

REALNET HOLDINGS PROPRIETARY LIMITED

REG NO: 2000/018707/07

Access to Information Manual



We respect your right of access to information. This document will help you exercise that right as required by section 51 of the Promotion to Access of Information Act 2 of 2000 (PAIA).

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INTRODUCTION

RealNet Holdings (Pty) Ltd is the franchisor and licensor of the brand “RealNet” and as such, has licenced a number of independently owned real estate agencies to trade under the name and style of “RealNet” (collectively “RealNet”). All RealNet entities are duly registered with the Property Practitioners Regulatory Authority. RealNet Holdings (Pty) Ltd carries on business of franchising in the real estate industry.

RealNet provides the following services -

- the listing, promotion, sale and letting of immovable property across Southern Africa;
- immovable property marketing, sales consultation and viability studies;
- commercial, agricultural and residential immovable property evaluations;
- commercial, agricultural and residential immovable property broking;
- commercial and residential immovable property management and letting; and
- real estate agency and agent franchise and licensing services.

This document is RealNet' 'Access to Information Manual' as contemplated in section 51 of PAIA. Its purpose is to help you access information in our possession. The provisions of PAIA require us to make this manual available to you so that you -

- know what type of information we have; and
- can request access to it.

This manual exists to tell you what information we have and help you get access to it.

OUR DETAILS

Our details are as follows:

Enterprise Name:	RealNet Holdings Proprietary Limited
Registration Number:	2000/018707/07
Registered Address:	Boardwalk Office Park, Block 15 Ground Floor, Boardwalk Boulevard, Faerie Glen, Pretoria, 0043
Telephone:	0860460460
Contact Person:	Chantelle Aarloo and/or Cathy Compion
Email:	chantelle@realnet.co.za and/or cathy@realnet.co.za
Website:	www.realnet.co.za
Information Officer	Chantelle Aarloo
Deputy Information Officer	Cathy Compion

These are all our details, but please rather contact us by email at chantelle@realnet.co.za and/or cathy@realnet.co.za whenever possible.

FURTHER GUIDANCE

Requesters are referred to the 'Guide' compiled by the Information Regulator, which is available in a range of official languages and contains information for the purposes of exercising constitutional rights. Please contact the Information Regulator or visit their website for more information on how you can get access to information under PAIA, and to access the Guide.

The contact details of the Information Regulator are:

- **Postal address:** P.O Box 3153, Braamfontein, Johannesburg, 2017
- **Physical address:** Woodmead North Office Park, Maxwell Drive, Woodmead, Johannesburg, 2191
- **Phone number:** 010 023 5200
- **Website:** www.inforegulator.org.za
- **General e-mail:** enquiries@inforegulator.org.za
- **PAIA Complaints email:** PAIAComplaints@inforegulator.org.za
- **POPIA Complaints email:** POPIAComplaints@inforegulator.org.za

For further guidance on how you can get access to information, please visit:

<https://inforegulator.org.za/>

RECORDS WE HOLD

We hold the following subjects and categories of records, the more specific details of which are set out below -

- company records;
- business records;
- financial records;
- insurance records;
- personnel records;
- policies and directives;
- agreements or contracts;
- regulatory documents;
- published information;
- customer information; and
- reference materials.

Please note that records that are 'not automatically available,' must be requested using the process outlined in the 'How to request access' section of this manual.

RealNet has not published any notices under Section 52 of PAIA. This means that, aside from records automatically available through legislation or voluntarily disclosed in this manual, access to our records will only be granted in accordance with the procedures outlined in this manual.

We hold various subjects and categories of records in electronic or physical form that are available automatically or in other ways.

Company records

Company records are all our records related to the incorporation and administration of our company. Some of them are available from the Companies and Intellectual Property Commission (CIPC).

Memorandum of incorporation	Automatically available from CIPC
Directors' names	Automatically available from CIPC
Documents of incorporation	Automatically available from CIPC
Minutes of board of directors meetings	Not automatically available
Written resolutions	Not automatically available
Records relating to appointment of directors, auditor, secretary, public officer, or other officers	Not automatically available
Share register and other statutory registers	Not automatically available
Other statutory records	Not automatically available

Business records

Business records include any documents that have economic value to the business.

Operational records	Not automatically available
Databases	Not automatically available
Published works	Not automatically available
Internal and/or external correspondence	Not automatically available
Product records	Not automatically available
Minutes of Meetings	Not automatically available
Records of Legal Matters	Not automatically available
Property Management Records	Not automatically available
Property Letting Records, including advertisements, records of properties rented out on behalf of client and letting performance records	Not automatically available
Property documents relating to firm's owned premises	Not automatically available
Training material	Not automatically available

Financial records

Financial records are all our records related to our finances.

Financial statements	Not automatically available
Tax returns and tax records	Not automatically available
Other documents relating to taxation of the company	Not automatically available
Accounting records	Not automatically available
Auditor and trust account annual audit reports	Not automatically available
Banking, business account and trust account records	Not automatically available
Banking details	Not automatically available

Bank statements	Not automatically available
Electronic banking records	Not automatically available
Paid cheques	Not automatically available
Asset register	Not automatically available
Invoices or Receipts	Not automatically available
Financial agreements	Not automatically available

Insurance records

Insurance records are all our records related to our insurable assets.

Insurance policies held by the company	Not automatically available
Records of insurance claims	Not automatically available
Register of all immovable property owned by the company	Not automatically available

Income tax records

Income tax records are all our records related to our income tax obligations.

PAYE Records	Not automatically available
Corporate tax records	Not automatically available
Customs tax	Not automatically available
Documents issued to employees for income tax purposes	Not automatically available
Records of payments made to SARS on behalf of employees	Not automatically available
VAT records	Not automatically available
Regional Services Levies	Not automatically available
Skills Development Levies	Not automatically available
UIF	Not automatically available
Workmen's Compensation	Not automatically available

Personnel records

Personnel records are all our records about anyone who works for us, provides services to us, or provides services on our behalf and who receives or is entitled to receive remuneration, including our employees, contractors, and other personnel.

List of current and past employees or agents up to past three years	Not automatically available
Employee personal information	Not automatically available
Employee employment contracts	Not automatically available
Employment applications and appointment letters	Not automatically available
Employment policies and procedures	Not automatically available
Employment Equity Plan	Not automatically available
Health and safety records	Not automatically available
Medical aid records	Not automatically available
Salaries or wages of employees	Not automatically available
Leave records	Not automatically available
Internal evaluations and performance records	Not automatically available
Disciplinary records	Not automatically available

Disciplinary codes	Not automatically available
Training records	Not automatically available
Operating manuals	Not automatically available
Personal records provided by personnel	Not automatically available
Other statutory records	Not automatically available
Related correspondence	Not automatically available

Policies and directives

Policies and directives include both internal and external documents.

Internal relating to employees and the company	Not automatically available
External relating to clients and other third parties	Not automatically available
Information technology systems and documents	Not automatically available

Agreements or contracts

Agreements or contracts include the documents themselves and all related documents.

Standard Agreements	Not automatically available
Contracts concluded with customers	Not automatically available
NDA's	Not automatically available
Letters of Intent, MOUs	Not automatically available
Third party contracts (such as JV agreements, VAR Agreements, etc.)	Not automatically available
Office management contracts	Not automatically available
Bond agreements	Not automatically available
Rental agreements	Not automatically available
Supplier or service contracts	Not automatically available

Regulatory documents

Regulatory documents include any documents required to comply with any laws.

Permits	Not automatically available
Licences	Not automatically available
Authorities	Not automatically available
Fidelity Fund Certificates for our firm, its Principals and Agents	Not automatically available

Published information

Published information includes any document that we prepare and produce.

Brochures	Automatically available on request
External newsletters and circulars	Automatically available
Information available on the website	Automatically available
Internal newsletters and circulars	Not automatically available
Information on the company published by third parties	Not automatically available

Customer information

Customer information includes any information about anyone that we provide goods or services to, including our customers, leads, or prospects.

Customer details	Not automatically available
Contact details of individuals within customers	Not automatically available
Communications with customers	Not automatically available
Sales records	Not automatically available
Transactional information	Not automatically available
Marketing records	Not automatically available
Client Verification Reports required i.t.o. FICA	Not automatically available
Reports (if any) submitted to the FIC	Not automatically available
Sales Records: Advertisements, Valuations and Mandates; records of Sales concluded by firm	Not automatically available
Sales Performance Reports	Not automatically available

Reference materials

Reference materials include any sources of information that we contribute to.

Books	Not automatically available
Newsletters and journals articles	Not automatically available
Magazines	Not automatically available
Newspaper articles	Not automatically available

INFORMATION WE HOLD TO COMPLY WITH THE LAW

We hold records for the purposes of PAIA in terms of the following main laws, among others:

- Basic Conditions of Employment Act 75 of 1997;
- Broad Based Black Economic Empowerment Act 53 of 2003;
- Companies Act 61 of 1973;
- Companies Act 71 of 2008;
- Compensation for Occupational Injuries and Disease Act 130 of 1993;
- Competition Act 89 of 1998;
- Consumer Protection Act 68 of 2008;
- Copyright Act 98 of 1978;
- Electronic Communications Act 36 of 2005;
- Electronic Communications and Transactions Act 25 of 2002;
- Employment Equity Act 55 of 1998;
- Financial Intelligence Centre Act 38 of 2001;
- Income Tax Act 58 of 1962;
- Intellectual Property Laws Amendment Act, No 38 of 1997;
- Intellectual Property Laws Amendment Act, No 28 of 2013;
- Labour Relations Act 66 of 1995;
- National Credit Act 34 of 2005;
- Occupational Health and Safety Act 85 of 1993;

- Prescription Act 18 of 1943;
- Prevention & Combating of Corrupt Activities Act 12 of 2004;
- Prevention of Constitutional Democracy Against Terrorist & Related Activities Act 33 of 2004;
- Prevention of Organised Crime Act 121 of 1998;
- Promotion of Equality and Prevention of Unfair Discrimination Act 4 of 2000;
- Protected Disclosures Act 26 of 2000;
- Promotion of Access to Information Act, No 2 of 2000;
- Protection of Constitutional Democracy against Terrorist and Related Activities Act 33 of 2004;
- Protection of Personal Information Act 4 of 2013;
- Regulation of Interception of Communications and Provision of Communication related Information Act 70 of 2002;
- Skills Development Act 97 of 1998;
- Skills Development Levies Act 9 of 1999;
- Tax Administration Act 28 of 2011;
- Trade Marks Act 194 of 1993;
- Unemployment Contributions Act 4 of 2002;
- Unemployment Insurance Act 63 of 2001;
- Unemployment Insurance Contributions Act 4 of 2002; and
- Value Added Tax Act 89 of 1991.

HOW TO REQUEST ACCESS

We have authorised and designated our information officer to deal with all matters relating to PAIA in order to comply with our obligations in terms of PAIA. To request access to a record for RealNet, please complete Form 2 which is available from (annexed below for ease of reference) -

- The Information Regulator website at <https://inforegulator.org.za/wp-content/uploads/2020/07/InfoRegSA-PAIA-Form02-Reg7.pdf>

Please submit the completed form to our information officer together with the relevant request fee (details here: [how-much-it-will-cost-you](#)) at our information officer's email address, or our physical address, in terms of our details provided above. Please ensure that the completed form -

- has enough information for the information officer to identify you, the requested records, and which form of access you require;
- specifies your email address, or postal address,
- describes the right that you seek to exercise or protect;
- explains why you need the requested record to exercise or protect that right;
- provides any other way you would like to be informed of our decision other than in writing; and
- provides proof of the capacity in which you are making the request if you are making it on behalf of someone else (we will decide whether this proof is satisfactory).

If you do not use the standard form we may -

- reject the request due to lack of procedural compliance;
- refuse it if you do not provide sufficient information; or
- delay it.

You may request information by completing a request for access form and submitting it to our information officer together with a request fee.

GROUNDS FOR REFUSAL

We may have to refuse you access to certain records in terms of PAIA to protect:

- someone else's personal privacy;
- another person's or entity's commercial information (especially if access would put us in breach of a duty of confidence);
- the safety of individuals and property;
- records privileged from production in legal proceedings; or
- financial, commercial, scientific or technical information;
- sensitive research information.

We will notify you in writing whether your request has been approved or denied within 30 calendar days after we have received a completed request for access form. If we cannot find any requested record or it does not exist, then we will notify you by way of affidavit that it is not possible to give access to that particular record.

We may have to refuse you access to a record to protect others.

HOW WE WILL GIVE YOU ACCESS

We will evaluate and consider all requests to us in terms of PAIA. If we approve your request for access to our records, then we will decide how to provide access to you – unless you have asked for access in a specific form. Publication of this manual does not give rise to any rights to access information records, except in terms of PAIA.

HOW MUCH IT WILL COST YOU

You must pay us a request fee as required by law when submitting a request for access to information. Please refer to 'Form 03: Outcome of request and of fees payable [Regulation 8]' which is available on the website of the Information Regulator at www.inforegulator.org.za under the section 'PAIA /Forms'.

You must pay us the fees before we will hand over any information. You may have to pay a further access fee if we grant the request for any time that has exceeded the prescribed hours to search and prepare the record for disclosure.

HOW WE PROCESS AND PROTECT PERSONAL INFORMATION

We process the personal information of various categories of people for various purposes as set out in this clause.

Categories of people

We process the personal information of the following categories of people:

- customers or clients;
- prospects or leads;
- employees;
- recruiters and medical practitioners providing services related to employees;
- contractors, vendors, or suppliers;
- children and their guardians;
- debtors and creditors;
- dealers; and
- directors and shareholders.

Purposes

We process the personal information to:

- provide our goods or supply our services;
- better understand our data subjects' needs when doing so;
- keep our data subject records up-to-date;
- manage employees in general;
- manage supplier contracts in general;
- manage dealer relationships in general;
- manage customers in general;
- manage customer credit in general;
- market to customers in various countries;
- educate children in general;
- enforce debts;
- market goods and services to prospects;
- run promotional competitions for businesses;
- process customer requests or complaints; and
- process personal information of employees for forensic purposes.

Categories of personal information

We process many different categories of personal information, including:

- contact details, such as phone numbers, physical and postal addresses, and email addresses;
- personal details, such as names and ages;
- demographic details, such as races and age groups;
- health information;
- biometric information;
- account numbers;
- background information;
- contract information;

- credit information;
- market intelligence information;
- learner information; and
- debt and debtor information.

Third-party disclosures

We give the following people personal information that we process in the ordinary course of business to fulfil our obligations to our customers or clients:

- law enforcement or regulatory bodies, attorneys, originators, contractors, vendors, or suppliers;
- agents, distributors, or other resellers;
- operators, other responsible parties, or co-responsible parties; and
- third party vendors (such as software developers) to help us maintain our services.

Cross-border transfers

We send personal information outside of South Africa to various countries. We will only transfer data to other countries who have similar privacy laws to South Africa's, or recipients who can guarantee the protection of personal information to the same standard we must protect it.

Security

We secure data by maintaining reasonable measures to protect personal information from loss, misuse, and unauthorized access, disclosure, alteration and destruction. We also take reasonable steps to keep personal information accurate, current, complete, confidential and reliable for its intended use.

We do our best to keep all data in our possession secure and up-to-date.

Data subject requests

In terms of Section 23 of POPIA, a data subject has the right to:

- Request what personal information the company holds about them and the purpose for which it is being processed.
- Be informed of how their personal information is being processed, kept and how to keep it up to date

We give effect to data subjects rights. Send the completed Section 23 form to the designated Information Officer, along with the applicable request fee, as outlined in the manual.

REMEDIES

If your request for access is denied, you may -

- apply to a court with appropriate jurisdiction, or
- lodge a complaint with the Information Regulator,

for the necessary relief.

AVAILABILITY OF THIS MANUAL

This manual is available in English and will be available on our website, and at our company offices. The manual is also electronically available on our website at: www.realnet.co.za

UPDATES TO THIS MANUAL

This manual will be updated whenever we make material changes to the current information.

SECTION 23 POPIA REQUEST FORM

Request for Access to Personal Information

In terms of Section 23 of the Protection of Personal Information Act, 4 of 2013 ("POPIA")

1. Requester Details (Data Subject)

Full Names	
ID/Passport Number	
Contact Number	
Email Address	
Postal Address	

2. Proof of Identity

(Attach a certified copy of your identity document/passport to verify your identity.)

3. Nature of the Request

(Please tick the appropriate box and provide details where necessary)

- I request confirmation as to whether the organisation holds personal information about me.
- I request access to a record or description of the personal information held about me.
- I request information about the categories of third parties who have, or have had, access to my personal information.

4. Description of the Personal Information Requested

(Provide sufficient detail to enable the responsible party to locate the record/information.)

5. Preferred Method of Access

- Email
- Printed copy (collection/post)
- Other (please specify): _____

6. Declaration

I declare that the information provided in this request is accurate and that I am entitled to request access to the personal information under section 23 of POPIA. I understand that the responsible party may request additional information to verify my identity and may charge a reasonable fee *(if applicable)* as prescribed.

Signature: _____

Date: _____

7. For Office Use Only

Date Received	
Reference Number	
Identity Verified	
Date Responded	
Outcome	

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:

Fax number:

Mark with an "X"

Request is made in my own name

Request is made on behalf of another person.

PERSONAL INFORMATION			
Full Names			
Identity Number			
Capacity in which request is made <i>(when made on behalf of another person)</i>			
Postal Address			
Street Address			
E-mail Address			
Contact Numbers	Tel. (B):		Facsimile: <input type="text"/>
	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
(Mark the applicable box with an "X")

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

MANNER OF ACCESS
(Mark the applicable box with an "X")

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

PARTICULARS OF RIGHT TO BE EXERCISED OR PROTECTED

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.

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:	

FEEES	
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 <i>(Please specify)</i>

Signed at _____ this _____ day of _____ 20 _____

Signature of Requester / person on whose behalf request is made

FOR OFFICIAL USE

Reference number:	
Request received by: <i>(State Rank, Name And Surname of Information Officer)</i>	
Date received:	
Access fees:	
Deposit (if any):	

Signature of Information Officer

FORM 3
OUTCOME OF REQUEST AND OF FEES PAYABLE
 [Regulation 8]

Note:

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

Reference number: _____

TO: _____

Your request dated _____, refers.

1. You requested:

Personal inspection of information 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>) is free of charge. You are required to make an appointment for the inspection of the information and to bring this Form with you. If you then require any form of reproduction of the information, you will be liable for the fees prescribed in Annexure B.	
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OR

2. You requested:

Printed copies of the information (<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 information on flash drive (<i>including virtual images and soundtracks</i>)	
Copy of information on compact disc drive (<i>including virtual images and soundtracks</i>)	
Copy of record saved on cloud storage server	

3. To be submitted:

Postal services to postal address	
Postal services to street address	
Courier service to street address	
Facsimile of information in written or printed format (<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>)	

Kindly note that your request has been:

Approved

Denied, for the following reasons:

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4. Fees payable with regards to your request:

Item	Cost per A4-size page or part thereof/item	Number of pages/items	Total
Photocopy			
Printed copy			
For a copy in a computer-readable form on:			
(i) Flash drive	R40.00		
• To be provided by requestor			
(ii) Compact disc	R40.00		
• If provided by requestor			
• If provided to the requestor	R60.00		
For a transcription of visual images per A4-size page	Service to be outsourced. Will depend on the quotation of the service provider		
Copy of visual images			
Transcription of an audio record, per A4-size	R24.00		
Copy of an audio record			
(i) Flash drive	R40.00		
• To be provided by requestor			
(ii) Compact disc	R40.00		
• If provided by requestor			
• If provided to the requestor	R60.00		
Postage, e-mail or any other electronic transfer:	Actual costs		
TOTAL:			

5. Deposit payable (if search exceeds six hours):

Yes

No

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

The amount must be paid into the following Bank account:

Name of Bank: _____
 Name of account holder: _____
 Type of account: _____
 Account number: _____
 Branch Code: _____
 Reference Nr: _____
 Submit proof of payment to: _____

Signed at _____ this _____ day of _____ 20 _____

 Information officer