

	PAIA MANUAL	
	POLICY NUMBER	REVISION NUMBER
		2
		EFFECTIVE DATE

INFORMATION MANUAL PREPARED IN TERMS OF SECTION 51 OF THE PROMOTION OF ACCESS TO INFORMATION ACT, NO. 2 of 2000

1. INTRODUCTION & PURPOSE

The Promotion of Access to Information Act of 2000 (the “Act”) gives effect to section 32 of the Constitution of the Republic of South Africa of 1996, which guarantees the right of access to information.

The Act establishes the legal framework for individuals to request information and sets out the procedures and limitations applicable to requests for access to information.

In terms of Section 51 of the Act, all private bodies are generally required to compile an Information Manual ("PAIA Manual"), subject to certain exemptions. When a request for information is made under the Act, the relevant private body must evaluate the request in accordance with its provisions. Access may be granted unless the request falls under one of the specific grounds for refusal provided for in the Act or other applicable legislation. The Act prescribes the procedure for submitting and processing such requests.

The Act further recognises that the right of access to information is not absolute and must be balanced against justifiable limitations, including but not limited to:

- Protection of personal privacy;
- Protection of commercially sensitive information;
- Protection of confidential government information; and
- Considerations for effective, efficient, and good governance.

This PAIA Manual provides guidance for requestors submitting information requests to Greenstreet 1 (Pty) Ltd, registration no. 2020/103202/07 (the “Company”), and outlines the procedures for submitting such requests in compliance with the Act.

2. CONTACT DETAILS AND GENERAL INFORMATION

The Company is a private company incorporated in accordance with the laws of the Republic of South Africa.

All requests for information addressed to the Company, in terms of the Act, must be in writing

and addressed to:

The Information Officer: Marisa Bester

The Assistant Information Officer: Chloe Pearl

Registered address: 17 Melrose Boulevard, Melrose Arch, Johannesburg, Gauteng, 2196

Principal Place of Business: Unit F09, The Courtyard, 1 West Park, Century City, Cape Town, 7441

Postal address: 17 Melrose Boulevard, Melrose Arch, Johannesburg, Gauteng, 2196

Telephone number: +27 (0)21 795 0126

Email: marisa.bester@stanlib.com and chloe@greenstreetmanagement.co.za

All information requests, correspondence, notices, and other documentation to be marked for the attention of: Chloe Pearl

Any person wishing to lodge a complaint regarding the processing of personal information or access to information may contact the Information Regulator using the following details:

Website: www.inforegulator.org.za

General enquiries: enquiries@inforegulator.org.za

PAIA enquiries: PAIAComplaints@inforegulator.org.za

3. GUIDELINES IN TERMS OF SECTION 10 ON HOW TO USE THE ACT

A guide on how to use the Act to obtain information is available from the Information Regulator (South Africa) in all official languages.

The following contact details can be used to direct queries addressed to the South African Human Rights Commission:

Postal Address: P.O. Box 31533, Braamfontein, Johannesburg, 2017

Telephone number: +27 (0)10 023 5200

Email: PAIACompliance@inforegulator.org.za

Website: www.inforegulator.org.za

4. RECORDS AVAILABLE IN TERMS OF OTHER LEGISLATION

The Company acknowledges that certain records may be accessible in accordance with other applicable legislation, as amended from time to time. The following laws govern the availability of such records:

- Labour Relations Act of 1995
- Employment Equity Act of 1998
- Basic Conditions of Employment Act of 1997
- Compensation for Occupational Injuries and Diseases Act of 1993

- Companies Act of 2008
- Unemployment Insurance Act of 2001
- Value Added Tax Act of 1991
- Income Tax Act of 1962
- Skills Development Act of 1998
- Protection of Personal Information Act of 2013
- Occupational Health and Safety Act of 1993
- National Environmental Management: Biodiversity Act of 2004
- National Environmental Management Act of 1998

Records governed by the aforementioned legislation may be made available in accordance with their specific provisions, in addition to the provisions of the Act.

5. PRIVACY PRACTICES

Personal Information Collected

The Company collects the following categories of personal information:

- Identity Data
- Contact Data
- Financial Data
- Transaction Data
- Service Data
- Technical and Electronic Communication Data
- Usage Data
- Marketing and Communications Data
- Any other personal information processed for lawful business purposes

Purposes of Collecting Personal Information

The Company may collect personal or other information for the following purposes:

- To provide its services;
- To operate its facilities and projects;
- To comply with statutory obligations, including submissions to the Companies and Intellectual Property Commission and interactions with other regulatory authorities;
- To conduct business case analysis;
- To carry out recruitment exercises, including referrals and hiring processes, as well as capturing job applicant details and providing status updates. In this context, the Company may conduct criminal record and credit checks;
- To provide marketing communications relevant to an individual or to share Company-related information;
- To manage and update databases of clients, suppliers, and contractors;
- To protect its rights in any litigation proceedings;
- To communicate with individuals and maintain records of such communications;
- To inform individuals about changes to the Company's Privacy Policy or other relevant

- updates;
- For other lawful purposes related to its business activities.

Further details relating to our Privacy Policy may be found on the Company's website:

www.greenstreetinvestments.co.za

6. ACCESS TO RECORDS

The following records of the Company may be available upon request:

- Companies Act records;
- Financial records;
- Operational records;
- Employment records;
- Employment policies;
- Information technology records;
- Occupational Health and Safety records;
- Environmental records;
- Other party records.

Please take note

Recording a category or subject matter in this PAIA Manual does not guarantee that a request for access to such records will be granted. Each request will be assessed individually based on its merits, and the Company reserves the right to deny access in accordance with the provisions of the Act.

Request procedures

Any person wishing to gain access to information ("the requestor") must use the prescribed form (see Annexure A attached hereto) to make the request for access to information. This request must be made in writing and addressed to the Assistant Information Officer using the contact details set out above.

The requestor must –

- provide sufficient detail on the request form to enable the Information Officer to identify the record and the requestor;
- indicate in which form of access is required;
- specify a postal address (within South Africa) or email address for purposes of correspondence regarding the request; and
- identify the right that the requestor is seeking to exercise or protect and provide an explanation of why the requested record is required for the exercise of that protection.

If a request is made on behalf of another person, the requestor must provide satisfactory proof of their authority to act in that capacity to the Information Officer.

The Information Officer shall, as soon as reasonably possible, and in any event within the period

prescribed by the Act, notify the requestor whether the request has been granted or refused. The period for responding to a request may be extended where permitted by the Act, in which event the requestor will be notified of the extension and the reasons therefor.

If the request is approved, an access fee will be applicable to cover the costs of searching, reproducing, and preparing the record, as well as any additional time exceeding the prescribed hours required for these tasks.

If, after taking reasonable steps to locate the requested record, it cannot be found or appears not to exist, the Company will inform the requestor accordingly.

7. AVAILABILITY OF THE PAIA MANUAL

This PAIA Manual is available for inspection free of charge at the Company's registered address as referred to above and may also be made available electronically upon request..

8. FEES

The Act provides for two kinds of fees –

- Request fee: non-refundable administration fees paid by all requestors (except personal requestors as defined in the Act and referred to below);
- Access fee: paid by all requestors only when access is granted. The fee is intended to reimburse the Company for the costs involved in searching for a record and preparing it for delivery to the requestor.

The Company retains the right to withhold access to records until the applicable request fee and, if necessary, deposits have been paid. The fees are as follows:

Item	Description	Amount
1.	Request fee, payable by every requester	R140.00
2.	Photocopy or printed black & white copy for every A4 page	R2.00 per page or part of the page
3.	Printed copy of A4-size page	R2.00 per page or part of the page

Item	Description	Amount
4.	For a copy in a computer-readable form on: • a flash drive (provided by the requester) • a compact disc (CD) if the requester provides the CD • a compact disc (CD) if the Company gives the CD to the requester	R40.00 R40.00 R60.00
5.	For a transcription of visual images, for an A4-size page or part of the page	This service will be outsourced, and the fee will be determined based on the quotation provided by the service provider
6.	For a copy of visual images	This service will be outsourced, and the fee will be determined based on the quotation provided by the service provider
7.	For a transcription of an audio record, per A4-size page	R24.00
8.	• For a copy of an audio record on a flash drive (provided by the requester) • For a copy of an audio record on compact disc (CD) if the requester provides the CD • For a copy of an audio record on compact disc (CD) if the Company gives the CD to the requester	R40.00 R40.00 R60.00

Item	Description	Amount
9.	- For each hour or part of an hour (excluding the first hour) reasonably required to search for and prepare the record for disclosure - The search and preparation fee cannot exceed R435.00	R145.00 Maximum amount charged: R435.00
10.	Deposit: if the search exceeds 6 hours	One-third of the amount per request (calculated in relation to items 2 to 8 above)
11.	Postage, email or any other electronic transfer	Actual expense, if any

If the Company has voluntarily provided the Minister with a list of categories of records that are automatically available to the public, the only applicable charge for obtaining such records will be a reproduction fee.

When a request is submitted for access to information held by the Company, and the requestor is not seeking their own personal information ("personal requestors"), a request fee of up to R140.00 may be payable in advance before the request is processed.

An access fee is required for all granted requests, except where specifically exempted under the Act or where an exemption has been determined by the Minister in terms of Section 54(8) of the Act.

9. DEPOSIT

In accordance with section 54(2) of the Act, the Company may require a deposit in cases where the time spent searching for a record exceeds 6 hours. The deposit will represent one third of the access fee payable by the requestor.

10. GROUNDS FOR REFUSAL OF ACCESS TO RECORDS OF A PRIVATE BODY

See Annexure B attached.

11. RIGHT OF APPEAL

As the Company is a private body, no internal appeal procedure is available under the Act.

A requestor or third-party who is dissatisfied with a decision of the Information Officer may lodge a complaint with the Information Regulator or apply to a court of competent jurisdiction for appropriate relief in accordance with the provisions of the Act.

12. UPDATES TO THIS PAIA MANUAL

This PAIA Manual will be updated whenever the Company makes material changes to the current information.

13. PRESCRIBED FORMS

See Annexure A attached.

FORM 2

REQUEST FOR ACCESS TO RECORD

[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:

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Fax number:

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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 <i>(when made on behalf of another person)</i>			
Postal Address			
Street Address			
E-mail Address			
Contact Numbers	Tel. (B):		Facsimile:
	Cellular:		
Full names of person on whose behalf request is made <i>(if applicable)</i> :			
Identity Number			

Postal Address			
Street Address			
E-mail Address			
Contact Numbers	Tel. (B)		Facsimile
	Cellular		
PARTICULARS OF RECORD REQUESTED <i>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.)</i>			
Description of record or relevant part of the record:			
Reference number, if available			
Any further particulars of record			
TYPE OF RECORD <i>(Mark the applicable box with an "X")</i>			
Record is in written or printed form			
Record comprises virtual images <i>(this includes photographs, slides, video recordings, computer-generated images, sketches, etc)</i>			
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 <i>(Mark the applicable box with an "X")</i>	
Printed copy of record <i>(including copies of any virtual images, transcriptions and information held on computer or in an electronic or machine-readable form)</i>	
Written or printed transcription of 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 aforementioned right:	
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FEES	
a)	<i>A request fee must be paid before the request will be considered.</i>
b)	<i>You will be notified of the amount of the access fee to be paid.</i>
c)	<i>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.</i>
d)	<i>If you qualify for exemption of the payment of any fee, please state the reason for exemption</i>
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 (Please specify)

Signed at _____ this _____ day of _____ 20 _____

Signature of Requester / person on whose behalf request is made

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

GROUND FOR REFUSAL OF ACCESS TO RECORDS OF A PRIVATE BODY

Access to records may be refused on any of the grounds for refusal contemplated in Chapter 4 of Part 3 of the Promotion of Access to Information Act, 2000, including the protection of personal information, confidential information, commercial information, legally privileged information, research information, and the safety of individuals and property.