
 - 5.3.6.3 an application with a court against a decision by the information officer of a public body, a decision on internal appeal or a decision by the Regulator or a decision of the head of a private body;
 - 5.3.7 the provisions of sections 14 and 51 requiring a public body and private body, respectively, to compile a manual, and how to obtain access to a manual;
 - 5.3.8 the provisions of sections 15 and 52 providing for the voluntary disclosure of categories of records by a public body and private body, respectively;

- 5.3.9 the notices issued in terms of sections 22 and 54 regarding fees to be paid in relation to requests for access; and
- 5.3.10 the regulations made in terms of section 92.
- 5.4 Members of the public can inspect or make copies of the Guide from the offices of the public and private bodies, including the office of the Regulator, during normal working hours.
- 5.5 The Guide can also be obtained:
- 5.5.1 upon request to the Information Officer;
- 5.5.2 from the website of the Regulator (<https://www.justice.gov.za/infoereg/>).
- 5.6 A copy of the Guide is also available in the following official languages, for public inspection during normal office hours:
- 5.6.1 English; and
- 5.6.2 Afrikaans.

6. CATEGORIES OF RECORDS OF PALGRAVE WHICH ARE AVAILABLE WITHOUT A PERSON HAVING TO REQUEST ACCESS

Category of Records	Types of Records	Available on Website	Available upon request
1. POPIA	Policy	n/a	***
	Privacy Notice	n/a	***

7. CATEGORIES OF RECORDS OF PALGRAVE WHICH ARE AVAILABLE IN ACCORDANCE WITH ANY OTHER LEGISLATION

Category of Records	Applicable Legislation
1. PAIA Manual	Promotion of Access to Information Act 2 of 2000

8. DESCRIPTION OF THE SUBJECTS ON WHICH THE BODY HOLDS RECORDS AND CATEGORIES OF RECORDS HELD ON EACH SUBJECT BY PALGRAVE

Subjects on which the body holds records	Categories of records
1. Scheme registration / establishment documents	Certificate of establishment

	<p>Conditions imposed by the developer</p> <p>Sectional plans</p> <p>Participation quota schedule</p>
2. Governance documents and records	<p>Minutes of Trustees' meetings</p> <p>Minutes of general meetings of members</p> <p>Resolutions of the Trustees / Body Corporate members</p> <p>Register of owners / mortgagees and holders of real rights</p> <p>Individual ledger accounts in respect of each owner</p> <p>Budgets and reports</p> <p>Insurance policies and related correspondence</p> <p>Personal details of owners, occupiers and Trustees, including contact details, addresses and correspondence</p>
3. Financial records	<p>Annual financial statements</p> <p>Monthly management accounts</p> <p>Tax records and returns</p> <p>Bank statements</p> <p>Record of assets and liabilities</p> <p>Invoices</p>
4. Employment	<p>Employment contracts</p> <p>Disciplinary records</p> <p>Salary / wage records</p> <p>Leave records</p> <p>Statutory compliance records</p>
5. Other	<p>Municipal accounts</p> <p>Contractor quotations</p> <p>Contractor / service provider agreements</p> <p>Lease agreements</p>

9. PROCESSING OF PERSONAL INFORMATION

9.1 Purpose of Processing Personal Information

Information Type	Purpose
<p>Identification information: such as name, photograph, passport, national identification, biometric information, gender, date of birth, vehicle registration number, vehicle license and driving license, information regarding employer.</p>	<p>To verify the data subject's identity to, inter alia, enable him/her to enter the scheme, to provide services to him/her, undertake adequate security and monitoring measures, comply with the scheme's legal and contractual obligations, and otherwise for the scheme's legitimate interests or those of a third party.</p>
<p>Contact information: such as, email address, telephone number, physical address, unit and/or exclusive use area number.</p>	<p>To contact the data subject with information relevant to him/her as a supplier of the Association, or as an owner or occupier of a unit in the scheme (notice of meetings, letters, circulars, enforcement of the rules, repairs and maintenance, insurance claims, etc.), to keep the data subject informed about the scheme's activities and updates, to respond to any queries and requests, to manage and resolve any complaints or issues, to carry out planning and forecasting activities, to comply with the scheme's legal and contractual obligations, and otherwise for the scheme's legitimate interests or those of a third party.</p>
<p>Contact and payment information and other information of suppliers / contractors / service providers: such as, name, email, telephone number, address, payment and bank details</p>	<p>To enable the scheme to procure products and services from the data subjects, to keep the data subjects informed about the scheme's activities and updates, to respond to any queries and requests, to carry out market analysis and research, to carry out planning and forecasting activities, for other internal business processes, to comply with the scheme's legal and contractual obligations, and otherwise for the scheme's legitimate interests or those of a third party.</p>
<p>Contact and other information of Trustees, employees (past / present) / prospective employees: contact details, employment history, references, vetting information, financial information including banking details, IT information and other information relating to employment (e.g.: leave; appraisals etc.)</p>	<p>To enable the data subjects to carry out their roles / duties, to carry out the scheme's contract with the data subjects, monitor the data subject's performance and compliance with the scheme's policies / standards / procedures, provide the data subjects with training and benefits and provide remuneration, to comply with the scheme's legal and contractual obligations, and otherwise for the scheme's legitimate interests or those of a third party.</p>

Information obtained during visit: such as, CCTV images/footage, car registration information, biometric data (e.g. fingerprints or facial recognition), access records and registration details.	To allow the data subject access to the scheme in line with its security policies and procedures and to manage and resolve any legal or commercial complaints or issues, including security practices.
---	--

9.2 Description of the categories of Data Subjects and of the information or categories of information relating thereto

Categories of Data Subjects	Personal Information that may be processed
Trustees, owners and occupiers	As per the schedule in 9.1 above.
Managing Agents	As per the schedule in 9.1 above.
Employees	As per the schedule in 9.1 above.
Contractors	As per the schedule in 9.1 above.
Service providers	As per the schedule in 9.1 above.
Visitors	As per the schedule in 9.1 above.

9.3 The recipients or categories of recipients to whom the personal information may be supplied

Category of personal information	Recipients or Categories of Recipients to whom the personal information may be supplied
Identification information	Trustees, service providers such as security, SAPS, Managing Agent, contractors, employees
Contact information	Trustees, service providers such as security, SAPS, Managing Agent, contractors, employees
Contact and payment information and other information of suppliers / contractors / service providers	Trustees, service providers such as security, SAPS, Managing Agent, owners, employees
Contact and other information of trustees, employees (past / present) / prospective employees	Trustees, service providers such as security, SAPS, Managing Agent, Department of Labour, owners, employees

Information obtained during visit	Trustees, service providers such as security, SAPS, Managing Agent, employees
-----------------------------------	---

9.4 Planned transborder flows of personal information

None.¹

9.5 General description of Information Security Measures to be implemented by the responsible party to ensure the confidentiality, integrity and availability of the information

The Information Security Measures to be implemented and maintained by the Body Corporate include, but are not limited to, the following:

- 9.5.1 Ensuring safe storage of hard copies (e.g., locked drawer or filing cabinet);
- 9.5.2 Ensuring that, where personal information is stored on removable devices, that these are kept safe and secure when not in use;
- 9.5.3 Restricting access to devices by multiple users;
- 9.5.4 Ensuring that personal information is held in as few places as is necessary;
- 9.5.5 No unnecessary additional records, filing systems and data sets shall be created or kept;
- 9.5.6 Ensuring that all computers, laptops, tablets, phones and flash drives that store personal information are password protected and never left unattended, unless they are locked, off or otherwise secured;
- 9.5.7 Passwords must be strong, changed regularly and not shared with unauthorised persons;
- 9.5.8 Keeping operating systems and adequate antivirus / malware software up to date;
- 9.5.9 Taking reasonable steps to ensure that personal information is stored only for as long as it is needed or required in terms of the purpose for which it was originally collected;
- 9.5.10 Ensuring that the Trustees, Managing Agent, employees and operators delete or destroy personal information when their office expires or agreements are terminated;
- 9.5.11 Ensuring that the Trustees, Managing Agents and employees (if applicable) undergo proper, timeous and recurring training;

¹ If utilising Cloud Services, specify name, country, and types of information stored.

9.5.12 Agreements shall be concluded between the Body Corporate, Managing Agent and Operators to ensure compliance with the POPI Act, and that adequate security measures are put in place and maintained.

10. AVAILABILITY OF THE MANUAL

10.1 A copy of the Manual is available:

10.1.1 on (specify the website), if any;

10.1.2 domicile of the Body Corporate for public inspection during normal business hours;

10.1.3 to any person upon request and upon the payment of a reasonable prescribed fee; and

10.1.4 to the Information Regulator upon request.

10.2 A fee for a copy of the Manual, as contemplated in annexure B of the Regulations, shall be payable per each A4-size photocopy made.

11. UPDATING OF THE MANUAL

The Information Officer will on a regular basis update this Manual.

Issued by

Verna Kirk (Managing Agent)
(Information Officer)

**PROTECTION OF PERSONAL INFORMATION POLICY
PALGRAVE (hereafter referred to as THE HOUSING SCHEME)**

Preamble

This Policy is formulated in terms of and in accordance with the Protection of Personal Information Act 4 of 2013 ('POPIA'). This policy sets out protocols for processing of personal information as well promoting the awareness of the rights of individuals and juristic persons whose personal information it processes in the course of its business.

1. DEFINITIONS

- 1.1 **"Data Subject"** means the person whose personal information is processed.
- 1.2 **"Information Officers"** means the duly appointed Information Officer/s.
- 1.3 **"Law"** means any law of general application and includes the common law and any statute, constitution, decree, treaty, regulation, directive, ordinance, by-law, order or any other enactment of legislative measure of government (including local and provincial government) statutory or regulatory body which has the force of law;
- 1.4 **"Personal Information"** means information relating to an identifiable person, as defined in section 1 of POPIA.
- 1.5 **"Processing"** means, without limitation, the collection, use, storage, variation, merging, linking, dissemination and destruction of personal information and **Further Processing** shall bear a similar meaning, but will only occur after the initial processing of personal information.
- 1.6 **"Person"** means a natural or juristic person.
- 1.7 **"Special Personal Information"** means Personal Information as referred to in Section 26 of POPIA

- 1.8 When referring to a “**Duly Authorised Representative**”, “**Agent**” or “**Proxy**” in this document, such authorisation shall be in writing, and where applicable, comply with the requirements in line with Chapter 1 of Financial Intelligence Centre Act (FICA) or the Consumer Protection Act (CPA) and accompanying regulations or any other applicable law as the case may be.

2. INTRODUCTION

- 2.1 THE HOUSING SCHEME is committed to serve its stakeholders to the best of its abilities and in doing so, to protect their Personal Information. This policy aims to achieve that purpose and to ensure lawful processing of Personal Information.

- 2.2 This policy is applicable to any person who deals, transacts with or is within the employ of THE HOUSING SCHEME and to give effect thereto incorporated by reference in any agreement, dealing or transaction between the Data Subject and THE HOUSING SCHEME in respect whereof Personal Information is provided to or collected or otherwise processed by THE HOUSING SCHEME.

- 2.3 It is important for the Data Subject to familiarize him-,her- or itself with the contents hereof to be adequately informed about why and how their Personal Information is processed and their rights and entitlements under POPIA.

- 2.4 THE HOUSING SCHEME has duly appointed Information Officers as prescribed by POPIA. The contact details of the Information Officers are set out in the PAIA manual.

3. CONSENT FOR THE PROCESSING OF PERSONAL INFORMATION

- 3.1 THE HOUSING SCHEME will not process Personal Information without the consent of the Data Subject, either personally or on his, her or its behalf by a duly authorised representative or proxy, save where the processing of such personal information is required by Law.

- 3.2 The supply of Personal Information is voluntary unless the supply is required by Law.
- 3.3 THE HOUSING SCHEME requires specific Personal Information to be provided by the Data Subject in order to *inter alia* carry out its business functions, to serve the interests of its Stakeholders to perform in terms of contracts.
- 3.4 THE HOUSING SCHEME acknowledges a Data Subject's right to object to the processing of Personal Information.
- 3.5 Whilst THE HOUSING SCHEME acknowledges a Data Subject's right to object to the processing of Personal Information, THE HOUSING SCHEME reserves the right to withdraw or refuse its services or products where a Data Subject unreasonably refuses to consent to the processing of Personal Information.

4. SOURCING OF PERSONAL INFORMATION

- 4.1 THE HOUSING SCHEME collects Personal Information:
- 4.1.1 directly from data subjects, save where –
- 4.1.2 Personal Information is supplied by a duly authorised proxy or mandated agent of the data subject;
- 4.1.3 the Data Subject has consented to Personal Information being collected by third parties;
- 4.1.4 the collection thereof from third parties is required by Law or forms part of a public record.

5. CLASSIFICATION OF PERSONAL INFORMATION PROCESSED

5.1 The following Personal Information is processed by THE HOUSING SCHEME:

5.1.1 Information identifying individuals or juristic entities, including but not limited to: names and surnames, identification or registration numbers, passport number, sex, age, marital status, employment information, residential information or business address, nationality, citizenship, home language, preferred communication language. or such other personal information as may be required to enter into a business relationship with the data subject.

5.1.2 Financial information: Including but not limited to the Data Subject's financial institution, bank account number, branch code, salary / income.

5.1.3 Contact information: Including but not limited to physical addresses, electronic mail addresses, fax numbers, telephone numbers, cellphone numbers, postal addresses or such other contact information necessary to maintain the business relationship between THE HOUSING SCHEME and the Data Subject.

5.2 THE HOUSING SCHEME does not process any Special Personal Information as contemplated by POPIA and will not do so without the prior consent of the data subject unless required by Law.

6. PURPOSE OF PROCESSING OF PERSONAL INFORMATION

6.1 THE HOUSING SCHEME processes Personal Information for the following purposes, depending on the nature of the dealings with the Data Subject:

6.1.1 Applications for employment;

6.1.2 Applications from goods and service providers

- 6.1.3 Assessing B-BBEE status, if applicable;
- 6.1.4 Conclusion of contracts;
- 6.1.5 Creation and maintenance of Stakeholders' databases;
- 6.1.6 Human resource purposes;
- 6.1.7 Legal compliance with statutory laws and regulations;
- 6.1.8 Maintenance of registers;
- 6.1.9 Conclusion of security documents (bonds, suretyships, cessions, levy certificated, etc.); or
- 6.1.10 For any matter necessary or incidental to the effective performance of THE HOUSING SCHEME to give effect to the above matters.
- 6.1.11 For the purposes of performing the functions and duties necessary for the efficient management of the Body Corporate which includes but is not limited to:
 - Owner records
 - Contact details, telephone numbers, addresses of unit owners
 - Physical and postal addresses
 - Records as required by Management Rule 27 of the Sectional Titles Scheme Management Act
 - Purpose of Processing
 - Information necessary for the administration of the Body Corporate
 - Levy Account Records
 - Compliance with the provisions of Management Rule 27
 - Complaints and Dispute Resolution Documentation
 - Outcomes in terms of disputes and complaints
 - Details of Insurance Claims

7. SHARING OF PERSONAL INFORMATION WITH THIRD PARTIES

- 7.1 THE HOUSING SCHEME will not share the Personal Information about a Data Subject unless this has been consented to by the Data Subject, save where the sharing of Personal Information is required by Law.

7.2 THE HOUSING SCHEME shall take reasonable measures in ensuring the confidentiality of Personal Information shared with third parties and that third parties are lawfully processing Personal Information as prescribed by POPIA.

7.3 Notwithstanding clause 7.2 above and whilst THE HOUSING SCHEME endeavors to take reasonable steps as contemplated above, it cannot warrant lawful processing of Personal Information by third parties with whom the Data Subject's Personal Information has been shared.

8. WHO RECEIVES PERSONAL INFORMATION

8.1 THE HOUSING SCHEME shares or otherwise processes personal information of data subjects with various third parties in conducting its operations. THE HOUSING SCHEME shares or otherwise processes personal information with: its service providers, suppliers, employees within the scope and course of their employment, regulatory authorities or administrative bodies established by Law, industry bodies or associations where necessary, its auditors, parties to multilateral contracts of which the data subject is a party.

9. TRANSBORDER TRANSFER OF PERSONAL INFORMATION

9.1 THE HOUSING SCHEME may from time to time transfer or cause to transfer personal information of a data subject across national borders during the scope and course of its operations.

9.2 THE HOUSING SCHEME shall endeavor to transfer personal information across national borders only if the recipient third party in a receiving country is subject to laws or otherwise legally binding rules or agreements affording adequate protection measures for reasonable processing of personal information of a similar nature to the conditions for lawful processing contained in POPIA.

9.3 THE HOUSING SCHEME shall, where reasonably practicable, obtain the data subject's consent prior to transferring personal information across border.

10. VARIATION, UPDATING AND RECORD KEEPING OF PERSONAL INFORMATION

10.1 THE HOUSING SCHEME stores personal information collected from data subjects, either in hard copy or electronic format.

10.2 Personal information may be stored up to a period of 10 years, save in instances where longer storage thereof is required by law.

10.3 Whilst THE HOUSING SCHEME takes measures to verify the personal information of data subjects, it is the shared responsibility of the data subject to bring about any change in personal information or error in respect of personal information provided to the attention of THE HOUSING SCHEME. This can be done by contacting the relevant Personal Information Officer.

11. PERSONAL INFORMATION SECURITY

11.1 Whereas THE HOUSING SCHEME processes personal information both in hard copy and electronic / digital formats, it is committed to have adequate security measures in place for the prevention any compromise to personal information of data subjects under its control.

11.2 Where personal information is processed in hard copy format, THE HOUSING SCHEME, in so far as reasonably practicable, stores the personal information in secured office space or building with one, more or all of the following security features, including but not limited to:

11.2.1 Locked buildings / office spaces with other security features

11.2.2 Locked filing cabinets

11.2.3 SABS Type Approved Safes

- 11.3 Where personal information is processed in electronic format, THE HOUSING SCHEME obtains, uses and maintains and actively seeks to improve cyber security measures that protects the integrity of data containing personal information and prevents unauthorised access thereto, including the following:
- 11.3.1 Employment and contracting of information technology specialists
 - 11.3.2 Specialised software aimed at prevention of hacking, viruses, other forms of malware and cyber threats.
 - 11.3.3 Encryption of programs and data containing personal information
- 11.4 Whilst THE HOUSING SCHEME takes reasonable steps to ensure the security and integrity of personal information, the systems in place are not immune to being compromised. In the event of personal information being compromised, THE HOUSING SCHEME undertakes to notify the data subject and Information Regulator in accordance with POPIA.

12. RIGHT OF ACCESS

- 12.1 The data subject has the right to access personal information held by THE HOUSING SCHEME.
- 12.2 The data subject may exercise his / her / its right of access by following the procedure set out in Promotion of Access to Information Manual which can be found at www.bellbuoy.co.za.

13. COMPLAINTS AND DISPUTE RESOLUTION

- 13.1 THE HOUSING SCHEME takes the interests of its stakeholders and employees seriously and respects their data privacy. Should the data subject have any concerns, issues or complaints in respect of the processing of

personal information, the relevant Personal Information Officer or the Information Regulator can be contacted.

13.2 The contact details of the Personal Information Officer is as contained in the PAIA manual.

14. GENERAL

14.1 This privacy policy is effective immediately.

14.2 THE HOUSING SCHEME reserves the right to amend its privacy policy at any time.

Signature Information Officer:



Date: 23 March 2023