

# PROMOTION OF ACCESS TO INFORMATION ACT MANUAL

*Prepared in terms of Section 51 of the Promotion of Access to Information Act 2 of 2000 (as amended).*

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| <b>NAME OF BODY:</b>          | David Miller and Associates (Pty) Ltd trading as Harcourts Platinum |
| <b>REGISTRATION NUMBER:</b>   | 1972/008481/07                                                      |
| <b>DATE OF COMPILATION:</b>   | 22/05/2026                                                          |
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## 1. LIST OF ACRONYMS AND ABBREVIATIONS

- “CEO” Chief Executive Officer
- “IO” Information Officer
- “DIO” Deputy Information Officer
- “Minister” Minister of Justice and Correctional Services
- “PAIA” Promotion of Access to Information Act No. 2 of 2000 (as Amended)
- “POPIA” Protection of Personal Information Act No. 4 of 2013
- “Regulator” Information Regulator
- “Republic” Republic of South Africa
- “The Body” David Miller and Associates (Pty) Ltd
- “The Company” David Miller and Associates (Pty) Ltd

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## 2. PURPOSE OF A PAIA MANUAL

This Manual serves to:

- 2.1. Note the categories of records held by a body which are available without having to submit a formal PAIA request;
- 2.2. Have sufficient understanding of how to make a request for access to a record of the body, by providing a description of the subjects on which the body holds records and the categories of records held on each subject;
- 2.3. Know the description of the records of the body which are available in accordance with any other legislation;
- 2.4. Access all the relevant contact details of the Information Officer and Deputy Information Officer who will assist the public with the records they intend to access;
- 2.5. Know the description of the guide on how to use PAIA, as updated by the Regulator and how to obtain access to it;
- 2.6. Know if the body will process personal information, the purpose of processing of personal information and the description of the categories of data subjects and of the information or categories of information relating thereto;
- 2.7. Know the description of the categories of data subjects and of the information or categories of information relating thereto;
- 2.8. Know the recipients or categories of recipients to whom the personal information may be supplied;
- 2.9. Know if the body has planned to transfer or process personal information outside the Republic of South Africa and the recipients or categories of recipients to whom the personal information may be supplied; and
- 2.10. Know whether the body has appropriate security measures to ensure the confidentiality, integrity and availability of the personal information which is to be processed.

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## 3. KEY CONTACT DETAILS FOR ACCESS TO INFORMATION OF THE COMPANY

- 3.1. Chief Information Officer
  - Name: Stephen Caradoc-Davies
  - Tel: +27 21 8512614
  - Email: [steve.cd@harcourts.co.za](mailto:steve.cd@harcourts.co.za)
- 3.2. Deputy Information Officer
  - Name: Cesare Castignani
  - Tel: +27 21 851 2614
  - Email: [gm.platinum@harcourtsd.co.za](mailto:gm.platinum@harcourtsd.co.za)
- 3.3. General Contact
  - Email: [info.platinum@harcourts.co.za](mailto:info.platinum@harcourts.co.za)

- 3.4. Main Office / Place of Business
    - Postal Address: P.O. Box 37, Somerset West, 7130
    - Physical Address: 13 Utel Crescent, Triangle Point, Somerset West, 7130)
    - Telephone: +27 21 851 2614
    - [Harcourtsplatinum.co.za](http://Harcourtsplatinum.co.za)
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#### 4. GUIDE ON HOW TO USE PAIA AND HOW TO OBTAIN ACCESS TO THE GUIDE

- 4.1. The Regulator has, in terms of section 10(1) of PAIA, as amended, updated and made available the revised Guide on how to use PAIA ("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.
- 4.2. The Guide is available in each of the official languages and in braille.
- 4.3. The aforesaid Guide contains the description of:
  - 4.3.1. The objects of PAIA and POPIA;
  - 4.3.2. The postal and street address, phone and fax number and, if available, electronic mail address of:
    - 4.3.2.1. The Information Officer of every public body, and
    - 4.3.2.2. Every Deputy Information Officer of every public and private body designated in terms of section 17(1) of PAIA and section 56 of POPIA;
  - 4.3.3. The manner and form of a request for:
    - 4.3.3.1. Access to a record of a public body contemplated in section 11; and
    - 4.3.3.2. Access to a record of a private body contemplated in section 50;
  - 4.3.4. The assistance available from the IO of a public body in terms of PAIA and POPIA;
  - 4.3.5. The assistance available from the Regulator in terms of PAIA and POPIA;
  - 4.3.6. All remedies in law available regarding an act or failure to act in respect of a right or duty conferred or imposed by PAIA and POPIA, including the manner of lodging:
    - 4.3.6.1. An internal appeal;
    - 4.3.6.2. A complaint to the Regulator; and
    - 4.3.6.3. An application with a court against a decision by the information officer of a public body, a decision on internal appeal or a decision by the Regulator or a decision of the head of a private body;
  - 4.3.7. The provisions of sections 14 and 51 requiring a public body and private body, respectively, to compile a manual, and how to obtain access to a manual;
  - 4.3.8. The provisions of sections 15 and 52 providing for the voluntary disclosure of categories of records by a public body and private body, respectively;
  - 4.3.9. The notices issued in terms of sections 22 and 54 regarding fees to be paid in relation to requests for access; and

- 4.3.10. The regulations made in terms of section 92.
- 4.4. Members of the public can inspect or make copies of the Guide from the offices of the public and private bodies, including the office of the Regulator, during normal working hours.
- 4.5. The Guide can also be obtained:
  - 4.5.1. Upon request to the Information Officer;
  - 4.5.2. From the Information Regulator:
    - Physical Address: 54 Maxwell Drive, Woodmead, Johannesburg, 2191
    - Website: [www.inforegulator.org.za](http://www.inforegulator.org.za)
- 4.6. A copy of the Guide is also available in Afrikaans and Zulu for public inspection during normal office hours.

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## 5. CATEGORIES OF RECORDS OF THE COMPANY WHICH ARE AVAILABLE WITHOUT HAVING TO SUBMIT A PAIA REQUEST

*(Including but not limited to)*

| Category of Records                                            | Types of the Record                                |
|----------------------------------------------------------------|----------------------------------------------------|
| Personnel Records                                              | Name, Email, Tel., Designation.                    |
| Customer Records                                               | Name, Email, Tel., Email Subscriptions and Alerts. |
| Property Listings                                              | Sales and Rental Property Details.                 |
| Office Information                                             | General Franchise and Branch Information.          |
| Public Service Information News, Marketing and Press Releases. |                                                    |

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## 6. DESCRIPTION OF THE RECORDS OF THE COMPANY WHICH ARE AVAILABLE IN ACCORDANCE WITH ANY OTHER LEGISLATION

*(Including but not limited to)*

| Category of Records                                        | Applicable Legislation                           |
|------------------------------------------------------------|--------------------------------------------------|
| MOI, Company Registration and Corporate Governance Records | Companies Act 71 of 2008                         |
| PAIA Manual                                                | Promotion of Access to Information Act 2 of 2000 |
| POPIA Manual                                               | Protection of Personal Information Act 4 of 2013 |
| Property and Transaction Records                           | Property Practitioners Act 22 of 2019            |

|                                                                                                          |                                                                     |
|----------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------|
| Personnel/HR Records                                                                                     | Basic Conditions of Employment Act 75 of 1997                       |
| Personnel/HR Records                                                                                     | Employment Equity Act 55 of 1998                                    |
| Tax Invoices, Credit Notes, Debit Notes, Bank Statements, Deposit Slips, Personnel details and Contracts | Unemployment Insurance Act 63 of 2001                               |
| Accounting and Financial Records                                                                         | Income Tax Act 58 of 1962                                           |
| Personnel/HR Records                                                                                     | BBBEE Act 53 of 2003                                                |
| Know Your Client (KYC) Records                                                                           | Financial Intelligence Centre Act 38 of 2001                        |
| Disciplinary Records                                                                                     | Labour Relations Act 66 of 1995                                     |
| OHS agreements, appointment letters, incident reports, Visitor Details                                   | Occupational Health and Safety Act 85 of 1993                       |
| Personnel/HR Records                                                                                     | Compensation for Occupational Injuries and Diseases Act 130 of 1993 |
| Consumer Transactions, Contracts and Complaint Resolution Records                                        | Consumer Protection Act 68 of 2008                                  |
| Electronic Transaction and Communication Records                                                         | Electronic Communications and Transactions Act 25 of 2002           |
| SETA Reports, Skills Development Levies, Training Plans and Annual Training Reports                      | Skills Development Act 97 of 1998                                   |
| Tax Invoices, Credit Notes, Debit Notes, Bank Statements, Deposit Slips, Personnel details and Contracts | Unemployment Insurance Contributions Act 4 of 2002                  |
| SARS and VAT Records                                                                                     | Value Added Tax Act 89 of 1991                                      |

## 7. DESCRIPTION OF THE SUBJECTS ON WHICH THE COMPANY HOLDS RECORDS AND CATEGORIES OF RECORDS HELD ON EACH SUBJECT

*(Including but not limited to)*

- Finance: Contracts/Agreements, Transactional Records, Financials, Company Registration documents, Franchise Agreements, Policy and Procedure Manuals.
- HR: Employee Records, Contracts, Policy and Procedure Manuals.
- Customer Records: Contact details, Property details, FICA documents, Contracts, Correspondence, Property Transaction records.
- Partners and Service Providers: Contact details, Contracts/Agreements, Financial Records, Correspondence.

## 8. PROCESSING OF PERSONAL INFORMATION

### 8.1. Purpose of Processing Personal Information

The Company processes personal information for legitimate business purposes, including but not limited to:

- Employment administration and human resource management.
- Legal and regulatory compliance.
- Financial administration and reporting.
- Internal governance, audits and security controls.
- For the purpose of business conducted in relation to Real Estate and the facilitation of the Sale, Purchase, Letting or Rental of property in service to its customers and other stakeholders.

### 8.2. Description of the categories of Data Subjects and of the information or categories of information relating thereto

- Offices: Contact and physical address details, Financials, Company Registration documents, Franchise Agreements, Policy and Procedure Manuals.
- Personnel: Name, Tel., Address, Employment History, Contracts, Policy and Procedure Manuals.
- Customers: Contact details, Property details, FICA documents, Contracts, Correspondence, Property Transaction records.
- Partners and Service Providers: Contact details, Contracts/Agreements, Financial Records, Correspondence.

### 8.3. The recipients or categories of recipients to whom the personal information may be supplied

| Categories of Personal Information | Recipients or Categories of Recipients to whom the personal information may be supplied |
|------------------------------------|-----------------------------------------------------------------------------------------|
| Criminal and background checks     | South African Police Services                                                           |
| Qualification Verifications        | South African Qualifications Authority                                                  |
| Credit Checks and Information      | Credit Bureaus                                                                          |
| Bond affordability calculations    | Ooba                                                                                    |

### 8.4. General description of Information Security Measures to be implemented by the responsible party to ensure the confidentiality, integrity and availability of the information

1. Data Encryption and Firewalls.
2. Anti-Virus and Anti-Malware software.
3. On-Premises Physical Access control.
4. Unique Usernames, Complex Passwords and Multi-Factor Authentication (where available) required for access to CRM and internal systems.

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## 9. AVAILABILITY OF THE MANUAL

- 9.1. A copy of the Manual is available:
    - 9.1.1. On the website – (INSERT SPECIFIC LOCAL PLATINUM URL, e.g., [harcourts.co.za](http://harcourts.co.za));
    - 9.1.2. At The Company for public inspection during normal business hours;
    - 9.1.3. To any person upon request and upon the payment of a R100.00 'Request Fee' as required; and
    - 9.1.4. From the Information Regulator upon request.
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## 10. UPDATING OF THE MANUAL

The Information Officer of David Miller and Associates (Pty) Ltd will update this manual as and when required.

Issued by:



Stephen Caradoc-Davies  
Information Officer

2026/06/17

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