

Promotion of Access to Information Act ("PAIA") Manual

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Promotion of Access to Information Act (“PAIA”) Manual

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1. INTRODUCTION & PURPOSE

The Promotion of Access to Information Act, 2000 (“PAIA”) was enacted in order to give effect to Section 32 of the Constitution, which provides that everyone has the right to access Data held by the State, as well as Data held by another person, when such privately held Data is required to exercise a person’s right or to protect a person’s right, provided that the requester complies with certain procedural requirements. PAIA further sets out the grounds upon which such access can be refused.

Section 23 of The Protection of Personal Information Act 4 of 2013 (“PoPIA”) further provides a Data Subject the right to access Personal Information (“PI”), Special Personal Information (“SPI”) and Children’s Information (herein collectively referred to as “Information”) held by a Responsible Party.

CBRE Excellerate and its Subsidiaries (hereafter also referred to as “CBRE Excellerate”) would fall within the definition of a Private Body in terms of PAIA as well as a Responsible Party in terms of PoPIA. This PAIA Manual details the types/categories of Data that CBRE Excellerate holds and the process that needs to be followed to request access to such records.

2. REFERENCES / AMENDMENTS

Amendments to or a review of this PAIA Manual will take place on an ad hoc basis or as dictated by operational requirements, and at intervals as may be deemed necessary.

Requester/s are advised to access CBRE Excellerate website (<https://www.cbreexcellerate.com/>) periodically to inform themselves of any changes.

3. TERMS, ABBREVIATIONS & EDITIONS

“Biometric Information” is information resulting from specific technical processing relating to the physical, physiological, or behavioural characteristics of a natural person, which allow or confirm the unique identification of that natural person, such as facial images or dactyloscopy data.

“Chief Information Officer” means the registered Information Officer within CBRE Excellerate (Pty) Limited.

“Children’s Information” is PI or SPI relating to a natural person under the age of 18 years who is not legally competent, without the assistance of a competent person, to take any action or decision in respect of any matter concerning him- or herself.

“Consent” means the voluntary, specific, and informed expression of will in terms of which permission is given for the processing of Information.Content

“Data” means all types of information that is used by CBRE Excellerate. CBRE Excellerate has the following four (4) levels of information (which is collectively referred to as “Data”):

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- Highly sensitive information;
- Sensitive information;
- Private and confidential information (which is collectively referred to as "Information"); and
- Public information.

"Data Subject/s" means the person (e.g. staff, clients, contractors) to whom the Information relates to. (e.g. natural person or juristic person/legal entity, whose Information is being processed by CBRE Excellerate on behalf of its staff, clients, contractor and/or on CBRE Excellerate's behalf by third parties and Operators such as service providers or contractors.)

"Deputy Information Officer" is an individual in CBRE Excellerate to whom the Chief Information Officer and/or Entity Information Officer has delegated some of their powers and duties in terms of PoPIA.

"Entity Information Officer" means the registered Information Officer for each of the Subsidiaries within CBRE Excellerate.

"Information Assets" means all Systems, Electronic Devices, and Information in whichever form (electronic, audible, hard copy or physical) which CBRE Excellerate owns or is responsible for, including CBRE Excellerate Information, Data Subject Information and Third-Party Information.

"Information" is a collective term used for PI, SPI, and Children's Information.

"Information Officer" means a person or persons acting on behalf of CBRE Excellerate and who is responsible for discharging the duties and responsibilities assigned to the "head" of CBRE Excellerate as prescribed in terms of PoPIA.

"Information Regulator" is a South African body which is empowered to monitor and enforce compliance by private bodies in terms of PoPIA.

"Operator" is a person who Processes Information for a Responsible Party in terms of a contract or mandate, without coming under the direct authority of that party.

"Personal Information ("PI")" means the PI of a living natural person / individual, or an existing legal entity / juristic person. Examples include the following information:

- Race;
- Gender;
- Sex;
- Pregnancy;
- marital status;
- Nationality;
- Ethnicity;
- Registration number, address of a juristic person;
- Education, medical, financial, criminal or employment history;
- any identifying number, symbol, e-mail address, physical address, telephone number, etc.).

"Process / Processed / Processing" means any operation or activity or any set of operations, whether by automatic means or not, concerning Information, including but not limited to:

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- the collection, receipt, recording, organisation, collation, storage, updating or modification, retrieval, alteration, consultation, or use;
- dissemination by means of transmission, distribution or making available in any other form; or
- merging, linking, as well as restriction, degradation, erasure, or destruction of information.

"Requester" means any person making a request to access a record that is under the control of CBRE Excellerate. There are two types of requesters which is detailed below:

- Personal Requester - means a requester/Data Subject who is seeking to access a record containing Information about themselves; and
- Other Requester/Third Party - means any natural or juristic person, other than the requestor, or such party acting on behalf of the requester, or CBRE Excellerate itself.

"Record" means any recorded information, regardless of form or medium. Examples include the following:

- Writing on any material;
- Information produced;
- recorded or stored by means of book, map, plan, graph, or drawing; or
- photograph, film, negative, tape or other device in which one or more visual images;

Which are in the possession or under the control of a Responsible Party; whether it was created by a Responsible Party; and regardless of when it came into existence.

"Responsible Party" means a natural or legal person, public authority, agency, or other body which, alone or jointly with others, determines the purposes and means of the Processing of Information.

"Special Personal Information ("SPI")" as referred to in Section 26 of PoPIA, includes the following:

- religious or philosophical beliefs;
- race or ethnic origin;
- Trade union membership;
- political persuasion;
- health or sex life;
- biometric information; or
- criminal behaviour.

"Subsidiaries" is a company owned or controlled by CBRE Excellerate Holdings Limited.

"System/s" includes Information Systems and is a general term considered as encompassing any application, network, infrastructure hardware, component, server, voice, control (for example key cards), systems, database, internet, email, and any other device and/or solution.

"Unique Identifier and account numbers" is any identifier that is assigned to a Data Subject and is used by a Responsible Party for the purposes of the operations of that Responsible Party and that uniquely identifies that Data Subject in relation to that Responsible Party.

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4. APPLICATION & SCOPE

The PAIA Manual applies to all Data Processed or held by CBRE Excellerate in relation to their, Data Subjects. This includes but is not limited to the Data of:

- Landlords (i.e. Clients) and their tenants;
- CBRE Excellerate Employees and Job Applicants (including their children where applicable); and
- Service Providers, Suppliers, Vendors and Contractors

The Chief Information Officer and the Entity Information Officers within CBRE Excellerate are the owners of the PAIA Manual. They will primarily be accountable for the ongoing development and maintenance of the PAIA Manual to ensure continuing suitability, adequacy, and effectiveness.

This PAIA Manual is made available in terms of Regulation Number R.187 of 15 February 2002. The PAIA Manual is available for inspection at CBRE Excellerate's offices and on their website: www.cbreexcellerate.com.

In summary, the PAIA Manual provides information on the:

- Subject and categories of records that are held by CBRE Excellerate
- Applicable Legislation;
- The Procedure that needs to be followed and criteria that have to be met by a requester to:
 - Request access to these records;
 - Request that the records be corrected or deleted;
 - To object to the Processing of Data; and
- Contact details of the Chief Information Officer and/or Entity Information Officers as well as the Information Regulator.

5. CONTACT DETAILS

The following person within CBRE Excellerate has been duly appointed as Chief Information Officer and/or Entity Information Officer, to act as the person to whom requests for access to Data must be made in terms of PAIA:

Name of body:	CBRE Excellerate
Head of body:	Russell Kwong Hing
Physical address:	3A Summit Road, Hyde Park, Johannesburg, 2196
Postal address:	Private Bag X45, Benmore, 2010
Switchboard:	011-911 8000

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Fax:	Not Applicable
Website:	www.cbreexcellerate.com.za
Information Officer	Rhonwen Mills
Telephone:	011-911 8000
E-mail:	Rhonwen.Mills@cbreexcellerate.com

6. PROCESSING OF INFORMATION

6.1 CATEGORIES OF DATA SUBJECTS

As per section 1 of PoPIA, a Data Subject may either be a natural or a juristic person. CBRE Excellerate will Process the Information of the following categories of Data Subjects:

- Shareholders (Company Secretarial Records);
- Board members (Company Secretarial Records);
- Directors;
- Employees and Job Applicants;
- Children of CBRE Excellerate Employees;
- Service Providers, Contractors, Consultants;
- Complainants and enquirers;
- Employers and employees of other organisations (Section 197 Transfers);
- Landlords (Clients);
- Tenants of Landlords;
- Visitors or patrons to shopping centres and malls;
- Individuals captured by CCTV images / video; and
- Individuals who have indicated an interest in CBRE Excellerate's products/services

6.2 TYPES / CLASSES OF INFORMATION PROCESSED

6.2.1 The Data which are kept by Excellerate in terms of PoPIA mainly comprise the following categories:

- Information provided by employees;
- Information provided by third parties;
- Training records and material;
- Financial Information;
- Correspondence relating to employees;
- Employment equity plans
- Contracts and Agreements and/or any other Legal records;
- General Correspondence;
- General Administration Records; and
- Building and Property Records

6.2.2 The following business units within Excellerate retain Data to which access may be requested:

6.2.2.1 INTERNAL AUDIT

- The Internal Audit records comprise the following main categories:

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- General Correspondence
- General Administration Records
- Audit Reports and Audit Findings

6.2.2.2 ACCOUNTING

- The Accounting records comprise the following main categories:
 - Accounting Records
 - General Correspondence
 - Management Reports
 - Transactional Records
 - VAT Records
 - Tax Records
 - Consolidation Records
 - Technical Records
 - Departmental Administration Records

6.2.2.3 CORPORATE COMMUNICATION

- The Corporate Communications records comprise the following main categories:
 - Press Releases / Statements

6.2.2.4 COMPANY SECRETARIAL

- The Company Secretarial records comprise the following main categories:
 - General Correspondence
 - Share Registers
 - Statutory Records
 - Shareholders Agreements
 - Registration with statutory bodies

6.2.2.5 HUMAN RESOURCES DEPARTMENT

- Human Resource records comprise the following main categories:
 - General Correspondence
 - Employee Records
 - General Company and HR Policies and Procedures
 - Training Records
 - Pension Records
 - Employee Benefit Records
 - Statutory Records
 - Contracts
 - Labour Relations Records
 - Employment Equity Records
 - PAYE Records

6.2.2.6 INFORMATION TECHNOLOGY ("IT")

- The IT records comprise the following main categories:
 - General Correspondence

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- Contracts and Agreements
- Operational Records
- IT Infrastructure Layouts and Diagrams
- Asset Registers
- IT Acceptable Use Policies

6.2.2.7 SAFETY AND INSURANCE RECORDS

- The Safety and Insurance records comprise the following main categories:
 - General correspondence
 - Insurance Policies and Procedures
 - Statutory records
 - Assets and motor vehicle records
 - Employee-related insurance
 - Property-related insurance

6.2.3 CBRE Excellerate Processes the following main types/classes of PI relating to the Data Subjects:

- Personal details
- Personal views/preferences
- Family details
- Education and employment details
- Visual images of individuals captured on CCTV
- Financial details.

6.2.4 CBRE Excellerate may from time to time Process the following main types/classes of SPI relating to the Data Subjects:

- Racial/ethnic origin
- Offences / alleged offences
- Results from polygraph testing
- Physical/mental health details
- Criminal proceedings, outcomes, and sentences.

6.3 PURPOSE OF PROCESSING

6.3.1 In terms of PoPIA, the purpose for Processing Information must be detailed in this PAIA Manual. The purpose and lawful basis for Processing Information is variable and depends on various factors, such as the nature of the Information, from whom it is collected and the reason it has been collected.

6.3.2 CBRE Excellerate must ensure that they only Process Information relevant to the specific purpose/s it is collected for which is documented within CBRE Excellerate's purpose register

6.3.3 Some of the lawful basis for Processing Information may include:

6.3.3.1 Landlords (i.e. Clients) and their tenants:

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- Rendering service according to instructions given by Landlords (i.e. Clients)
- Provision of value-added services
- Provision of property management services and advice
- Maintaining CBRE Excellerate's accounts and records
- Supporting and managing CBRE Excellerate's employees in the execution of their duties
- Use of CCTV systems to prevent and detect crime
- Fraud prevention and detection
- Market research and statistical analysis
- Compliance with legal and regulatory requirements
- Verifying identity
- Credit vetting

6.3.3.2 For CBRE Excellerate Employees and Job Applicants:

- Verification of Job Applicants' information during the recruitment process
- General matters relating to employees:
 - Personal
 - Pension
 - Medical aid
 - Payroll
 - Disciplinary action
 - Training
- Any other reasonably required purpose relating to the employment or possible employment relationship.

6.3.3.3 For Children

- Providing benefits to the dependants of CBRE Excellerate Employees, who are children.

6.3.3.4 For Service Providers, Suppliers, Vendors and Contractors

- Verifying information and performing checks
- Purposes relating to the agreement or business relationship or possible agreement or business relationships between the parties;
- Payment of invoices
- Complying with CBRE Excellerate's regulatory and other obligations
- Any other reasonably required purpose relating to the CBRE Excellerate business.

6.3.4 CBRE Excellerate also retains Information in terms of the following applicable legislation:

- Arbitration Act 42 of 1965
- Basic Conditions of Employment Act 75 of 1997
- Broad-Based Black Economic Empowerment Act 53 of 2003
- Companies Act 71 of 2008 (as amended)

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- Compensation for Occupational Injuries and Diseases Act 130 of 1993
- Competition Act 89 of 1998
- Constitution of South Africa, 1996
- Copyright Act 98 of 1987
- Consumer Protection Act 68 of 2008
- Criminal Procedure Act 51 of 1977
- Customs and Excise Act, 1964
- Debt Collectors Act 114 of 1998
- Disaster Management Act 53 of 2005
- Electronic Communications and Transactions Act 25 of 2002
- Employment Equity Act 55 of 1998
- Estate Agency Affairs Act 112 of 1976 (insofar as it is still applicable)
- Financial Intelligence Centre Act 38 of 2001
- Income Tax Act 95 of 1967
- Insolvency Act 24 of 1936
- Labour Relations Act 66 of 1995
- National Credit Act 34 of 2005
- National Building Regulations and Building Standards Act 103 of 1977
- National Environment Management Act 31 of 1998
- Occupational Health and Safety Act 85 of 1993
- Pension Funds Act 24 of 1956
- Prevention of Organised Crime Act 121 of 1998
- Prevention and Combatting of Corrupt Activities Act 12 of 2004
- Promotion of Access of Information Act 2 of 2000
- Promotion of Equality and Prevention of Unfair Discrimination Act 4 of 2000
- Property Practitioners Act 22 of 2019
- Property Valuers Profession Act 2 of 2000
- Protection of Personal Information Act 4 of 2013
- Short Term Insurance Act 53 of 1998
- Skills Development Levies Act 9 of 1999
- Skills Development Act 97 of 1998
- Spatial Planning and Land Use Management Act 16 of 2013
- Tobacco Products Control Act 83 of 1993
- Unemployment Contributions Act 4 of 2002
- Unemployment Insurance Act 63 of 2001
- Value Added Tax Act 89 of 1991.

6.3.5 CBRE Excellerate sometimes needs to share the Information it Processes with the Data Subjects themselves and/or with other third parties. The sharing of the information could be locally or cross-border. Where this is necessary, CBRE Excellerate is required to comply with all aspects of PoPIA.

7. GENERAL DESCRIPTION OF DATA SECURITY MEASURES

7.1 The security of your Data is important to CBRE Excellerate, and they have implemented reasonable Physical, Technical and Administrative Security Standards to protect Data from loss, misuse, alteration, or destruction. We protect your Data against unauthorised access, use or disclosure, using Security Technologies and procedures, such as encryption and limited access. Only authorised individuals are entitled to access Data, and they receive

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training about the importance of protecting the Data.

8. ACCESS TO RECORDS IN TERMS OF PAIA

Records held by CBRE Excellerate may be accessed on request only once the requirements for access have been met. Section 50 of PAIA states that a Requester must be given access to any record of a private body if:

- that record is required for the exercise or protection of any rights;
- that person complies with the procedural requirements in this Act relating to a request for access to that record; and
- access to that record is not refused in terms of any ground for refusal contemplated in Chapter 4, Part 3 of the Act.

8.1 ACCESS REQUEST PROCEDURE

8.1.1 As envisaged in Section 51(1)(e) of PAIA, the purpose of this section is to provide requesters with sufficient guidelines and procedures to facilitate a request for access to records held by CBRE Excellerate.

8.1.2 A requester must be given access to any record of CBRE Excellerate if:

- The record is required for the exercise of protection of any rights;
- The person complies with the procedural requirements in PAIA in order to request access to that record; and
- Access to that record is not refused in terms of any ground for refusal contemplated in PAIA.

8.1.3 It is important to note that an application for access to Data can be refused if the application does not comply with the procedural requirements of PAIA. In addition, the successful completion and submission of an access request form does not automatically allow the requester access to the requested record.

8.1.4 If it is reasonably suspected that the requester has obtained access to CBRE Excellerate's records through the submission of materially false or misleading Data, legal proceedings may be instituted against such requester.

8.2 COMPLETION OF THE ACCESS REQUEST FORM

8.2.1 In order for CBRE Excellerate to respond to requests in a timely manner, the Access Request Form (Annexure A) must be completed, taking due cognisance of the following Instructions:

- the Access Request Form must be completed in English.
- type or print in BLOCK LETTERS an answer to every question.
- if a question does not apply, state "NOT APPLICABLE" in response to that question.
- if there is nothing to disclose in reply to a particular question, state "NIL" in response to that question.
- if there is insufficient space on a printed form in which to answer a question, additional information may be provided on an additional folio.

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- when the use of an additional folio is required, precede each answer thereon with the title applicable to that question.

8.3 SUBMISSION OF ACCESS REQUEST FORM

8.3.1 The completed Access Request Form (Annexure A) must be submitted via e-mail and must be addressed to the relevant Chief Information Officer and/or Entity Information Officers as envisaged above.

8.4 FEES

8.4.1 Section 22 of PAIA, read together with Regulation 8 of the PAIA Regulations, provides for 2 (two) types of fees:

8.4.2 A **request fee**, which will be a standard fee [refer to Regulation 4 of the PAIA Regulations] and an **access fee** [refer to Regulations 5 and 7 of the PAIA Regulations], which must be calculated by taking into account reproduction costs, search and preparation time and cost, as well as postal costs where applicable. When a request is received by the Chief Information Officer and/or Entity Information Officers of CBRE Excellerate, they must by notice require the requester, other than a personal requester, to pay the prescribed request fee (if any) before further Processing of the request. If a search for the record is necessary and the preparation of the record for disclosure, including arrangement to make it available in the requested form, requires more than the hours prescribed in the Regulations for this purpose, the Chief Information Officer and/or Entity Information Officers must notify the requester to pay as a deposit the prescribed portion of the access fee which would be payable if the request is granted.

8.4.3 The Chief Information Officer and/or Entity Information Officers must withhold a record until the requester has paid the fee or fees as indicated. A requester whose request for access to a record has been granted must pay an access fee for reproduction and for search and preparation, and for any time reasonably required in excess of the prescribed hours to search for and prepare the record for disclosure including making arrangements to make it available in the request form. If a deposit has been paid in respect of a request for access, which is refused, then the Chief Information Officer and/or Entity Information Officers must repay the deposit to the requester.

8.4.4 Payment details can be obtained from the relevant Chief Information Officer and/or Entity Information Officers (as per paragraph 5 above). Payment can be made either via a direct deposit, by bank-guaranteed cheque or by postal order (no credit card payments are accepted). Proof of payment must be supplied.

8.5 NOTIFICATION

8.5.1 Requests will be evaluated, and the requester notified within 30 (thirty) days of receipt of the completed Access Request Form (**Annexure A**). Notifications may include:

8.5.1.1 Notification of Extension Period (if required)

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- The requesters may be notified whether an extension period is required for the Processing of their requests, including:
 - The required extension period, which will not exceed an additional 30 (thirty) day period;
 - Adequate reasons for the extension; and
 - Notice that the requester may lodge an application with a court against the extension and the procedure, including the period, for lodging the application.

8.5.1.2 Payment of Deposit (if applicable)

- The requester may be notified whether a deposit is required. A deposit will be required depending on certain factors such as the volume and/or format of the Data requested, and the time required for the search and preparation of the record(s). The notice will state:
 - The amount of the deposit payable (if applicable); and
 - That the requester may lodge an application with a court against the payment of the deposit and the procedure, including the period, for lodging the application.
 - In the event that access is refused to the requested

8.5.1.3 Decision on Request

- If no extension period or deposit is required, the requesters will be notified within 30 (thirty) days of the decision on their requests.
- If the request for access to a record is successful, the requester will be notified of the following:
 - The amount of the access fee payable upon gaining access to the record (if any);
 - An indication of the form in which the access will be granted;
 - Notice that the requester may lodge an application with a court against the payment of the access fee and the procedure, including the period, for lodging the application.
- If the request for access to a record is not successful, the requester will be notified of the following:
 - Adequate reasons for the refusal [refer to paragraph 8.6 (Third Party Data) and paragraph 8.7 (Grounds for Refusal) below]; and
 - That the requester has the remedies available as detailed in paragraph 8.9 (Remedies Available when Request is Refused) below.

8.6 THIRD PARTY DATA

8.6.1 If access is requested to a record that contains data about a third party, CBRE Excellerate is obliged to attempt to contact this third party to inform them of the request. This

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enables the third party the opportunity of responding by either consenting to the access or by providing reasons why the access must be denied.

8.6.2 In the event of the third-party furnishing reasons for the support of denial of access, our designated contact person will consider these reasons in determining whether access must be granted, or not.

8.7 GROUNDS FOR REFUSAL

8.7.1 CBRE Excellerate may legitimately refuse to grant access to a requested record that falls within a certain category. Grounds on which CBRE Excellerate may refuse access include:

- Disclosure of the record (containing trade secrets, commercial, scientific, technical or any other confidential information) would harm the commercial or financial interests of CBRE Excellerate.
- The record is privileged from production in legal proceedings, unless the legal privilege has been waived.
- Protecting Data that CBRE Excellerate holds about a third person (who is a natural person), including a deceased person, from unreasonable disclosure.
- Protecting commercial information that CBRE Excellerate holds about a third party or Landlords (clients) (for example trade secrets: financial, commercial, scientific or technical information that may harm the commercial or financial interests of these clients or the third party).
- Disclosure of the record would result in a breach of duty of confidence owed to a third party in terms of an agreement.
- Disclosure of the record would endanger the life or physical safety of an individual.
- Disclosure of the record would prejudice or impair the security of property or means of transport.
- Disclosure of the record would prejudice or impair the protection of a person in accordance with a witness protection scheme.
- Disclosure of the record would prejudice or impair the protection of the safety of the public.
- Disclosure of the record would put CBRE Excellerate at a disadvantage in contractual or other negotiations or prejudice it in commercial competition
- The record is a computer program.
- The record contains Data about research being carried out or about to be carried out on behalf of a third party or CBRE Excellerate.

8.8 RECORDS THAT CANNOT BE FOUND OR DO NOT EXIST

8.8.1 If CBRE Excellerate has searched for a record and it is believed that the record either does not exist or cannot be found, the requester will be notified by way of an affidavit or affirmation. This will include the steps that were taken to try to locate the record.

8.9 REMEDIES AVAILABLE WHEN A REQUEST IS REFUSED

8.9.1 Remedies available to a Data Subject when a request is refused:

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- A requestor that is dissatisfied with the Chief Information Officer and/or Entity Information Officers' refusal to disclose Data, may within 30 (thirty) days of notification of the decision, may apply to a Court for relief;
- A third party dissatisfied with the Chief Information Officer and/or Entity Information Officers' decision to grant a request for Data, may within 30 (thirty) days of notification of the decision, apply to a Court for relief;
- For purposes of PAIA, the Courts that have jurisdiction over these applications are the Constitutional Court, the High Court or another court of similar status and a Magistrate's Court designated by the Minister of Justice and Constitutional Development, and which is presided over by a designated Magistrate; and
- Lodge a complaint with the Information Regulator, who's contact details are included in this PAIA Manual.

9. DOCUMENT OBJECTION TO THE PROCESSING OF INFORMATION BY A DATA SUBJECT

9.1 Section 11 (3) of PoPIA and Regulation 2 of the PoPIA Regulations provides that a Data Subject may, at any time object to the Processing of his / her / its Information in the prescribed form attached to this PAIA Manual as Annexure B subject to exceptions contained in PoPIA.

10. REQUEST FOR CORRECTION OR DELETION OF INFORMATION

10.1 Section 24 of PoPIA and Regulation 3 of the PoPIA Regulations provides that a Data Subject may request for their Information to be corrected / deleted in the prescribed form attached as Annexure C to this PAIA Manual.

11. INFORMATION REGULATOR

Any enquiries regarding this guide and its contents must be directed to:

The INFORMATION REGULATOR

JD House, 27 Siemens Street
Braamfontein
Johannesburg
2017
P O Box 31533, Braamfontein, Johannesburg, 2017

Specific email addresses have been set up by the Information Regulator for the purposes as outlined below:

General enquiries:

enquiries@info regulator.org.za

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Complaints (complete PoPIA/PAIA form 5, which is available on the Website of the Information Regulator) –

- If your PAIA request has been denied or there is no response from a private body for access to records, you may use this email address to lodge a complaint:

PAIAComplaints@infoeregulator.org.za

- If you feel that your Information has been violated, you may use this e-mail address to lodge a complaint:

The Website address for the Information Regulator is as follows:

<https://www.justice.gov.za/infoereg/>

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12. ANNEXURE A - ACCESS REQUEST FORM

REQUEST FOR ACCESS TO RECORD OF PRIVATE BODY Section 53(1) of the Promotion of Access to Information Act, 2 of 2000 [Regulation 10]

A. Particulars of private body

The Head:

--

B. Particulars of person requesting access to the record

(a) The particulars of the person who requests access to the record must be given below. (b) The address and/or fax number in the Republic to which the Data is to be sent. (c) Proof of the capacity in which the request is made, if applicable, must be attached.
--

Full names and surname:													
Identity number:													
Postal address:													
Telephone number:	()												
E-mail address:													

Capacity in which request is made, when made on behalf of another person:

--

C. Particulars of person on whose behalf request is made

This section must be completed ONLY if a request for Data is made on behalf of another person.
--

Full names and surname:													
Identity number:													

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D. Particulars of record

- (a) Provide full particulars of the record to which access is requested, including the reference number if that is known to you, to enable the record to be located.
- (b) If the provided space is inadequate, please continue on a separate folio and attach it to this form.

1. Description of record or relevant part of the record:

2. Reference number, if available:

3. Any further particulars of record:

E. Fees

- (a) A request for access to a record, other than a record containing Data about yourself, will be Processed only after a request fee has been paid.
- (b) You will be notified of the amount required to be paid as the request fee.
- (c) The fee payable for access to a record depends on the form in which access is required and the reasonable time required to search for and prepare a record.
- (d) If you qualify for exemption of the payment of any fee, please state the reason for exemption.

Reason for exemption from payment of fees:

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F. Form of access to record

If you are prevented by a disability to read, view, or listen to the record in the form of access provided for in 1 to 4 hereunder, state your disability and indicate in which form the record is required.

Disability:	Form in which record is required:
Form in which record is required:	
<p>Mark the appropriate box with an X.</p> <p>NOTES:</p> <p>(a) Compliance with your request in the specified form may depend on the form in which the record is available.</p> <p>(b) Access in the form requested may be refused in certain circumstances. In such a case you will be informed if access will be granted in another form.</p> <p>(c) The fee payable for access for the record, if any, will be determined partly by the form in which access is requested.</p>	

1. If the record is in written or printed form:			
<input type="checkbox"/>	copy of record*	<input type="checkbox"/>	inspection of record
2. If record consists of visual images this includes photographs, slides, video recordings, computer-generated images, sketches, etc)			
<input type="checkbox"/>	view the images	<input type="checkbox"/>	copy of the images"
<input type="checkbox"/>		<input type="checkbox"/>	transcription of the images*
3. If record consists of recorded words or information which can be reproduced in sound:			
<input type="checkbox"/>	listen to the soundtrack audio cassette	<input type="checkbox"/>	transcription of soundtrack* written or printed document
4. If record is held on computer or in an electronic or machine-readable form:			
<input type="checkbox"/>	printed copy of record*	<input type="checkbox"/>	printed copy of information derived from the record"
<input type="checkbox"/>		<input type="checkbox"/>	copy in computer readable form* (stiffy or compact disc)
<p>'If you requested a copy or transcription of a record (above), do you wish the copy or transcription to be posted to you? Postage is payable.</p>			<p>YES NO</p>

G. Particulars of right to be exercised or protected

Indicate which right is to be exercised or protected:

Explain why the record requested is required for the exercise or protection of the aforementioned right:

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H. Notice of decision regarding request for access

You will be notified in writing whether your request has been approved/denied. If you wish to be informed in another manner, please specify the manner and provide the necessary particulars to enable compliance with your request.

How would you prefer to be informed of the decision regarding your request for access to the record?

Signed at..... this..... day of20.....

**SIGNATURE OF REQUESTER /
PERSON ON WHOSE BEHALF REQUEST IS MADE**

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13. ANNEXURE B - OBJECTION TO THE PROCESSING OF INFORMATION IN TERMS OF SECTION 11(3) OF POPIA

Regulations Relating to the Protection of Personal Information, 2018

Note:

1. Affidavits or other documentary evidence as applicable in support of the request may be attached.
2. If the space provided for in this Form is inadequate, submit information as an Annexure to this Form and sign each page.
3. Complete as is applicable.

A	DETAILS OF DATA SUBJECT
Name(s) and surname/ registered name of Data Subject:	
Unique Identifier/ Identity Number	
Residential, postal, or business address:	
Contact number(s):	
Fax number / E-mail address:	
Name(s) and surname/ registered name of Data Subject:	
B	DETAILS OF RESPONSIBLE PARTY
Name(s) and surname/ registered name of Data Subject:	
Residential, postal, or business address	
Contact number(s):	
Fax number / E-mail address:	
C	REASONS FOR OBJECTION IN TERMS OF SECTION 11(1)(d) to (f) <i>(Please provide detailed reasons for the objection)</i>

Signed at..... this..... day of20.....

Signature of Data Subject/Designated Person

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14. ANNEXURE C - REQUEST FOR CORRECTION / DELETION OF OR DESTROYING / DELETING A RECORD IN TERMS OF SECTION 24(1) OF POPIA

Regulations Relating to the Protection of Personal Information, 2018 [Regulation 3]

Note:

4. Affidavits or other documentary evidence as applicable in support of the request may be attached.
5. If the space provided for in this Form is inadequate, submit information as an Annexure to this Form and sign each page.
6. Complete as is applicable.

Mark the appropriate box with an "X".

Request for:

- Correction or deletion of the Information about the Data Subject which is in possession or under the control of the Responsible Party.
- Destroying or deletion of a record of Information about the Data Subject which is in possession or under the control of the Responsible Party and who is no longer authorised to retain the record of information.

A	DETAILS OF DATA SUBJECT
Name(s) and surname/ registered name of Data Subject:	
Unique Identifier/ Identity Number	
Residential, postal, or business address:	
Contact number(s):	
Fax number / E-mail address:	
Name(s) and surname/ registered name of Data Subject:	
B	DETAILS OF RESPONSIBLE PARTY
Name(s) and surname/ registered name of Data Subject:	
Residential, postal or business address	
Contact number(s):	
Fax number / E-mail address:	
C	REASONS FOR OBJECTION IN TERMS OF SECTION 11(1)(D) to (F) <i>(Please provide detailed reasons for the objection)</i>

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D	REASONS FOR *CORRECTION OR DELETION OF THE PERSONAL INFORMATION ABOUT THE DATA SUBJECT IN TERMS OF SECTION 24(1)(A) WHICH IS IN POSSESSION OR UNDER THE CONTROL OF THE RESPONSIBLE PARTY; AND/OR REASONS FOR *DESTRUCTION OR DELETION OF A RECORD OF PERSONAL INFORMATION ABOUT THE DATA SUBJECT IN TERMS OF SECTION 24(1)(B) WHICH THE RESPONSIBLE PARTY IS NO LONGER AUTHORISED TO RETAIN. (Please Provide Detailed Reasons for the Request)

Signed at..... this..... day of20.....

Signature of Data Subject/Designated Person

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15. REVISION HISTORY

The following revisions have been made to this procedure since initial publication:

Rev No	Revision Date	List of Changes
01	30 October 2024	New document

16. APPROVAL & DATES

This Procedure has been approved for use at CBRE Excellerate:

	Full Names	Position	Date	Signature
Prepared by	Thini Ngonyama	Compliance Manager	30 October 2024	
Reviewed & approved by	Russell Kwong Hing	CEO	30 October, 2024	