

## PAIA MANUAL

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

Ballito.net (Pty) Ltd

Date of Compilation: 27 June 2026

*(Version 1.0)*

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**Document Control**

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<b>Version</b>	1.0
<b>Effective Date</b>	27 June 2026
<b>Next Review Date</b>	June 2027 (or earlier if legislation changes)
<b>Approved By</b>	Alicia Anne Kember
<b>Position</b>	Director & Information Officer

## 1. LIST OF ACRONYMS AND ABBREVIATIONS

<b>Acronym</b>	<b>Description</b>
CEO	Chief Executive Officer
DIO	Deputy Information Officer
IO	Information Officer
Minister	Minister of Justice and Constitutional Development
PAIA	Promotion of Access to Information Act 2 of 2000 (as amended)
POPIA	Protection of Personal Information Act 4 of 2013
Regulator	Information Regulator (South Africa)
Republic	Republic of South Africa
PPRA	Property Practitioners Regulatory Authority
PPA	Property Practitioners Act 22 of 2019
FICA	Financial Intelligence Centre Act 38 of 2001

## **2. PURPOSE OF THE PAIA MANUAL**

This Manual has been prepared in accordance with section 51 of the Promotion of Access to Information Act 2 of 2000 ("PAIA"). Its purpose is to:

- 2.1 Inform members of the public of the categories of records held by Ballito.net (Pty) Ltd that are available without the need to submit a formal PAIA request.  
Explain how to request access to records held by Ballito.net (Pty) Ltd in accordance with PAIA.
- 2.2 Describe the categories of records maintained by Ballito.net (Pty) Ltd and the legislation under which certain records are available.
- 2.3 Provide the contact details of the Information Officer responsible for receiving and processing requests for access to information.
- 2.4 Explain how to obtain the Information Regulator's Guide on the use of PAIA.
- 2.5 Describe the manner in which Ballito.net (Pty) Ltd processes personal information in accordance with the Protection of Personal Information Act 4 of 2013 ("POPIA").
- 2.6 Describe the categories of data subjects and the types of personal information processed by Ballito.net (Pty) Ltd.
- 2.7 Identify the categories of recipients to whom personal information may be disclosed where authorised or required by law.
- 2.8 Indicate whether personal information is transferred outside the Republic of South Africa.
- 2.9 Describe the general security measures implemented by Ballito.net (Pty) Ltd to protect the confidentiality, integrity and availability of personal information.

### 3. KEY CONTACT DETAILS FOR ACCESS TO INFORMATION

#### 3.1 Information Officer

Name: Alicia Anne Kember  
Position: Director and Information Officer  
Telephone: 032 946 1678  
Email: [alicia@ballito.net](mailto:alicia@ballito.net)

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#### 3.2 Deputy Information Officer

Ballito.net (Pty) Ltd has not designated a Deputy Information Officer.

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#### 3.3 General Requests for Access to Information

Email: [alicia@ballito.net](mailto:alicia@ballito.net)  
Telephone: 032 946 1678

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#### 3.4 Head Office

<b>Company Name:</b>	Ballito.net (Pty) Ltd
<b>Physical Address:</b>	42 Cussonia Way Simbithi Eco Estate Shakas Rock Ballito 4399
<b>Postal Address:</b>	Postnet Suite 20 Private Bag X0001 Ballito 4420
<b>Telephone:</b>	032 946 1678
<b>Email:</b>	<a href="mailto:alicia@ballito.net">alicia@ballito.net</a>
<b>Website:</b>	<a href="http://www.ballito.net">www.ballito.net</a>

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#### 4. GUIDE ON HOW TO USE PAIA AND HOW TO OBTAIN ACCESS TO THE GUIDE

- 4.1 The Information Regulator has, in terms of section 10(1) of PAIA, compiled and made available a revised Guide on how to use PAIA ("the Guide"). The Guide is intended to assist any person who wishes to exercise any right contemplated in PAIA or POPIA.
- 4.2 The Guide is available in each of the official languages and in Braille.
- 4.3 The Guide contains information regarding:
- the objects of PAIA and POPIA;
  - the contact details of the Information Officers and Deputy Information Officers of public bodies and private bodies where applicable;
  - the manner and form of requesting access to records held by public and private bodies;
  - the assistance available from the Information Officer of a public body;
  - the assistance available from the Information Regulator;
  - the remedies available in law where access to records is refused;
  - the provisions requiring public and private bodies to compile PAIA Manuals;
  - the categories of records that may be made available automatically;
  - the applicable request fees; and
  - the Regulations issued under PAIA.
- 4.4 The Guide may be inspected during normal office hours at the offices of the Information Regulator.
- 4.5 The Guide may also be obtained:
- upon request from the Information Officer of Ballito.net (Pty) Ltd; or
  - from the Information Regulator's website at [www.justice.gov.za/inforeg/](http://www.justice.gov.za/inforeg/)
- 4.6 Copies of the Guide are available in English and Afrikaans for public inspection during normal business hours.

**5. CATEGORIES OF RECORDS OF BALLITO.NET (PTY) LTD WHICH ARE AVAILABLE WITHOUT A PERSON HAVING TO REQUEST ACCESS**

The following categories of records are generally available without the need to submit a formal request in terms of the Promotion of Access to Information Act 2 of 2000 ("PAIA"). Access may be obtained via the Ballito.net website or upon request, subject to availability.

<b>Category of Record</b>	<b>Available on Website</b>	<b>Available Upon Request</b>
Company information and services offered	✓	✓
Residential property listings for sale and long-term rental	✓	✓
Holiday accommodation listings	✓	✓
Contact details and office information	✓	✓
PAIA Manual	✓	✓
Privacy Policy	✓	✓
Website Terms and Conditions	✓	✓
Request Information (POPIA Data Subject Request)	✓	✓
Property marketing brochures and promotional material	✓	✓
General information relating to Ballito.net's property sales, rentals, holiday letting and property management services	✓	✓

The above records are made available voluntarily and do not contain confidential, commercially sensitive or personal information protected by PAIA, POPIA or any other applicable legislation. Requests for access to records not listed above must be submitted in accordance with the provisions of PAIA.

**6. DESCRIPTION OF THE RECORDS OF BALLITO.NET (PTY) LTD WHICH ARE AVAILABLE IN ACCORDANCE WITH OTHER LEGISLATION**

In addition to records available under PAIA, Ballito.net (Pty) Ltd maintains records in accordance with applicable South African legislation, including but not limited to the following:

<b>Category of Records</b>	<b>Applicable Legislation</b>
Company incorporation documents, statutory registers and corporate records	Companies Act 71 of 2008
PAIA Manual	Promotion of Access to Information Act 2 of 2000
Records containing personal information	Protection of Personal Information Act 4 of 2013
Property practitioner records, trust account records and compliance documentation	Property Practitioners Act 22 of 2019
Financial Intelligence Centre (FICA) records and client due diligence documentation	Financial Intelligence Centre Act 38 of 2001
Accounting records, financial statements and taxation records	Income Tax Act 58 of 1962, Value-Added Tax Act 89 of 1991 and Tax Administration Act 28 of 2011
Employment records	Basic Conditions of Employment Act 75 of 1997, Labour Relations Act 66 of 1995 and Employment Equity Act 55 of 1998
Occupational health and safety records	Occupational Health and Safety Act 85 of 1993
Compensation records	Compensation for Occupational Injuries and Diseases Act 130 of 1993
Electronic communications and electronic records	Electronic Communications and Transactions Act 25 of 2002

Access to the above records is subject to the provisions of the applicable legislation, the Promotion of Access to Information Act and any lawful grounds for refusal of access.

**7. DESCRIPTION OF THE SUBJECTS ON WHICH BALLITO.NET (PTY) LTD HOLDS RECORDS AND THE CATEGORIES OF RECORDS HELD**

<b>Subject</b>	<b>Categories of Records</b>
<b>Corporate Records</b>	Certificate of Incorporation, Memorandum of Incorporation (MOI), statutory records, shareholder and director records, company policies and procedures.
<b>Governance and Compliance</b>	PAIA Manual, POPIA documentation, compliance registers, Information Officer records, PPRA compliance records, FICA compliance records, internal policies and procedures.
<b>Financial Records</b>	Accounting records, annual financial statements, tax records, VAT records, bank statements, trust account records, invoices, receipts and payment records.
<b>Human Resources</b>	Employment contracts, employee records, payroll records, leave records, disciplinary records, performance records, training records and statutory employment documentation.
<b>Sales and Property Records</b>	Sole and open mandates, sale agreements, property information, valuation records, marketing records, photographs, correspondence and transaction files.
<b>Residential Letting Records</b>	Lease agreements, applications, tenant screening records, inspection reports, maintenance records, deposits, rental payment records and correspondence.
<b>Holiday Letting Records</b>	Booking records, guest information, reservation records, inspection reports, inventory records, maintenance records, payment records and correspondence.
<b>Property Management Records</b>	Management agreements, maintenance records, contractor records, owner instructions, quotations, invoices and inspection reports.
<b>Client Records</b>	Client identification documents, FICA records, contact details, correspondence, mandates, banking details and transaction records.
<b>Supplier and Contractor Records</b>	Service agreements, contractor information, quotations, invoices, banking details and correspondence.
<b>Information Technology Records</b>	Website records, electronic correspondence, system records, electronic documents, backups and access logs.

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**Marketing Records** Advertising material, brochures, website content, social media content, newsletters and promotional material.

**Legal Records** Contracts, legal opinions, litigation records, insurance records, claims, notices and regulatory correspondence.

The above categories are not exhaustive and may be supplemented by any other records created or received by Ballito.net (Pty) Ltd in the ordinary course of conducting its business.

## 8. PROCESSING OF PERSONAL INFORMATION

### 8.1 Purpose of Processing Personal Information

Ballito.net (Pty) Ltd processes personal information only where it has a lawful basis to do so and for purposes including, but not limited to, the following:

- verifying the identity of clients, tenants, purchasers, landlords, sellers, employees, contractors and service providers in accordance with the Financial Intelligence Centre Act 38 of 2001 (FICA);
- facilitating the sale, purchase, letting, holiday letting and management of residential property;
- complying with the Property Practitioners Act 22 of 2019 and the requirements of the Property Practitioners Regulatory Authority (PPRA);
- administering trust account and financial records as required by law;
- communicating with clients, contractors, service providers, attorneys, financial institutions and other parties involved in property transactions;
- managing maintenance, inspections, bookings and other property-related services;
- complying with legal, regulatory and contractual obligations, including PAIA and POPIA;
- administering employment and human resource matters;
- maintaining business records and internal administration; and
- protecting the legitimate interests of Ballito.net (Pty) Ltd, its clients and other data subjects where permitted by law.

## 8.2 Description of the Categories of Data Subjects and the Personal Information Processed

Categories of Data Subjects	Categories of Personal Information Processed
<b>Property Owners, Sellers and Landlords</b>	Full names, identity or registration numbers, contact details, physical and postal addresses, email addresses, banking details, FICA documentation, property ownership information, tax information (where applicable), and transaction records.
<b>Purchasers, Tenants and Prospective Tenants</b>	Full names, identity or passport numbers, contact details, employment information, income and affordability information, banking details, credit information, FICA documentation, references, lease or sale transaction records and correspondence.
<b>Holiday Guests</b>	Full names, identity or passport numbers, contact details, reservation information, payment information and correspondence.
<b>Employees and Employment Applicants</b>	Full names, identity numbers, contact details, residential addresses, qualifications, employment history, payroll information, banking details, tax numbers, leave records, disciplinary records and other employment-related information.
<b>Directors and Shareholders</b>	Identity information, contact details, statutory records and company-related information required by law.
<b>Service Providers and Contractors</b>	Company or trading names, registration numbers, VAT numbers, contact details, banking details, service agreements, compliance documentation and correspondence.
<b>Professional Advisers</b> (including attorneys, conveyancers, auditors and bond originators)	Contact details, professional registration information, business details, banking details and correspondence relating to property transactions or professional services.
<b>Website Users and Enquirers</b>	Names, contact details, property enquiry information, website enquiry forms and electronic correspondence submitted through the Ballito.net website.

### 8.3 Recipients or Categories of Recipients to Whom Personal Information May Be Supplied

Ballito.net (Pty) Ltd may disclose personal information where required or permitted by law, where necessary to perform its contractual obligations, or with the consent of the data subject.

#### Category of Personal Information Recipients or Categories of Recipients

<b>Identity and FICA documentation</b>	Financial Intelligence Centre (FIC), verification service providers and other parties where required by law
<b>Personal and contact information</b>	Sellers, landlords, purchasers, tenants, property owners and authorised representatives where necessary to facilitate property transactions
<b>Property transaction information</b>	Conveyancing attorneys, transferring attorneys, bond attorneys, bond originators and financial institutions
<b>Financial and banking information</b>	Financial institutions, payment service providers, accountants and auditors where required for legitimate business purposes
<b>Credit and affordability information</b>	Credit bureaux, credit assessment providers, landlords and property owners (where applicable and legally permissible)
<b>Property management and maintenance information</b>	Approved contractors, maintenance service providers, managing agents and insurers where required to provide property-related services
<b>Employee information</b>	South African Revenue Service (SARS), payroll providers, employee benefit administrators, the Department of Employment and Labour and other statutory authorities
<b>Qualifications and employment verification information</b>	South African Qualifications Authority (SAQA), previous employers, reference providers and verification agencies
<b>Regulatory and compliance information</b>	Property Practitioners Regulatory Authority (PPRA), Information Regulator, courts, regulatory authorities and law enforcement agencies where required by law
<b>Electronic communications and website enquiries</b>	Authorised information technology service providers, website hosting providers and communication service providers acting on behalf of Ballito.net (Pty) Ltd

#### 8.4 Planned Transborder Flows of Personal Information

Ballito.net (Pty) Ltd does not intentionally transfer or store personal information outside the Republic of South Africa as part of its ordinary business operations.

However, certain authorised third-party service providers, including cloud-based software, email, website hosting or data backup providers, may process or store limited personal information on servers located outside South Africa.

Where personal information is transferred across the borders of the Republic, Ballito.net (Pty) Ltd will ensure that such transfer is carried out in accordance with section 72 of the Protection of Personal Information Act 4 of 2013 (POPIA) and that appropriate safeguards are in place to protect the personal information.

### 8.5 General Description of Information Security Measures

Ballito.net (Pty) Ltd implements reasonable technical and organisational measures to safeguard personal information against loss, unauthorised access, disclosure, alteration or destruction.

These measures include, where appropriate:

- restricting access to personal information to authorised personnel on a need-to-know basis;
- password protection and user authentication for business systems and electronic devices;
- the use of anti-virus, anti-malware and other appropriate security software;
- secure storage of physical records containing personal information;
- secure disposal of records through shredding or permanent deletion when no longer required and where retention periods have expired;
- regular data backups and appropriate recovery measures;
- the use of secure electronic communication and reputable service providers where appropriate;
- staff awareness of confidentiality obligations and the responsible handling of personal information; and
- periodic review of internal procedures and security practices to promote ongoing compliance with applicable data protection legislation.

Ballito.net (Pty) Ltd continually reviews and improves its information security practices to address evolving legal, operational and cybersecurity risks.

## 9. AVAILABILITY OF THE MANUAL

9.1 This Manual is available:

9.1.1 on the Ballito.net (Pty) Ltd website at [www.ballito.net](http://www.ballito.net);

9.1.2 for inspection at the offices of Ballito.net (Pty) Ltd during normal business hours;

9.1.3 upon written request to the Information Officer, subject to any prescribed fee payable in terms of PAIA and the applicable Regulations; and

9.1.4 upon request to the Information Regulator.

9.2 Any applicable fees payable for copies of this Manual or for access to records will be determined in accordance with PAIA and the Regulations issued thereunder.

## 10. UPDATING OF THE MANUAL

Ballito.net (Pty) Ltd will review this Manual periodically and update it whenever necessary to reflect changes in applicable legislation, regulatory requirements, business operations or record-keeping practices.

The latest version of this Manual will be made available on the Ballito.net (Pty) Ltd website and may also be obtained from the Information Officer upon request.

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Issued by:



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**Alicia Anne Kember**

Director and Information Officer  
Ballito.net (Pty) Ltd

**Date of Compilation:** 27 June 2026