

PAIA MANUAL

Prepared in terms of Section 51 of the Promotion of Access to Information Act,

2 of 2000

Paciraft (Pty) Ltd Trading as Live Real Estate

Item	Details
Document	PAIA Manual
Company	Paciraft (Pty) Ltd t/a Live Real Estate
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1. INTRODUCTION AND PURPOSE

This Manual is compiled in accordance with section 51 of the Promotion of Access to Information Act, 2 of 2000 (PAIA) and recognises the obligations imposed by the Protection of Personal Information Act, 4 of 2013 (POPIA). It explains the categories of records held by Paciraft (Pty) Ltd trading as Live Real Estate and the procedures to request access to those records.

2. DEFINITIONS AND ABBREVIATIONS

Term	Meaning
PAIA	Promotion of Access to Information Act, 2 of 2000
POPIA	Protection of Personal Information Act, 4 of 2013
PPRA	Property Practitioners Regulatory Authority
Information Officer	Head of the private body responsible for PAIA and POPIA compliance
Data Subject	Natural or juristic person to whom personal information relates

3. COMPANY DETAILS

Registered Company	Pacicraft (Pty) Ltd
Trading Name	Live Real Estate
Address	339 Main Road, Sea Point, Cape Town
Telephone	+27 21 439 3903
Email	live@liverealestate.co.za
Website	www.liverealestate.co.za
Business	Real estate sales and rentals

4. INFORMATION OFFICER DETAILS

Information Officer: Brendan Miller

Email: live@liverealestate.co.za

Telephone: +27 21 439 3903

Business Address: 339 Main Road, Sea Point, Cape Town

5. INFORMATION REGULATOR GUIDE

Guide on How to Use PAIA

In terms of section 10 of the Promotion of Access to Information Act, 2 of 2000 ("PAIA"), the Information Regulator has published a guide explaining:

- the objectives of PAIA;
- how to submit a request for access to records;
- how to complete the prescribed request forms;
- the remedies available where access is refused;
- the fees payable (where applicable);
- the rights of requesters and third parties;
- the role of the Information Regulator; and
- the interaction between PAIA and the Protection of Personal Information Act, 4 of 2013 ("POPIA").

The Guide is available free of charge from the Information Regulator.

Information Regulator Contact Details

Physical Address

JD House
27 Stiemens Street
Braamfontein
Johannesburg
2001

Postal Address

P.O. Box 31533
Braamfontein
Johannesburg
2017

General Enquiries

Email: enquiries@inforegulator.org.za

Website: www.inforegulator.org.za

6. APPLICABLE LEGISLATION

Paciraft (Pty) Ltd trading as Live Real Estate maintains records in accordance with applicable South African legislation. This list is not exhaustive and may be updated from time to time.

7. RECORDS AUTOMATICALLY AVAILABLE

The following records are generally available without the need to submit a formal PAIA request, subject to reasonable administrative procedures and any applicable confidentiality restrictions.

Corporate Information, Property Information, Employment Information, Public Information.

The Company reserves the right to determine whether a record is publicly available and whether a formal PAIA request remains necessary.

8. CATEGORIES OF RECORDS HELD

The Company maintains records, access to these records will be granted only in accordance with PAIA, POPIA and any other applicable legislation.

Records held: Corporate, Property Sales, Rental and Leasing, Buyer and Seller, Landlord and Tenant, Financial, FICA Compliance, PPRA Compliance, Human Resources, Marketing, Legal Records

Archived Records: Records no longer required for active business purposes may be archived in accordance with the Company's Record Retention Policy and applicable legislation. Archived records remain subject to PAIA and POPIA where applicable.

9. PROPERTY PRACTITIONERS REGULATORY AUTHORITY (PPRA) SPECIFIC RECORDS

As a registered Property Practitioner in terms of the **Property Practitioners Act, 22 of 2019**, Live Real Estate maintains various records to ensure compliance with legislative and regulatory obligations imposed by the Property Practitioners Regulatory Authority ("PPRA").

These records are maintained in electronic and/or hard copy format and access thereto will be granted only in accordance with PAIA, POPIA and any other applicable legislation:

Regulatory Compliance Records, Property Transaction Record, Rental Records, FICA Compliance Records, Trust Account Records.

10. PAIA REQUEST PROCEDURE

A requester wishing to obtain access to records held by the Company shall submit a request in accordance with the Promotion of Access to Information Act.

The prescribed PAIA Request Form must be completed in sufficient detail to enable the Company to:

- identify the requested record;
- identify the requester;
- determine the form of access requested;
- communicate with the requester;
- determine whether any third parties should be notified.

Requests should be submitted to the Information Officer.

Contents of the Request

A request should include:

- Full name
- Identity Number or Company Registration Number
- Postal Address
- Physical Address
- Email Address
- Contact Number
- Description of the requested record
- Reason for the request (where required)
- Preferred method of access
- Proof of authority where acting on behalf of another person

Timeframes

The Company shall process requests within the period prescribed by PAIA.

Where permitted by law, this period may be extended.

11. APPLICABLE FEES

The Company applies the fees prescribed under PAIA.

Where a request requires substantial searching or preparation, a deposit may be requested before processing continues.

Current fees shall be those prescribed by the Regulations issued under PAIA.

The Company reserves the right to amend applicable fees should the Regulations be amended.

12. GROUNDS FOR REFUSAL OF ACCESS

Access to records may be refused where permitted by PAIA.

13. PROCESSING OF PERSONAL INFORMATION (POPIA)

Live Real Estate recognises the constitutional right to privacy and is committed to processing personal information responsibly, lawfully and securely.

14. CATEGORIES OF DATA SUBJECTS

The Company processes information relating to the following categories of Data Subjects:

Clients

- Buyers
- Sellers
- Landlords
- Tenants

Employees

Including:

- Permanent employees
- Temporary employees
- Independent contractors
- Consultants

Suppliers

Companies and individuals supplying goods or services.

Service Providers

Including:

- Conveyancers
- Mortgage Originators
- Photographers
- Contractors
- Inspectors
- Marketing Agencies
- IT Service Providers

Regulatory Authorities

Information exchanged with:

- PPRA
- FIC
- SARS
- CIPC
- Municipalities
- Deeds Office
- Courts

where required by law.

15. CATEGORIES OF PERSONAL INFORMATION

The Company may process the following categories of Personal Information:

Identity Information

- Full names
- Identity Numbers
- Passport Numbers
- Company Registration Numbers
- Date of Birth

Contact Information

- Residential Address
- Postal Address
- Email Address
- Telephone Numbers

Financial Information

- Banking Details
- Income Information
- Salary Information
- Credit Information
- Bond Information
- Deposit Records
- Commission Records

Property Information

- Property Ownership
- Property Addresses
- Title Deeds
- Property Valuations
- Sale History
- Rental History

Employment Information

- Employer Details
- Occupation
- Employment Contracts
- Salary Information

Verification Information

- Proof of Address
- Identity Documents
- Company Documents
- Trust Documentation
- Beneficial Ownership Information

Electronic Information

- Website Usage Data
- IP Addresses
- Cookies
- Email Communications
- Electronic Correspondence

Marketing Information

- Marketing Preferences
- Newsletter Subscriptions
- Communication Preferences
- Website Enquiries

16. PROCESSING OF SPECIAL PERSONAL INFORMATION AND INFORMATION CHILDREN

Live Real Estate does not knowingly collect children's personal information except where legally required.

The Company does not intentionally process Special Personal Information, unless:

- required by law;
- necessary for employment obligations;
- required for legal proceedings; or
- otherwise authorised under POPIA.

16. LAWFUL BASIS AND PURPOSES FOR PROCESSING PERSONAL INFORMATION

Live Real Estate processes personal information only where there is a lawful basis to do so in terms of POPIA.

Personal information is processed for one or more of the following purposes:

- To market and sell fixed property.
- To facilitate rental transactions.
- To communicate with buyers, sellers, landlords and tenants.
- To comply with the Property Practitioners Act and PPRA requirements.
- To comply with the Financial Intelligence Centre Act (FICA).
- To administer contracts and property transactions.
- To manage employment relationships.
- To maintain financial and accounting records.
- To comply with legal and regulatory obligations.
- To protect the legitimate interests of the Company and its clients.
- To provide customer support and respond to enquiries.
- To send marketing communications.

17. RECIPIENTS OF PERSONAL INFORMATION

Personal information may be shared where necessary with:

- Employees of the Company.
- Property Practitioners and authorised representatives.
- Buyers, sellers, landlords and tenants involved in a transaction.
- Conveyancing attorneys.
- Mortgage originators and financial institutions.
- Credit bureaux (where authorised by law).
- Service providers acting on behalf of the Company.
- Regulatory authorities, including the PPRA, Information Regulator, FIC and SARS.
- Courts, law enforcement agencies or other public authorities where disclosure is required by law.

The Company will not disclose personal information to third parties unless authorised by law, required to fulfil contractual obligations, or with the consent of the data subject.

18. CROSS-BORDER TRANSFERS OF PERSONAL INFORMATION

The Company primarily stores and processes personal information within the Republic of South Africa. Where personal information is transferred outside South Africa, such transfer will only occur where:

- the recipient is subject to laws providing an adequate level of protection;
- the data subject has consented to the transfer;
- the transfer is necessary for the performance of a contract; or
- the transfer is otherwise permitted under POPIA.

19. COOKIES AND WEBSITE DATA

The Company's website may make use of cookies and similar technologies to improve functionality, enhance the user experience and analyse website usage.

Users may disable cookies through their internet browser settings, although certain website functionality may be affected.

20. SECURITY SAFEGUARDS

Live Real Estate has implemented reasonable technical and organisational measures to protect personal information against unauthorised access, loss, misuse, alteration or destruction.

These measures include:

- Secure electronic systems.
- Password protected devices and user accounts.
- Controlled access to records.
- Secure storage of physical files.
- Anti-virus and malware protection.
- Firewall and network security measures.
- Confidentiality obligations for employees.
- Regular data backups.
- Secure destruction of confidential records when no longer required.

Security measures are reviewed periodically to ensure continued effectiveness.

21. RETENTION AND DESTRUCTION OF RECORDS

Records are retained for as long as necessary to fulfil the purpose for which they were collected, to comply with legal obligations, or to protect the legitimate interests of the Company.

Once records are no longer required, they will be securely destroyed or permanently deleted.

22. COMPLAINTS PROCEDURE

Any person who believes that their rights under PAIA or POPIA have been infringed may first contact the Information Officer to attempt to resolve the matter.

23. AVAILABILITY OF THIS MANUAL

This Manual is available:

- At the Company's principal place of business.
- On the Company's website: www.liverealestate.co.za
- Upon request from the Information Officer.
- As required by the Promotion of Access to Information Act.

The Manual will be reviewed and updated to reflect changes when necessary.