



D E · Z A N D T
DEVELOPMENT (PTY) LTD

PAIA MANUAL

De Zandt Development (Pty) Ltd

Registration Number: 2014/019543/07

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

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1. List Of Acronyms and Abbreviations

Acronym	Meaning
CIPC	Companies and Intellectual Property Commission
FICA	Financial Intelligence Centre Act 38 of 2001
IO	Information Officer
PAIA	Promotion of Access to Information Act 2 of 2000, as amended
POPIA	Protection of Personal Information Act 4 of 2013
Regulator	The Information Regulator (South Africa)
Republic	Republic of South Africa
the Company / De Zandt	De Zandt Development (Pty) Ltd

2. Purpose of this PAIA Manual

This PAIA Manual ("Manual") is published by De Zandt Development (Pty) Ltd ("De Zandt" or "the Company") in accordance with section 51 of PAIA. It is intended to assist members of the public to:

- 2.1 identify the categories of records held by De Zandt that are available without a person having to submit a formal request for access;
- 2.2 gain a sufficient understanding of how to make a request for access to a record held by De Zandt, including a description of the subjects on which De Zandt holds records and the categories of records held on each subject;
- 2.3 identify the records of De Zandt which are available in accordance with legislation other than PAIA;
- 2.4 obtain the contact details of the Information Officer (and any Deputy Information Officer) who will assist members of the public wishing to access records;
- 2.5 access the Regulator's guide on how to use PAIA, and to know how that guide may be obtained;
- 2.6 understand whether De Zandt processes personal information, the purposes for which it does so, and the categories of data subjects and information concerned;
- 2.7 know the recipients or categories of recipients to whom personal information may be supplied;
- 2.8 know whether De Zandt has planned to transfer personal information outside the Republic, and to whom; and
- 2.9 understand the general security measures De Zandt applies to protect the confidentiality, integrity and availability of personal information it processes.

3. Introduction to De Zandt Development

- 3.1** De Zandt Development (Pty) Ltd is a private company duly incorporated in terms of the company laws of the Republic and registered with the CIPC under registration number 2014/019543/07.
- 3.2** De Zandt Development is a property development company. Its current development is the De Zandt Lifestyle Estate, situated in Sandbaai, Hermanus, Western Cape.
- 3.3** De Zandt Development offers property development services from inception to completion, including the planning, development, marketing and sale of property. In order to professionally render these services, De Zandt Development makes use of various third-party service providers, including (without limitation) conveyancing attorneys, estate agents, financial institutions and building contractors. Further detail regarding these third-party service providers is available in the Privacy Statement published on De Zandt's website.

4. Key Contact Details for Access to Information (Section 51(1)(a))

4.1 Information Officer

Field	Details
Name	Jan van Staden
Telephone Number	021 205 3636
E-mail	info@dezandt.co.za
Business Address	The Vineyards Office Estate, 99 Jip de Jager Drive, De Bron, Bellville, 7530

4.2 Registered Business / Office Details

Field	Details
Physical Address	The Vineyards Office Estate, 99 Jip de Jager Drive, De Bron, Bellville, 7530
Postal Address	The Vineyards Office Estate, 99 Jip de Jager Drive, De Bron, Bellville, 7530
Telephone Number	021 205 3636
E-mail	info@dezandt.co.za
Website	www.dezandt.co.za

4.3 Contact Details of the Information Regulator

Field	Details
Postal Address	P.O. Box 31533, Braamfontein, Johannesburg, 2017
Telephone Number	010 023 5200
E-mail	enquiries@inforegulator.org.za
Website	https://inforegulator.org.za/

5. Categories of Records Available Without a Person Having to Request Access (Section 52)

De Zandt Development voluntarily makes the following categories of records available to the public without the need for a formal request for access:

Category of Record	Type of Record	Available on Website	Available on Request
PAIA Manual	External policy & manual	X	X
Privacy Statement / POPIA information	External policy	X	X
General marketing and development information	Marketing material	X	
Company registration and general corporate information	Corporate information		X

6. Description Of Records Available in Accordance with Other Legislation (Section 51(1)(c))

De Zandt Development holds and/or generates records in terms of the following legislation, among others, as applicable to its business and operations:

Legislation	Legislation
Companies Act 71 of 2008	Income Tax Act 58 of 1962
Value-Added Tax Act 89 of 1991	Basic Conditions of Employment Act 75 of 1997
Labour Relations Act 66 of 1995	Employment Equity Act 55 of 1998
Occupational Health and Safety Act 85 of 1993	Unemployment Insurance Act 63 of 2001
Skills Development Levies Act 9 of 1999	Financial Intelligence Centre Act 38 of 2001
Deeds Registries Act 47 of 1937	Alienation of Land Act 68 of 1981
Property Practitioners Act 22 of 2019 (to the extent applicable)	Sectional Titles Act 95 of 1986 / Sectional Titles Schemes Management Act 8 of 2011 (where applicable to the relevant development)
Consumer Protection Act 68 of 2008	Protection of Personal Information Act 4 of 2013

6.1 Category of Record to Legislation Mapping

Category of Records	Applicable Legislation
Memorandum of Incorporation, share register, minutes of directors' meetings	Companies Act 71 of 2008
Annual financial statements, accounting and tax records	Income Tax Act 58 of 1962; Value-Added Tax Act 89 of 1991
Employee records, payroll, UIF, skills development levies	Basic Conditions of Employment Act 75 of 1997; Labour Relations Act 66 of 1995; Employment Equity Act 55 of 1998;

	Unemployment Insurance Act 63 of 2001; Skills Development Levies Act 9 of 1999
Client identification and verification records	Financial Intelligence Centre Act 38 of 2001
Sale agreements, transfer and title records	Deeds Registries Act 47 of 1937; Alienation of Land Act 68 of 1981; Property Practitioners Act 22 of 2019; Sectional Titles Act 95 of 1986 / Sectional Titles Schemes Management Act 8 of 2011, where applicable
PAIA Manual	Promotion of Access to Information Act 2 of 2000
Privacy Statement / POPIA compliance records	Protection of Personal Information Act 4 of 2013

7. Description of the Subjects on Which De Zandt Holds Records, and the Categories of Records Held on Each Subject (Section 51(1)(d))

Subject	Categories of Records Held
Marketing	Names, surnames, e-mail addresses and contact numbers of prospective purchasers and enquirers, provided via De Zandt's website and other sales channels.
Property transactions	Sale agreements, deeds of sale, transfer and registration documentation, and financial information relating to purchasers of property in De Zandt's developments.
Client identification and verification (FICA)	Documents and verifications required under De Zandt's Risk Management and Compliance Programme to identify, verify and screen clients.
Service providers	Agreements, proposals, correspondence and reports relating to attorneys, estate agents, contractors and other appointed service providers.
Human resources	HR policies and procedures, employee records, payroll and taxation records.
Corporate governance	Memorandum of Incorporation, minutes of directors' meetings, share register and other statutory registers.
Financial and tax records	Annual financial statements, accounting records, banking records and tax returns.
Business and strategic records	Business plans, project proposals, feasibility studies, and, where applicable, beneficial ownership information.

8. Processing of Personal Information

8.1 Purpose of Processing Personal Information

De Zandt Development obtains and processes personal information of data subjects for the purpose of:

8.1.1. marketing its developments to prospective purchasers;

8.1.2. the sale, conveyancing and transfer of immovable property;

- 8.1.3** the identification and verification of clients as required by the Financial Intelligence Centre Act;
- 8.1.4** servicing contractual obligations with appointed service providers and contractors;
- 8.1.5** ensuring compliance with the Companies Act and other applicable legislation; and
- 8.1.6** the general and effective administration of the business.

8.2 Categories of Data Subjects and Related Information

Category of Data Subject	Information Held
Property purchasers	Name, address, identification number, registration number (where a company/trust), contact details, and information relating to the property purchased.
Prospective clients / website enquirers	Name, contact number and e-mail address.
Landowners / co-development partners (where applicable)	Beneficial ownership information, names, addresses, registration numbers, contracts and financial information.
Service providers and contractors	Name, address, identification/registration number, banking details, SARS and VAT registration numbers, contracts and proposals.
Employees	Name, address, identification number, contact details, banking details and qualifications.

8.3 Recipients of Personal Information

Category of Personal Information	Recipient(s)
Name, identity/registration number, address, contract and transactional information	Financial Intelligence Centre; conveyancing attorneys; deeds registry; relevant municipal authorities
Identity number and name, for criminal or credit checks where relevant to a transaction	South African Police Service; credit bureaux (where applicable)
Financial information	Financial institutions and bond originators, where relevant to a purchaser's transaction

8.4 Planned Transborder Flows of Personal Information

De Zandt Development may make use of cloud-based service providers for functions such as customer relationship management, document management, accounting and e-mail. These services may store and process personal information in data centres located outside of South Africa. Where reasonably possible, De Zandt seeks to use service providers that host data within South Africa. Where personal information is transferred outside of the Republic, De Zandt takes reasonable steps to ensure that appropriate contractual and technical safeguards are in place to comply with POPIA's requirements for cross-border transfers.

8.5 General Description of Information Security Measures

De Zandt Development implements reasonable technical and organisational measures to safeguard personal information against loss, damage, unauthorised destruction and unlawful access, including:

8.5.1 Technical Safeguards

- Encryption of personal information in transit and, where applicable, at rest;
- Role-based access control and appropriate authentication mechanisms;
- Network security measures, including firewalls and secure network configuration;
- Endpoint protection, including antivirus/anti-malware software and regular security updates; and
- Regular, tested data backup and recovery procedures.

8.5.2 Organisational Safeguards

- Internal policies governing information security, data protection and the acceptable use of systems;
- Access granted on a least-privilege basis and reviewed periodically;
- Employee training and awareness on data protection and confidentiality; and
- Contractual data protection obligations imposed on third-party service providers.

8.5.3 Physical and Organisational Response Measures

- Controlled physical access to De Zandt's premises and devices;
- Use of reputable service providers whose data centres apply appropriate physical security controls; and
- Procedures to identify, report on and respond to security incidents or data breaches, including notification in accordance with POPIA where required.

9. Form of a Request for Access to Information (Section 51(1)(e))

- 9.1** PAIA grants a requester access to a record of a private body where that record is required for the exercise or protection of a right, and where a public body makes such a request, it must be acting in the public interest.
- 9.2** A requester must use the prescribed Form 2 (see Form 2 uploaded separately to the website, also available for download from <https://inforegulator.org.za/paia-forms/>) to request access to a record held by De Zandt Development.
- 9.3** The completed Form 2 must be addressed to the Information Officer at the contact details set out in clause 4.1 above.
- 9.4** The requester must provide sufficient detail on Form 2 to enable De Zandt to identify the requester, the record being requested, and the format in which access is sought.
- 9.5** The requester must provide sufficient contact details and, where the requester wishes to be informed of the decision in a particular manner, must specify that manner.
- 9.6** The requester must state the right which they are seeking to exercise or protect, and explain why the requested record is required for that purpose.
- 9.7** Once De Zandt has considered the request, the requester will be notified of the decision in the required form.

- 9.8** Where a request is granted, an access fee may be payable for the reproduction, search and preparation of the record, including for time spent in excess of the prescribed free search and preparation period.

10. Prescribed Fees

- 10.1** A requester seeking access to a record containing their own personal information is not required to pay a request fee.
- 10.2** Every other requester must pay the prescribed request fee before the request will be processed further.
- 10.3** Where the preparation of a record requires more than the prescribed free search and preparation time, a deposit (of not more than one third of the applicable access fee) may be required before the request is processed further. A requester may apply to court against the imposition of, or amount of, a request fee, access fee or deposit.
- 10.4** Records may be withheld until the applicable fees have been paid.
- 10.5** The current fee structure is prescribed in the Regulations made under PAIA (as amended from time to time) and is available from the Regulator's website at <https://info regulator.org.za/paia-forms/>.

11. Availability of the Manual (Section 51(3))

- 11.1** This Manual is available –
- on De Zandt Development's website at www.dezandt.co.za;
 - for inspection, free of charge, at De Zandt's business premises during normal business hours;
 - to any person upon request and, where applicable, upon payment of the prescribed fee for reproduction; and
 - to the Information Regulator upon request.
- 11.2** A fee for a printed copy of the Manual shall be payable per page, calculated in accordance with the fee schedule prescribed under PAIA.

12. Updating of the Manual

The Information Officer of De Zandt Development will review and, where necessary, update this Manual on a regular basis to ensure it remains accurate and compliant with PAIA and POPIA.