

The logo for Broll, featuring the word "broll" in a white, lowercase, sans-serif font on a red rectangular background.

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BROLL PROPERTY GROUP (PROPRIETARY) LIMITED
Registration Number: 2008/027519/07/07

INFORMATION MANUAL

**Compiled in terms of Section 51 of the Promotion of Access to Information Act No.2 of
2000**

June 2021

A copy of the manual will be available for inspection at the Human Rights Commission, and
at the registered office of the company and Broll Website www.broll.com

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INTRODUCTION

New legislation has been enacted called the Promotion of Access to Information Act of 2000 (hereinafter referred to as “the Act”). The purpose of this legislation is to address Section 32(2) of the Constitution, which provides that any person has a right to gain access to any information held by a public or private body. If the record is requested from a private body, the requester needs to prove that the record is required for the exercise or protection of a right.

One of the main requirements specified in the Act is the compilation of a manual that provides information on both the types and categories of records held by the public or private body. In terms of the Act, a private body includes any former or existing juristic person.

This document serves as the Information Manual of Broll Property Group (Proprietary) Limited, its subsidiaries and joint ventures (“the Broll Group”) in terms of the above mentioned Act, to provide a reference as to the records held and the process that needs to be followed to request access to such records.

COMPANY OVERVIEW

Broll Property Group (Proprietary) Limited, a company incorporated in the Republic of South Africa, offers property management, occupier services, facilities management, pest control, landscaping, cleaning, workplace solutions, auctions, sales, leasing, valuation, and consultancy services to the retail, commercial, industrial and investment markets in sub-Saharan Africa. As a result of focused team work and specialist skills, the Broll Group has acquired a reputation for achieving results through the quality and effectiveness of its services.

The Broll Group sees people and technology as the means to fulfill its objective of maximizing property potential. The company is committed to empowering and growing every person in the organisation through its equal opportunity labour practices and its investment in software technology.

SCOPE OF THE MANUAL

The scope of this manual will serve to provide a reference regarding the records held by the Broll Group.

ADMINISTRATION OF THE ACT

Section 51(1)(a)

The board of directors of Broll Property Group (Proprietary) Limited has duly authorized the contact person below to ensure that the requirements of the Act are administered in a fair, objective and unbiased manner:

Contact person: Information Officer
Mrs Beverley Esterhuizen

Postal address: PO Box 1455, Saxonwold, 2132

Physical address: 61 Katherine Street, Sandton, 2196

Telephone number: +27 (11) 441-4255/4000

E-mail: BEsterhuizen@Broll.com

GUIDE FOR REQUESTERS ON HOW TO USE THE ACT

Section 51(1)(b)

The Human Rights Commission is responsible for compiling a guide that will facilitate ease of use of the Act for requesters. This Guide will be available from the South African Human Rights Commission. Please direct any queries to:

The South African Human Rights Commission:
PAIA Unit
The Research and Documentation Department

Postal address: Private Bag 2700, Houghton, 2041

Physical address: 33 Hoofd Street
Braampark Forum 3
Braamfontein
2198

Phone: +27 (11) 877 3600
Fax: +27 (11) 403 0625
E-mail: PAIA@sahrc.org.za
Website: www.sahrc.org.za

AUTOMATIC AVAILABILITY OF CERTAIN RECORDS

Section 51(1)(c)

Records lodged in terms of Government requirements with various statutory bodies, including the Registrar of Companies.

LIST OF SUBSIDIARY COMPANIES COVERED BY THIS MANUAL

- Broll Valuation & Advisory Services (Pty) Ltd
- Internal Developers (Pty) Ltd
- Broll Risk Management (Pty) Ltd
- Broll Management Services (Pty) Ltd
- Broll FM (Pty) Ltd
- Broll Properties (Pty) Ltd
- Broll Property Management (Pty) Ltd
- Business Solutions Specialists (Pty) Ltd
- BPG Swaziland (Pty) Ltd (incorporated in Swaziland)
- Broll Property Group (Mauritius) Ltd (incorporated in Mauritius)
 - Broll Cameroon SARL (incorporated in Cameroon)
 - Broll Cote d'Ivoire SARL (incorporate in Cote d'Ivoire)
 - Broll Botswana Pty Ltd (incorporated in Botswana)
 - Broll (Zambia) Ltd (incorporated in Zambia)
 - BPG Rwanda (Ltd) (incorporated in Rwanda)
 - Africa Ascensao LDA (incorporated in Mozambique)
 - Broll Gabon SARL (incorporated in Gabon)
 - Broll Kenya Ltd (Incorporated in Kenya)
 - Broll Valuations Kenya Ltd (incorporated in Kenya)

LIST OF JOINT VENTURES INCLUDED BY THIS MANUAL

- Broll Auctions and Sales (Pty) Ltd
- Broll Consortium (Pty) Ltd
- Broll & List Property Management (Namibia) (Pty) Limited (incorporated in Namibia)
- Broll Ghana Ltd (incorporated in Ghana)
- Broll Limited (incorporated in Malawi)
- Broll Property Services Ltd (incorporated in Nigeria)
- Broll Mozambique Limitada (incorporated in Mozambique)
- Broll Rwanda Ltd (incorporated in Rwanda)
- Broll Indian Ocean Ltd (incorporated in Mauritius)
- Broll Uganda Ltd (incorporated in Uganda)

RECORDS AVAILABLE IN ACCORDANCE WITH OTHER LEGISLATION

Section 51(1)(d)

Records are kept in accordance with such other legislation as is applicable to the Broll Group which includes, but is not limited to, the following legislation:

- Administration of Estates Act No. 66 of 1965
- Arbitration Act No. 42 of 1965
- Basic Conditions of Employment Act No. 75 of 1997
- Companies Act No. 61 of 1973
- Compensation for Occupational Injuries and Health Diseases Act No. 130 of 1993
- Consumer Affairs (Unfair Business Practices) Act No. 71 of 1988
- Copyright Act No. 71 of 2008
- Corporate Laws Amendment Act No. 24 of 2006
- Credit Agreements Act No. 75 of 1980
- Currency and Exchange Act No. 9 of 1933
- Debtor Collectors Act No. 114 of 1998
- Employment Equity Act No. 55 of 1998
- Finance Act No. 35 of 2000
- Financial Advisory and Intermediary Services Act No. 37 of 2002
- Financial Intelligence Centre Act No. 36 of 2000
- Financial Relations Act No. 65 of 1976
- Financial Services Board Act No. 97 of 1990
- Harmful Business Practices Act No. 23 of 1999
- Income Tax Act No. 95 of 1967
- Insolvency Act No. 24 of 1936

- Insurance Act No. 27 of 1943
- Intellectual Property Laws Amendments Act No. 38 of 1997
- Judicial Matters Amendment Act No. 42 of 2001
- Labour Relations Act No. 66 of 1995
- Long Term Insurance Act No. 52 of 1998
- Medical Schemes Act No. 131 of 1998
- National Credit Act No. 34 of 2005
- National Environment Management Act No. 31(1) of 1998
- Occupational Health and Safety Act No. 85 of 1993
- Pensions Funds Act No. 24 of 1956
- Post Office Act No. 44 of 1958
- Protection of Personal Information Act No. 4 of 2013
- Regional Services Councils Act No. 109 of 1985
- SA Reserve Bank Act No. 90 of 1989
- Short Term Insurance Act No. 53 of 1998
- Skills Development Levies Act No. 9 of 1999
- Stamp Duties Act No. 77 of 1968
- Stock Exchange Control Act No. 1 of 1985
- Tax on Retirement Funds Act No. 38 of 1996
- Trade Marks Act No. 194 of 1993
- Unemployment Contributions Act No. 4 of 2002
- Unemployment Insurance Act No. 63 of 2001
- Usury Act No. 73 of 1968
- Value-Added Tax Act No. 89 of 1991

RECORD SUBJECTS AND CATEGORIES

Section 51(1)(e)

Property Services refers to the service offerings of the Broll Group and which includes but is not limited to property management, workplace solutions, auctions, valuations, facilities management, occupier services, sales and leasing)

The departments within Broll Group Property Services are involved in the overall management of the services provided by the Broll Group to its clients. The department's records comprise the following main categories:

- Contracts and Agreements
- General Correspondence
- General Administration Records
- Building and Property Records

Group Audit / Internal Audit

Group Audit / Internal Audit's records comprise the following main categories:

- General Correspondence
- General Administration Records
- Audit Reports and Supporting Working Papers

Corporate Accounting

The Accounting Department's records comprise the following main categories:

- Accounting Records
- General Correspondence
- Management Reports
- Transactional Records
- VAT Records
- Tax Records
- Consolidation Records
- Technical Records
- Departmental Administration Records

Corporate Communications

Corporate Communications provides public relations services to the Broll Group and is responsible for all media and investor relations. Corporate Communications' records comprise the following main categories:

- Press Releases / Statements
- Media Cuttings / Other Interaction

Labour and Environmental Law Division

The Labour and Environmental Law Division's records comprise the following main categories:

- General Correspondence

Legal Department

The Legal Department provides assistance with all corporate legal matters material to the Broll Group. The Legal Department records comprise the following category:

- General Correspondence

Company Secretarial

The Company Secretarial records comprise the following main categories:

- General Correspondence
- Trademarks
- Company and Share Registration Records
- Statutory Records
- Contracts and Agreements

Human Resources Department

The Human Resources Department's primary objective is to develop and implement a competitive human resource strategy that will support the Broll Group. Human Resources' records comprise the following main categories:

- General Correspondence
- Employee Records
- General Company and HR Policies and Procedures
- Training Records
- Pension Records
- Employee Benefit Records
- Statutory Records
- Contracts
- Labour Relations Records
- Employment Equity Records
- PAYE Records
- Policies and Procedures

Information Technology Department

The Information Technology Department is responsible for developing, supporting and providing assurance on the implementation of IT policies and standards of best practice in the Broll Group. The Department's records comprise the following main categories:

- General Correspondence
- Contracts and Agreements
- Operational Records
- IT Infrastructure Layouts and Diagrams
- Asset Records
- Policy Records

ACCESS REQUEST PROCEDURE

Section 51(1)(e)

The purpose of this section is to provide requesters with sufficient guidelines and procedures to facilitate a request for access to records held by the Broll Group.

It is important to note that an application for access to information can be refused in the event that the application does not comply with the procedural requirements of the Act. In addition, the successful completion and submission of an access request form does not automatically allow the requester access to the requested record.

Note

If it is reasonably suspected that the requester has obtained access to the Broll Group's records through the submission of materially false or misleading information, legal proceedings may be instituted against such requester.

Completion of Access Request Form

In order for the Broll Group to respond to requests in a timely manner, the Access Request Form should be completed, taking due cognizance of the following *Instructions on Completion of Forms*:

- The Access Request Form must be completed in the English language.
- Type or print in BLOCK LETTERS an answer to every question.
- If a question does not apply, state "N/A" in response to that question.
- If there is nothing to disclose in reply to a particular question, state "nil" in response to that question.

- If there is insufficient space on a printed form in which to answer a question, additional information may be provided on an additional folio.
- When the use of an additional folio is required, precede each answer thereon with the title applicable to that question.

Submission of Access Request Form

The completed Access Request Form must be submitted either via conventional mail, e-mail or fax and must be addressed to the contact person as indicated in Section 51(1)(a).

An initial, **non-refundable R50.00 request fee (excluding VAT)** is payable on submission. This fee is **not applicable** to Personal Requesters, referring to any person seeking access to records that contain their personal information.

Payment of Fees

Payment details can be obtained from the contact person as indicated in Section 51(1)(a) and payment can be made either via a direct deposit, by bank guaranteed cheque or by postal order (no credit card payments are accepted). Proof of payment must be supplied.

Note:

If the request for access is successful, an **access fee** will be required for the search, reproduction and/or preparation of the record(s) and will be calculated based on the Prescribed Fees (refer attached). The access fee must be paid prior to access being given to the requested record.

Notification

Requests will be evaluated and the requester notified within 30 days of receipt of the completed Access Request Form. Notifications may include:

Notification of Extension Period (if required)

The requesters may be notified whether an extension period is required for the processing of their requests, including:

- The required extension period, which will not exceed an additional 30-day period;
- Adequate reasons for the extension; and

- Notice that the requester may lodge an application with a court against the extension and the procedure, including the period, for lodging the application.

Payment of Deposit (if applicable)

The requester may be notified whether a deposit is required. A deposit will be required depending on certain factors such as the volume and/or format of the information requested and the time required for search and preparation of the record(s). The notice will state:

- The amount of the deposit payable (if applicable); and
- That the requester may lodge an application with a court against the payment of the deposit and the procedure, including the period, for lodging the application.

Please note:

In the event that access is refused to the requested record, the full deposit will be refunded to the requester.

Decision on Request

If no extension period or deposit is required, the requesters will be notified, within 30 days, of the decision on their requests.

If the request for access to a record is **successful**, the requester will be notified of the following:

- The amount of the access fee payable upon gaining access to the record (if any);
- An indication of the form in which the access will be granted;
- Notice that the requester may lodge an application with a court against the payment of the access fee and the procedure, including the period, for lodging the application.

If the request for access to a record is **not successful**, the requester will be notified of the following:

- Adequate reasons for the refusal (refer to Third Party Information and Grounds for Refusal below); and
- That the requester may lodge an application with a court against the refusal of the request and the procedure, including the period, for lodging the application.

Third Party Information

If access is requested to a record that contains information about a third party, the Broll Group is obliged to attempt to contact this third party to inform them of the request. This enables the third party the opportunity of responding by either consenting to the access or by providing reasons why the access should be denied.

In the event of the third party furnishing reasons for the support of denial of access, our designated contact person will consider these reasons in determining whether access should be granted, or not.

Grounds for Refusal

The Broll Group may legitimately refuse to grant access to a requested record that falls within a certain category. Grounds on which the Broll Group may refuse access include:

- Disclosure of the record (containing trade secrets, commercial, scientific, technical or any other confidential information) would harm the commercial or financial interests of the Broll Group.
- The record is privileged from production in legal proceedings, unless the legal privilege has been waived.
- Protecting personal information that the Broll Group holds about a third person (who is a natural person), including a deceased person, from unreasonable disclosure.
- Protecting commercial information that the Broll Group holds about a third party or the Broll Group (for example trade secrets: financial, commercial, scientific or technical information that may harm the commercial or financial interests of the organisation or the third party).
- Disclosure of the record would result in a breach of duty of confidence owed to a third party in terms of an agreement.
- Disclosure of the record would endanger the life or physical safety of an individual.
- Disclosure of the record would prejudice or impair the security of property or means of transport.
- Disclosure of the record would prejudice or impair the protection of a person in accordance with a witness protection scheme.
- Disclosure of the record would prejudice or impair the protection of the safety of the public.

- Disclosure of the record would put the Broll Group at a disadvantage in contractual or other negotiations or prejudice it in commercial competition.
- The record is a computer program.
- The record contains information about research being carried out or about to be carried out on behalf of a third party or the Broll Group.

Records that Cannot be Found or Do Not Exist

If the Broll Group has searched for a record and it is believed that the record either does not exist or cannot be found, the requester will be notified by way of an affidavit or affirmation. This will include the steps that were taken to try to locate the record.

PROTECTION OF PERSONAL INFORMATION PROCESSED

The company is committed to protecting the privacy of personal information of our data subjects. The information you share with us as a data subject allows us to provide you with the best experience with our products and services, or as a stakeholder.

The company has dedicated policies and procedures in place to protect all personal information collected and processed by us. We will never sell your personal information.

Please read below for more information on how we collect, process, use and disclose personal information.

The purpose of processing of personal information

We process personal information for various reasons, including but not limited to the following:

1. To manage information, products and/or services requested by data subjects;
2. To help us identify data subjects when they contact us;
3. Manage clients
4. To maintain clients records;
5. Recruitment purposes;
6. Employment purposes;
7. Internship purposes;
8. Training purposes;
9. Travel purposes;
10. General administration
11. Financial and tax purposes;
12. Legal or contractual purposes;
13. Health and safety purposes;
14. To monitor access, secure and manage our premises and facilities;
15. To transact with our suppliers
16. To improve the quality of our services;
17. To help us detect and prevent fraud and money laundering under FICA;
18. To help us recover debts;
19. Marketing purposes

Data subject categories and personal information processed

Prospective employees	Race
Employees	Gender
Clients	Sex
Suppliers	Pregnancy
Service Providers	Marital status
Business partners	National, ethnic or social origin
Visitors (Walk-in)	Age
Group companies	Physical or mental health
Shareholders	Disability
	Religion
	Language and birth of the person
	Education history
	Medical history, health
	Financial history
	Criminal history, alleged commission of offence and proceedings in respect of these offences
	Employment history
	ID number
	E-mail address
	Physical address
	Postal address
	Telephone number
	Location information
	Online identifier
	Biometric information
	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
	Name of individual if it appears with other personal information
	Trade union membership
	CCTV cameras

Recipients with whom personal information is shared

In processing your personal information, we may share it within the group of companies or with other third parties. These include but are not limited to:

- a) Statutory authorities;
- b) Law enforcement agencies;
- c) Tax authorities;
- d) Medical schemes;
- e) Employee pension and provident funds;
- f) Industry bodies;
- g) Contractors, vendors, or suppliers;
- h) Payment processors
- i) Email management and distribution tools
- j) Data storage providers
- k) Server hosts
- l) Group companies
- m) Service providers
- n) Banks
- o) Credit Bureaus
- p) Clients

Security measures implemented to protect personal information

We have identified our security risks over the personal information we process in line with the Protection of Personal Information Act, and we have implemented various security measures to ensure reasonable protection against the risk of loss, misuse, unauthorised access and disclosure, alteration and destruction of the personal information.

We also take steps to ensure that operators that process personal information on behalf of company name apply adequate safeguards as outlined above.

Trans-border flows of personal information

We may transfer to, and store personal information we collect about you, in countries other than South Africa, if the relevant business transactions or situation requires trans-border processing. These countries may not have the same data protection laws as South Africa, and in this instance we will only transfer the information if we have consent from you, or it is necessary for the performance or conclusion of a contract between us.

Personal information received from third parties

When we receive personal information from a third party on behalf of a data subject, we require confirmation that they have written consent from the data subject that they are aware of the contents of this PAIA manual and the Privacy Policy, and do not have any objection to our processing their information in accordance with this policy.

Where information on third parties is provided by a data subject, or a third party provides information on a data subject, that information may be taken into account with other personal information.

Data Breaches

Where there are reasonable grounds to believe that the personal information of a data subject has been accessed or acquired by any unauthorised person, Broll Property Group (Pty) Ltd shall notify:

- a) the Regulator; and
- b) the data subject, unless the identity of such data subject cannot be established.

The notification will be made as soon as reasonably possible after the discovery of the compromise, taking into account the legitimate needs of law enforcement or any measures reasonably necessary to determine the scope of the compromise and to restore the integrity of the responsible party's information system.

Data Subject participation

REQUEST FOR CORRECTION OR DELETION OF PERSONAL INFORMATION OR DESTROYING OR DELETION OF RECORD OF PERSONAL INFORMATION IN TERMS OF SECTION 24(1) OF THE PROTECTION OF PERSONAL INFORMATION ACT, 2013 (ACT NO. 4 OF 2013)

In order for the Broll Group to respond to requests in a timely manner, the Form 2 Request for correction or deletion of Personal Information Form should be completed, taking due cognizance of the following Instructions on Completion of Forms:

- The Form 2 Request Form must be completed in the English language.
- Type or print in BLOCK LETTERS an answer to every question.
- If a question does not apply, state "N/A" in response to that question.
- If there is nothing to disclose in reply to a particular question, state "nil" in response to that question.
- If there is insufficient space on a printed form in which to answer a question, additional information may be provided on an additional folio.
- When the use of an additional folio is required, precede each answer thereon with the title applicable to that question.

Submission of Form 2 Request for correction or deletion of Personal Information

The completed Form 2 Request Form must be submitted either via conventional mail, e-mail and must be addressed to the Information Officer as indicated in Section 51(1)(a).

On receipt of a request Broll must as soon as is reasonably practicable:

- Correct the information
- Destroy or delete the information
- Provide the data subject with credible evidence in support of the information; or
- where agreement cannot be reached between the responsible party and the data subject, and if the data subject so requests, take such steps as are reasonable in the circumstances, to attach to the information in such a manner that it will always be read

with the information, an indication that a correction of the information has been requested but has not been made.

If the responsible party has taken steps under subsection (2) that result in a change to the information and the changed information has an impact on decisions that have been or will be taken in respect of the data subject in question, the responsible party must, if reasonably practicable, inform each person or body or responsible party to whom the personal information has been disclosed of those steps.

The responsible party must notify a data subject, who has made a request in terms of subsection (1), of the action taken as a result of the request.

AVAILABILITY OF THE MANUAL

Copies of the manual are available for inspection, free of charge, at the registered office of Broll Property Group (Pty) Ltd, from the South African Human Rights Commission and at: www.broll.com.