PAIA MANUAL

GUY GILLESPIE PROPERTIES (PTY) LTD

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

Original compilation: 1 June 2023 | Updated: 26 November 2026

This manual describes records held by Guy Gillespie Properties (Pty) Ltd (GGP), how access may be requested, and its processing of personal information. It should be read with GGP's POPIA Privacy Policy.

1. Acronyms and abbreviations

PAIA — Promotion of Access to Information Act; POPIA — Protection of Personal Information Act; IO — Information Officer; FICA — Financial Intelligence Centre Act; FIC — Financial Intelligence Centre; GGP — Guy Gillespie Properties (Pty) Ltd.

2. Purpose of this manual

This manual helps the public identify records held by GGP; understand the access request process; identify records available without a formal request and under other legislation; obtain the Information Regulator's PAIA Guide; and understand the processing, disclosure, cross-border transfer and safeguarding of personal information.

3. Key contact details

Item	Details
Responsible private body	Guy Gillespie Properties (Pty) Ltd
Registration number	2014/037099/07
Information Officer	Guy Gillespie, Principal Director
Deputy Information Officer	None designated
Telephone	083 740 3619
Email	guy@ggproperties.co.za
Physical address	19 Empire Avenue, Hout Bay, Cape Town, Western Cape, South Africa
Postal address	19 Empire Avenue, Hout Bay, Cape Town, Western Cape, South Africa
Website	www.ggproperties.co.za

4. PAIA Guide and requesting access

The Information Regulator publishes a Guide on how to use PAIA, including the rights of requesters, applicable forms, fees and remedies. The Guide can be obtained from the Information Regulator or requested from GGP's Information Officer. Information Regulator website: www.inforegulator.org.za.

To request a record, contact the Information Officer using the prescribed PAIA request form for a private body (Form 2 under the PAIA Regulations), identifying the record, preferred form of access, contact details, and the right the record is required to exercise or protect. GGP will consider the request under PAIA, including applicable grounds for refusal and prescribed timelines. Any fees charged will be those permitted by the regulations in force at the time of the request. A requester dissatisfied with a decision may use the remedies provided by PAIA, including a complaint to the Information Regulator or an application to court, as applicable.

5. Records available without a formal PAIA request

Category	Method of access
Public property listings and published marketing material	GGP website and public marketing channels
GGP POPIA Privacy Policy	Website or request to Information Officer
GGP PAIA Manual	Website once published; otherwise request to Information Officer
General company contact details	Website or request to Information Officer

This list does not make confidential client, employee, financial or transaction records publicly available.

6. Records maintained under other legislation

Legislation	Examples of records (where applicable)
Companies Act 71 of 2008	Company registration and corporate governance records
Financial Intelligence Centre Act 38 of 2001	Client due diligence, verification, risk and transaction-related compliance records
Property Practitioners Act 22 of 2019	Property practitioner registration, mandates and related compliance records
Protection of Personal Information Act 4 of 2013	Privacy notices, personal information handling and security records
Promotion of Access to Information Act 2 of 2000	PAIA Manual and access request records
Income Tax Act 58 of 1962 and Tax Administration Act 28 of 2011	Accounting, tax and supporting financial records
Employment and labour legislation (where applicable)	Employment, remuneration and personnel records

Records are subject to the relevant legislation and any lawful grounds for withholding access.

7. Subjects and categories of records

Subject	Examples of records held
Property sales	Mandates, listings, offers to purchase, seller and buyer communications, transaction and conveyancing correspondence
Property rentals and management	Rental mandates, applications, screening results, leases, rental statements, deposits, arrears and inspections
FICA and regulatory compliance	Identity and address verification, client risk assessments, beneficial ownership, sanctions/PEP checks and compliance correspondence
Finance and accounting	Invoices, payments, banking and trust account records, tax and accounting documents
Company and operations	Registration, insurance, policies, service agreements and business correspondence
Personnel and property practitioners	Agent agreements, remuneration, registration and related records
Website and enquiries	Property enquiries, contact details and communications

8. Processing of personal information

8.1 Purposes of processing

GGP processes personal information to market and sell properties; receive and assess rental applications; perform tenant screening, credit and affordability checks; prepare and administer leases; manage rent, deposits and arrears; perform FICA due diligence and other regulatory checks; communicate with clients; and conduct lawful administration, accounting and marketing.

8.2 Categories of data subjects and information

Data subjects	Types of information
Buyers, sellers and prospective clients	Names, contact and identity details, property and transaction information, FICA documentation
Landlords, tenants and rental applicants	Contact and identity details, employment and income information, bank statements, payslips, credit/affordability and lease information
Company, trust and other juristic clients	Registration and contact details, authorised representatives, directors, trustees, beneficial ownership and FICA information
Agents, employees and contractors	Contact details, contracts, remuneration, professional registration and business records
Service providers and website visitors	Contact, billing and enquiry information; technical website data where collected

Information may be obtained directly from individuals or, where lawful, from TPN and other screening providers, landlords, sellers, employers, conveyancers and other estate agencies.

8.3 Recipients of personal information

Where necessary and lawful, GGP may disclose relevant information to landlords, sellers, buyers, tenants, conveyancing attorneys, other property practitioners, TPN, credit bureaus and verification providers, financial institutions, accountants, auditors, technology and cloud service providers, and competent regulators including the FIC. Disclosures are limited to the relevant purpose and legal requirements.

8.4 Cross-border processing

GGP uses Dropbox to store electronic client, FICA and property transaction records. Dropbox may store or process personal information outside South Africa. The specific countries of processing depend on Dropbox's service arrangements and have not been independently confirmed in this manual. GGP must ensure that any international transfer meets the requirements of section 72 of POPIA, including applicable contractual or other lawful safeguards.

8.5 Information security measures

GGP owns and controls the master Dropbox folders containing client, FICA and property transaction records. Authorised property practitioners use their own paid Dropbox accounts to upload and manage documents in designated GGP-owned folders. Access permissions prevent agents from accessing one another's confidential folders. The Principal Director and authorised administrative personnel have access as required for operational management and compliance oversight. Computers and Dropbox accounts used to access these records are password-protected, and two-factor authentication is enabled for GGP and authorised agents. When an agent leaves GGP, their access to GGP folders is revoked promptly, while the agency retains its client and FICA records. GGP takes reasonable technical and organisational measures to protect records against loss, misuse, unauthorised access, disclosure, alteration or destruction.

9. Availability of this manual

A copy may be requested from the Information Officer by email at guy@ggproperties.co.za and may be inspected at the business address by prior arrangement during normal business hours. The current manual is available on the GGP website at www.ggproperties.co.za. Any permitted reproduction or access fees will be determined under the applicable PAIA Regulations.

10. Updates and approval

GGP will review this manual when business operations, contact details or legal requirements materially change.

Issued by: Guy Gillespie, Principal Director

Signature: GB Gillespie Date: 26 November 2026