

FYND REAL ESTATE (PTY) LTD

Registration Number: 2026/091988/07
("the Company")

PAIA MANUAL

Prepared in terms of section 51 of the
Promotion of Access to Information Act 2 of 2000 (as amended),
read with the Regulations Relating to the Promotion of Access to Information, 2021

Date of compilation	29 June 2026
Date of last revision	29 June 2026
Next scheduled review	June 2027

1. LIST OF ACRONYMS AND ABBREVIATIONS

In this Manual, unless the context indicates otherwise, the following words and abbreviations bear the meanings assigned to them below:

Abbreviation	Meaning
the Company / FYND	FYND Real Estate (Pty) Ltd
DIO	Deputy Information Officer
FFC	Fidelity Fund Certificate issued by the PPRA
FIC	The Financial Intelligence Centre
FICA / FIC Act	Financial Intelligence Centre Act 38 of 2001, as amended
Head of the Private Body	The director of the Company designated as, and acting as, the Information Officer of the Company in terms of section 1 of PAIA
IO	Information Officer
Minister	Minister of Justice and Constitutional Development
PAIA / the Act	Promotion of Access to Information Act 2 of 2000, as amended
Personal Information	Personal information as defined in section 1 of POPIA
POPIA	Protection of Personal Information Act 4 of 2013
PP Act / PPA	Property Practitioners Act 22 of 2019, as amended
PPRA	The Property Practitioners Regulatory Authority established under the PP Act
Regulations	The Regulations Relating to the Promotion of Access to Information, 2021 (GN R757 in Government Gazette 45057 of 27 August 2021), as amended
Regulator	The Information Regulator (South Africa) established in terms of section 39 of POPIA
Republic	The Republic of South Africa
Request	A request for access to a record in terms of section 50 of PAIA
Requester	Any person making a request for access to a record of the Company

2. PURPOSE OF THIS PAIA MANUAL

This Manual is published in terms of section 51 of PAIA. It serves as a reference guide to enable members of the public to:

- 2.1 identify the categories of records held by the Company that are available without a person having to submit a formal request for access;
- 2.2 understand how to make a request for access to a record held by the Company, by providing a description of the subjects on which the Company holds records and the categories of records held on each subject;
- 2.3 identify any records of the Company that are available in accordance with any other legislation;
- 2.4 obtain the contact details of the Information Officer and the Deputy Information Officer, who will assist members of the public with requests for access to information;
- 2.5 understand and obtain access to the Guide on how to use PAIA, as updated and published by the Regulator;

- 2.6 understand whether the Company processes personal information, and if so, the purpose of such processing;
- 2.7 understand the categories of data subjects and the information or categories of information relating to them;
- 2.8 identify the recipients or categories of recipients to whom the personal information may be supplied;
- 2.9 understand whether the Company plans to transfer or process personal information outside the Republic, and the recipients or categories of recipients to whom such information may be supplied; and
- 2.10 understand whether the Company has appropriate security measures in place to ensure the confidentiality, integrity and availability of the personal information that it processes.

3. KEY CONTACT DETAILS OF THE COMPANY

All requests for access to records held by the Company, and any enquiries relating to this Manual, must be directed to the Information Officer at the contact details set out below.

3.1 Information Officer (Head of the Private Body)

Field	Details
Name	Craig Luke
Designation	Director / Information Officer
Telephone	072 319 3416
Email	craig@fyndrealestate.co.za

3.3 Registered and Head Office

Field	Details
Physical address	33D Oak Street, Northmead, Benoni, Gauteng, 1501
Postal address	33D Oak Street, Northmead, Benoni, Gauteng, 1501
General email	info@fyndrealestate.co.za
Website	www.fyndrealestate.co.za

4. DETAILS OF THE INFORMATION REGULATOR

A requester who is dissatisfied with the way in which the Company has dealt with a request for access to information may lodge a complaint with the Information Regulator. The contact details of the Regulator are as follows:

Field	Details
Name	The Information Regulator (South Africa)
Physical address	Woodmead North Office Park, 54 Maxwell Drive, Woodmead, Johannesburg, 2191
Postal address	P.O. Box 31533, Braamfontein, Johannesburg, 2017
Telephone	+27 (0)10 023 5200
Toll free	080 001 7160
PAIA / POPIA complaints email	complaints.IR@inforegulator.org.za

Field	Details
General enquiries email	enquiries@infoeregulator.org.za
Website	www.infoeregulator.org.za

5. THE GUIDE ON HOW TO USE PAIA

5.1 The Regulator has, in terms of section 10(1) of PAIA, updated and made available a Guide on how to use PAIA (“the Guide”) in an easily comprehensible form and manner, as may reasonably be required by a person who wishes to exercise any right contemplated in PAIA and POPIA.

5.2 The Guide contains a description of, among other things: the objects of PAIA and POPIA; the contact details of the Information Officer and Deputy Information Officer of every public and private body; the manner and form of a request for access to a record; the assistance available from the Information Officer and from the Regulator; all remedies in law available in respect of an act or failure to act in respect of a right or duty conferred by PAIA and POPIA; and the fees payable in relation to requests.

5.3 The Guide is available in each of the official languages and in braille.

The Guide may be obtained:

- on the website of the Regulator at www.infoeregulator.org.za;
- upon request from the Information Officer or Deputy Information Officer of the Company; and
- by inspection at the offices of the Regulator during normal office hours.

6. HOW TO SUBMIT A REQUEST FOR ACCESS TO A RECORD

6.1 A requester must be given access to a record of the Company if the record is required for the exercise or protection of any right; the requester complies with the procedural requirements of PAIA; and access is not refused on any ground for refusal contemplated in Chapter 4 of Part 3 of PAIA.

6.2 A request for access to a record of the Company must be made on the prescribed Form 2 (Request for Access to Record) set out in Annexure A to the Regulations. The repealed “Form A” and “Form C” may no longer be used. The Company will not accept or process a request submitted on any repealed form.

6.3 Form 2 must be completed in full and submitted to the Information Officer at the email address set out in paragraph 3.1 above. The requester must:

- provide sufficient particulars to enable the Deputy Information Officer to identify the record(s) and the requester;
- indicate which form of access is required;
- specify a postal address, fax number or electronic mail address in the Republic;
- identify the right that the requester is seeking to exercise or protect, and explain why the requested record is required for that purpose; and
- if the request is made on behalf of another person, submit proof of the capacity in which the requester is making the request, to the satisfaction of the Deputy Information Officer.

6.4 The Deputy Information Officer will respond to the request within 30 (thirty) days of receipt of the request, subject to any extension permitted under section 57 of PAIA.

6.5 Form 2 is available on the website of the Regulator (www.infoeregulator.org.za), from the Company’s website, and from the Deputy Information Officer on request.

7. FEES PAYABLE

- 7.1 Two types of fees may be payable in respect of a request, namely a request fee and an access fee, as prescribed in Annexure B to the Regulations.
- 7.2 Where a request is for access to a record containing personal information about the requester, no request fee is payable.
- 7.3 In any other case, the Deputy Information Officer will by notice require the requester to pay the prescribed request fee before further processing the request. Once the request has been processed and access is to be granted, the requester will be notified of the access fee (if any) payable before access is given.
- 7.4 The amounts of the request fee and the access fees, including fees for reproduction, search and preparation, and postage, are those prescribed from time to time in Annexure B to the Regulations, which schedule applies as amended.

8. REMEDIES AVAILABLE TO A REQUESTER

- 8.1 PAIA does not provide for an internal appeal against a decision of the head of a private body. There is therefore no internal appeal process within the Company.
- 8.2 A requester who is dissatisfied with a decision of the Company (including a refusal of access, a decision on fees, or a failure to respond within the prescribed period) may:
- lodge a complaint with the Information Regulator in terms of section 77A of PAIA, on the prescribed Form 5, within 180 days of the decision; or
 - apply to a court (the High Court or a Magistrate's Court designated under PAIA) for appropriate relief in terms of section 78 of PAIA.

9. RECORDS AVAILABLE WITHOUT A PERSON HAVING TO REQUEST ACCESS

In terms of section 52 of PAIA, the Company has elected to make the following categories of records available without a person having to submit a formal request. The availability of these records does not preclude the Company from applying the grounds for refusal in Chapter 4 of Part 3 of PAIA where applicable.

Category of records	Type of record	How it may be accessed
Corporate / general	Company profile and "about us" information	Company website
Property listings	Property advertisements, listings, brochures and marketing material	Company website / on request
Compliance	This PAIA Manual	Company website / on request
Compliance	Privacy / POPIA notice	Company website / on request
Compliance	Fidelity Fund Certificate issued by the PPRA	On request
Commercial	Standard mandate terms and standard lease terms	On request
Transformation	B-BBEE certificate or affidavit	On request
Careers	Advertised vacancies	Company website / on request

10. RECORDS AVAILABLE IN ACCORDANCE WITH OTHER LEGISLATION

Certain records of the Company are created, kept or made available in accordance with other legislation. These records are not necessarily available for inspection by members of the public, and access remains subject to PAIA. The principal categories are:

Category of records	Applicable legislation
Memorandum of Incorporation, statutory registers, share register and minutes	Companies Act 71 of 2008
Annual financial statements and accounting records	Companies Act 71 of 2008
Income tax, VAT, PAYE and related tax records	Income Tax Act 58 of 1962; Value-Added Tax Act 89 of 1991; Tax Administration Act 28 of 2011
Registration as a property practitioner, Fidelity Fund Certificates, mandates, trust-account records and records of conduct	Property Practitioners Act 22 of 2019
Customer due diligence and verification records, the Risk Management and Compliance Programme, and records of cash and reportable transactions	Financial Intelligence Centre Act 38 of 2001
Lease agreements, deposit records and landlord-and-tenant records	Rental Housing Act 50 of 1999
Consumer transaction, marketing and disclosure records	Consumer Protection Act 68 of 2008
Property transfer and conveyancing documentation	Deeds Registries Act 47 of 1937
Employee, payroll and employment records	Basic Conditions of Employment Act 75 of 1997; Labour Relations Act 66 of 1995; Employment Equity Act 55 of 1998; Unemployment Insurance Act 63 of 2001
Occupational health and safety records	Occupational Health and Safety Act 85 of 1993
Workplace injury and compensation records	Compensation for Occupational Injuries and Diseases Act 130 of 1993
Skills development and training records	Skills Development Act 97 of 1998
B-BBEE records	Broad-Based Black Economic Empowerment Act 53 of 2003
Records of processing of personal information	Protection of Personal Information Act 4 of 2013
This PAIA Manual	Promotion of Access to Information Act 2 of 2000

11. SUBJECTS ON WHICH THE COMPANY HOLDS RECORDS

The following is a description of the subjects on which the Company holds records and the categories of records held on each subject:

Subject	Categories of records
Corporate governance and statutory	Memorandum of Incorporation, statutory registers, share register, board and shareholder resolutions and minutes
Finance and accounting	Annual financial statements, management accounts, general ledger, trust and business banking account records, commission and invoice records, and tax records

Subject	Categories of records
Human resources	Employment contracts, payroll, leave, benefits, disciplinary, performance and training records of staff and property practitioners
Property sales and marketing	Listings, sole and open mandates, offers to purchase, deeds of sale, buyer and seller records, show-house and enquiry records, and marketing material
Property rentals and management	Lease agreements, tenant and landlord records, rental applications, deposit records, rental payment and arrears records, and inspection and maintenance records
FICA and regulatory compliance	Customer due diligence and identity-verification records, the Risk Management and Compliance Programme, and PPRA registration and Fidelity Fund Certificate records
Information technology	System records, user data, backups and security records
Legal and contracts	Mandates, sale and lease agreements, service-provider contracts, NDAs and correspondence
Health, safety and facilities	Occupational health and safety records, incident reports and facilities records

12. PROCESSING OF PERSONAL INFORMATION

12.1 Purpose of processing

The Company processes personal information in the course of conducting its business as a property practitioner and estate agency, including the marketing and sale of immovable property and the letting and management of rental property. Personal information is processed for the following purposes, among others: marketing and sale of property; listing and mandate administration; the processing of offers to purchase and agreements of sale; facilitation of bond and finance applications; lease administration, rental collection and property management; tenant screening and rental applications; customer due diligence and verification in terms of FICA; the receipt and administration of trust monies and deposits; client and supplier relationship management; invoicing, commission and payment administration; employment and payroll administration; marketing and communications; and compliance with statutory, tax and regulatory obligations, including those under the Property Practitioners Act and POPIA.

12.2 Categories of data subjects and personal information processed

Category of data subject	Personal information that may be processed
Sellers and buyers of property	Names, identity numbers, contact details, addresses, marital status and matrimonial property regime, banking details, income and affordability information, FICA verification documents, and details of the property concerned
Landlords and tenants	Names, identity numbers, contact details, addresses, employment and income information, banking details, credit and payment history, FICA verification documents, and lease and deposit records
Prospective buyers, tenants and enquiry contacts	Names, contact details, property preferences and affordability information
Suppliers and service providers	Contact persons' names, company registration and VAT numbers, addresses, banking details and trade references

Category of data subject	Personal information that may be processed
Employees and job applicants (including property practitioners)	Names, identity numbers, contact details, addresses, qualifications, CVs, Fidelity Fund Certificate details, tax and banking details, remuneration, and performance and disciplinary records
Directors and shareholders	Names, identity numbers, addresses and shareholding details
Website users and marketing contacts	Names, email addresses, contact details and communication preferences

12.3 Recipients or categories of recipients

Category of personal information	Recipients or categories of recipients
Property transfer information	Conveyancing and transferring attorneys
Bond and finance information	Banks, bond originators and mortgage providers
Property registration information	The Registrar of Deeds (Deeds Office)
Tax and transfer-duty information	South African Revenue Service
Banking and payment information	The Company's bankers and payment processors
Tenant-screening and credit information	Credit bureaus and tenant-screening providers
Regulatory and compliance information	The Property Practitioners Regulatory Authority and the Financial Intelligence Centre
Rates, utilities and municipal information	Municipalities and managing agents / bodies corporate
Financial and accounting information	Auditors, accountants and professional advisors
Employee information	Payroll, retirement-fund and medical-scheme administrators
Any information	Courts, law-enforcement agencies and regulators, where required by law

12.4 Planned transborder flows of personal information

The Company may transfer or process personal information outside the Republic, for example where information is hosted by cloud-service providers, customer-relationship-management platforms or property-marketing platforms whose servers are located offshore. Any such transfer is carried out in accordance with the conditions set out in section 72 of POPIA.

12.5 Information-security measures

The Company has implemented reasonable technical and organisational measures to safeguard the confidentiality, integrity and availability of the personal information in its possession or under its control. These measures include access controls and user authentication, role-based permissions, firewalls, antivirus and anti-malware software, encryption of information in transit and (where appropriate) at rest, secure data backups, controls over trust-account and banking information, physical access controls to its premises, confidentiality undertakings with employees, operator agreements with third-party processors in terms of section 21 of POPIA, and the periodic review of these measures.

13. AVAILABILITY OF THIS MANUAL

A copy of this Manual is available:

- on the Company's website at **www.fyndrealestate.co.za**;
- at the head office of the Company for inspection during normal business hours;
- to any person upon request and upon payment of the prescribed fee; and

- to the Information Regulator upon request.

A fee for a copy of this Manual, as contemplated in Annexure B to the Regulations, is payable per A4-size copy.

14. UPDATING OF THIS MANUAL

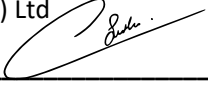
The Information Officer will review and update this Manual as and when necessary, and at least once a year. The date of the most recent revision is recorded on the cover page.

APPROVAL

This Manual is approved and issued by the Head of the Private Body.

Craig Luke

Director / Information Officer
FYND Real Estate (Pty) Ltd

Signature:  _____

Date: 29/06/2026