



PARETO LIMITED
(REGISTRATION NUMBER 1998/000118/06)
(Hereinafter referred to as “Pareto”)

INFORMATION MANUAL
(POPIA & PAIA)

**Compiled in terms of section 51 of the Promotion of Access to
Information Act, No 2 of 2000**

June 2021

1. INTRODUCTION

In terms of Section 32 of the Bill of Rights in the Constitution of South Africa, Act 108 of 1996 every person has a right to access information. In order to fulfill this constitutional obligation, the Promotion of Access to Information Act 2 of 2000 ("**PAIA**") was assented to by Parliament.

The purpose of PAIA is to give effect to the constitutional right to access to any information held by the state, public and private companies as well as information held by another person that is required for the exercise or protection of any right.

2. PURPOSE

The purpose of this Information Manual ("**Manual**") is to facilitate requests for access to information held by Pareto Ltd ("**Pareto**").

This Manual is compiled in terms of section 51 of PAIA as amended by the Protection of Personal Information Act No. 4 of 2013 ("**PoPIA**").

This Manual is not exhaustive of, nor does it comprehensively deal with, every procedure provided for in PAIA or PoPIA. Requesters are advised for familiarise themselves with the provisions of PAIA before making any such requests to Pareto.

Pareto makes no representation and gives no undertaking or warranty that the information in this Manual or any information provided by it to a requester is complete or accurate, or that such information is fit for any purpose. All users of any such information shall use such information entirely at their own risk, and Pareto shall not be liable for any loss, expense, liability or claims, however arising, resulting from the use of this Manual or of any information provided by Pareto or from any error therein.

All users irrevocably agree to submit exclusively to the law of the Republic of South Africa and to the exclusive jurisdiction of the Courts of South Africa in respect of any dispute arising out of this Manual or any information provided by Pareto.

3. DEFINITIONS

- 3.1 Unless inconsistent with or otherwise indicated by the context, in this Manual, the defined words and expressions commencing with letters in bold, shall have the following meanings assigned to them in this Manual:

"data subject(s)"	means the person to whom personal information relates
"Information Officer"	means an information officer or deputy information officer as contemplated in terms of PoPIA
"PAIA"	means Promotion of Access to Information Act No. 2 of 2000
"PoPIA"	means Protection of Personal Information Act No. 4 of 2013
"personal information"	means information relating to an identifiable, living, natural person and where it is applicable, identifiable, existing juristic person, including all information as defined in the PoPIA
"processing"	means the collection, recording, collation, storage, destruction

	and transmission of personal information as more fully defined in PoPIA
“requestor”	means any person who makes a request for information from Pareto

3.2 In this Manual, unless the context indicates otherwise, any reference to:

3.2.1 the singular includes the plural and *vice versa*; and

3.2.2 one gender includes all genders.

4. MAIN BUSINESS ACTIVITIES OF PARETO AND RELEVANT CONTACT DETAILS

The main business of Pareto is that of holding and investing in immovable property.

NAME OF ENTITY	PARETO LTD
Information Officer	Mr. Ozayr Omar
Deputy Information Officer	Mrs. Andisiwe Matubatuba
Physical Address	10 th Floor East Tower, Atrium on 5 th , Sandton City, Sandton 2196
Postal Address	Po Box 1650, Sunninghill 2157
Email Address	informationofficer@pareto.co.za
Telephone Number	(011) 258 6800
Website	https://Pareto.co.za/

5. GUIDE OF SOUTH AFRICAN HUMAN RIGHTS COMMISSION

A Guide has been compiled in terms of Section 10 of PAIA by the Human Rights Commission. It contains information required by a person wishing to exercise any right contemplated by PAIA and is available in all of the official languages.

Any enquiries regarding this guide should be directed to:

South African Human Rights Commission,

PAIA UNIT, The Research and Documentation Department

Postal Address: Private Bag X2700, Houghton, 2041

Telephone Number: (011) 484-8300

Website: www.sahrc.org.za

E-mail Address: paia@sahrc.org.za.

6. INFORMATION REGULATOR CONTACT DETAILS

Any requestor who believes that Pareto has not adequately dealt with their request, or wants to lodge a complaint should be directed to:

The Information Regulator (South Africa)

Physical address: JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001

Postal address: P.O Box 31533, Braamfontein, Johannesburg, 2017
 Website: www.justice.gov.za/inforeg/
 Email: inforeg@justice.gov.za

7. RECORDS THAT ARE AVAILABLE IN TERMS OF ANY OTHER LEGISLATION IN TERMS OF SECTION 51 (1) (d) OF PAIA.

Certain records are kept in accordance with other legislation (as may be amended from time to time) which is applicable to Pareto including but 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. 71 of 2008
<i>Competition Act</i> No. 89 of 1998	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
Deeds Registries Act No. 47 of 1973	Estate Agency Affairs Act No. 112 of 1976
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. 58 of 1962
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. 107 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	Promotion of Access to Information Act No. 2 of 2000
Prevention and Combating of Corrupt Activities Act No. 12 Of 2004	Public Finance Management Act No. 1 of 1999

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
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	

8. RECORDS HELD THAT MAY BE REQUESTED IN TERMS OF SECTION 51 OF PAIA

CATEGORY	RECORD HELD
Governance	The Memorandum of Incorporation
	Company secretarial documents
	Registration with statutory bodies
Financial	Accounting records and books
	Annual Financial Reports
	Banking records
	Income Tax returns
	VAT returns
	Structured Finance Facility
	Annual Open Market Valuation information
	Auditor's report in respect of audits conducted on
	Commercial and Lease Agreements
	Management Accounts
Employment Records	List of employees
	Letters of appointment with employees and employment contracts
	Records relating to employee benefits
	Employment Equity Plan and Employment Equity Reports
	Disciplinary records and documentation pertaining to disciplinary proceedings
	Workmen's Compensation records
	Retirement benefits and medical aid records
	UIF records
	SETA records including training and skills

CATEGORY	RECORD HELD
	development records
Intellectual Property	Property databank and benchmark information
Information Technology	CCTV and Security footage
Marketing	Market Information
Insurance Records	Assets records
	Personnel related insurance
	Property related insurance
Immovable Property	Pareto asset register
Correspondence	Correspondence with third parties and internal correspondence

9. THE MANNER IN WHICH THE ABOVE RECORDS WILL BE MADE AVAILABLE

The abovementioned records may only be accessed by members of the public by completing information request and prior appointment with the Information Officers and at Pareto's physical address above during office hours.

10. INFORMATION REQUESTS PROCEDURE

Item	Detail
PROCEDURE	The requester must comply with all the procedural requirements contained in PAIA relating to the request for access to a record including that the information is required in order to exercise or protect a right.
COMPLETION OF PRESCRIBED FORM	The requester must complete the prescribed form adhering specifically to the following instructions: <ol style="list-style-type: none"> 1. request form must be completed in the English language; 2. type or print in BLOCK LETTERS an answer to every question; 3. if a question does not apply, state "N/A" in response to that question
	The completed access request form must be submitted either via conventional mail or e-mail to Pareto's information officer.
	Pareto will process the request within 30 days of receipt of a duly completed request form.
	The requester shall be informed whether access is granted or denied.
	The successful completion and submission of an access request form does not automatically allow the requester access to the requested record.
FEES PAYABLE	An initial, non-refundable R50.00 request fee (excluding VAT) is payable on submission of a request form.
	This fee is not applicable to personal requesters, meaning any

Item	Detail
	<p>person seeking access to records that contain their personal information.</p> <p>Payment details can be obtained from the information officer 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.</p> <p>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.</p>
EXEMPTION FROM PAYING ACCESS FEES	<p>The following are those exempted from paying access fees:</p> <ol style="list-style-type: none"> 1. A single person whose annual income does not exceed R14,712.00; or 2. Married persons or a person and his/her life partner whose annual income does not exceed R27,192.00
NOTIFICATION OF EXTENSION PERIOD (IF REQUIRED)	<p>The requester may be notified whether an extension period is required for the processing of their requests, including:</p> <ol style="list-style-type: none"> 1. the required extension period, which will not exceed an additional 30-day period; 2. adequate reasons for the extension; 3. notice that the requester may lodge an application with a court against the extension and the procedure, including the period, for lodging the application.
THIRD PARTY INFORMATION	<p>If access is requested to a record that contains information about a third party, Pareto is obliged to attempt to contact the 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.</p>
PAYMENT OF DEPOSIT (IF APPLICABLE)	<p>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:</p> <ol style="list-style-type: none"> 1. the amount of the deposit payable (if applicable); 2. 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; 3. in the event that access is refused to the requested record, the full deposit will be refunded to the requester.
DECISION ON REQUEST	<p>If no extension period or deposit is required, the requesters will be notified, within 30 days, of the decision on their requests.</p> <p>If the request for access to a record is successful, the requester will be notified of the following:</p> <ol style="list-style-type: none"> 1. the amount of the access fee payable upon gaining access

Item	Detail
	<p>to the record (if any);</p> <ol style="list-style-type: none"> 2. an indication of the form in which the access will be granted; 3. 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. <p>If the request for access to a record is not successful, the requester will be notified of the following:</p> <ol style="list-style-type: none"> 1. adequate reasons for the refusal (refer to Third Party Information and Grounds for Refusal below); and 2. 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.
GROUND FOR REFUSAL	<p>Pareto may legitimately refuse to grant access to a requested record that falls within a certain category. Grounds on which Pareto may refuse access include:</p> <ol style="list-style-type: none"> 1. disclosure of the record (containing trade secrets, commercial, scientific, technical or any other confidential information) would harm its commercial or financial interests; 2. the record is privileged from production in legal proceedings, unless the legal privilege has been waived; 3. protecting personal information that Pareto holds about a third person (who is a natural person), including a deceased person, from unreasonable disclosure. 4. protecting commercial information that Pareto holds about a third party or Pareto (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); 5. disclosure of the record would result in a breach of duty of confidence owed to a third party in terms of an agreement; 6. disclosure of the record would endanger the life or physical safety of an individual; 7. disclosure of the record would prejudice or impair the security of property or means of transport; 8. disclosure of the record would prejudice or impair the protection of a person in accordance with a witness protection scheme; 9. disclosure of the record would prejudice or impair the protection of the safety of the public; 10. disclosure of the record would put Pareto at a disadvantage in contractual or other negotiations or prejudice it in commercial competition; 11. the record is a computer program; 12. the record contains information about research being carried out or about to be carried out on behalf of a third party or Pareto.

11. REMEDIES AVAILABLE WHEN PARETO REFUSES A REQUEST FOR INFORMATION

11.1 Internal Remedies

Pareto does not have internal appeal procedures and the Courts will have to be approached if the request for information is refused. This would apply to any situation in which the requester wishes to appeal a decision made by the information officer.

11.2 External Remedies

A requester that is dissatisfied with an information officer's refusal to disclose information, may within 30 days of notification of the decision, apply to a Court for relief. Likewise, a third party dissatisfied with an information officer's decision to grant a request for information, may within 30 days of notification of the decision, apply to a Court for relief. For purposes of PAIA, the Courts that have jurisdiction over these applications are the Constitutional Court, the High Court or another court of similar status.

12. RECORDS THAT CANNOT BE FOUND OR DO NOT EXIST

If Pareto 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.

13. PERSONAL INFORMATION COLLECTED IN TERMS OF P_oPIA

- 13.1 The type of personal information we collect will depend on the specific purpose for which it is collected and processed. In this regard Pareto will only collect such information as is needed for that specific purpose.
- 13.2 Pareto may collect information relating to a data subject, including, but not limited to-
 - 13.2.1 information relating to the race, gender, sex, pregnancy, marital status, national, ethnic or social origin, sexual orientation, age, physical or mental health, disability, religion, conscience, belief, culture, language and birth of the data subject;
 - 13.2.2 information relating to the education or the medical, financial, criminal or employment history of the data subject;
 - 13.2.3 any identifying number, symbol, e-mail address, physical address, telephone number, location information, online identifier or other particular assignment to the data subject;
 - 13.2.4 the biometric information of the data subject;
 - 13.2.5 the personal opinions, views or preferences of the data subject;
 - 13.2.6 correspondence sent by the data subject that is implicitly or explicitly of a private or confidential nature or further correspondence that would reveal the contents of the original correspondence;
 - 13.2.7 the views or opinions of another individual about the data subject.

14. THE PURPOSE OF PROCESSING PERSONAL INFORMATION

Pareto will collect personal information from our employees, customers, tenants and suppliers as well as any other natural or legal persons (being data subjects) and process it in order (i) to provide a service; (ii) to help us improve our service offerings; (iii) to comply with regulatory and legislative requirements; and (iv) for legal and operational reasons.

15. CATEGORIES OF DATA SUBJECTS

Pareto holds information and records on the following categories of data subjects (being employees, customers, tenants and suppliers as well as any other natural or legal persons):

DATA SUBJECT CATEGORY	INFORMATION HELD MAY INCLUDE
Natural persons	Names; contact details; physical and postal addresses; date of birth; ID number; tax-related information, nationality, gender; confidential correspondence
Juristic persons/ entities	Names of contact persons; name of legal entity; physical and postal address and contact details; financial information; registration number; founding documents; tax-related information; authorised signatories, beneficiaries, ultimate beneficial owners
Foreign persons/ entities	Names; contact details; physical and postal addresses; date of birth; passport number; tax-related information; nationality; gender; confidential correspondence
Intermediary/Advisor	Names of contact persons; name of legal entity; physical and postal address and contact details; financial information; registration number; founding documents; tax-related information; behaviour signatories, beneficiaries, ultimate beneficial owners
Contracted service providers	Names of contact persons; name of legal entity; physical and postal address and contact details; financial information; registration number; founding documents; tax-related information; transaction records, behaviour signatories, beneficiaries, ultimate beneficial owners; BEE certificates
Employees/directors	Gender; pregnancy; marital status; race; age; disability information; language; education information; financial information as required for statutory reporting; employment history; education history; CVs; banking details; income tax reference numbers; remuneration and benefit information; ID number; physical and postal address; contact details; opinions; criminal behaviour; wellbeing; details related to employee performance and disciplinary procedures

16. SHARING OF PERSONAL INFORMATION WITH THIRD PARTIES

Pareto will take all appropriate steps to ensure that it does not share the personal information of data subjects with third parties outside of these parameters:

- 16.1 Its approved suppliers and/or third parties who are involved in the delivery of services to the data subject or Pareto, whether within the Republic of South Africa or elsewhere. In this

regard, Pareto has service level agreements in place to ensure that its suppliers also comply with its privacy standards;

- 16.2 a credit bureau or a government agency with the data subject's consent and/or it is only in the execution of a legitimate purpose or required by law;
- 16.3 a third party in order to obtain the personal information that Pareto needs, Pareto will not disclose more of a data subjects personal information than it needs to.

17. STORAGE OF PERSONAL INFORMATION

- 17.1 The personal information which Pareto collects from data subjects may be transferred to, processed at and stored at a destination outside of South Africa by staff operating outside the country who works for one of our suppliers.
- 17.2 All personal information provided to Pareto will be stored in secure information technology systems and/or servers which will be updated periodically to ensure the most appropriate level of protection. To this extent, Pareto makes use of generally accepted security practices and procedures in its Information Technology infrastructure.
- 17.3 However, the transmission of data via the internet is not completely secure. Although Pareto will endeavour to take appropriate steps to protect the data subject's personal information, Pareto cannot guarantee the security of any data transmitted through the internet. Accordingly, any such transmissions will be at the data subject's own risk. Once Pareto has received a data subject's personal information, Pareto will use appropriate procedures and security features to prevent any loss, leakage or unauthorised access of the data subject's personal information from its Information Technology infrastructure.

18. AVAILABILITY OF MANUAL

- 18.1 This Manual is available for inspection at the physical address of Pareto, details contained in item 4 above, free of charge.
- 18.2 The Manual may also be accessed on the website of Pareto (www.Pareto.co.za).

SIGNED AT SANDTON ON

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