

**LIBERTY TWO DEGREES LIMITED (REGISTRATION NUMBER 2018/388909/06) INFORMATION
MANUAL**

*Published in terms of Section 51 of the Promotion of Access to Information Act, 2 of 2000 ("PAIA") As
amended by the Protection of Personal Information Act, 4 of 2013 ("POPIA")*

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1. INTRODUCTION

This information manual is in respect of Liberty Two Degrees Limited including all wholly owned subsidiaries and associated juristic persons, hereinafter referred to as “Liberty Two Degrees Limited”. Refer to **Annexure 3** of this document for a complete list of subsidiaries.

This Manual is compiled in accordance with section 51 of PAIA as amended by the Protection of Personal Information Act, 2013 ("POPIA"), which gives effect to everyone’s Constitutional right to privacy and largely commenced on 1 July 2020. POPIA promotes the protection of personal information processed by public and private bodies, including certain conditions, so as to establish minimum requirements for the processing of personal information. POPIA amends certain provisions of PAIA, balancing the need for access to information against the need to ensure the protection of personal information by providing for the establishment of an Information Regulator to exercise certain powers and perform certain duties and functions in terms of POPIA and PAIA, providing for the issuing of codes of conduct and providing for the rights of persons regarding unsolicited electronic communications and automated decision making in order to regulate the flow of personal information and to provide for matters concerned therewith.

This PAIA manual also includes information on the submission of objections to the processing of personal information and requests to delete or destroy personal information or records thereof in terms of POPIA.

For purposes of this Manual, we refer to ourselves as “Liberty Two Degrees Limited”, “we”, “us” or “our”.

This information manual (“Manual”) provides an outline of the types of records held by Liberty and explains how one may submit requests for access to these records in terms of the Promotion of Access to Information Act, 2 of 2000 (the “Act”).

The Act gives effect to everyone’s constitutional right of access to information held by private sector bodies (e.g. companies) or public bodies (i.e. Government institutions) that is required for the exercise and/or protection of the requester’s rights.

For further guidance, contact the Information Regulator. They have compiled a [PAIA guide](#) in each official language of South Africa on how to exercise your rights under PAIA.

Physical address: The Information Regulator (South Africa)

JD House, 27 Stiemens Street

Braamfontein

2001

Postal address: PO Box 31533, Braamfontein, 2017

Telephone number: +27 10 023 5207

Fax number: +27 11 403 0668

PAIA Complaints email: PAIAComplaints@inforegulator.org.za

POPIA Complaints email: POPIAComplaints@inforegulator.org.za

General enquiries email: enquiries@infoeregulator.org.za

2. AVAILABILITY OF THIS MANUAL

You, the requester, can access this Manual on our website (<https://www.liberty2degrees.co.za/>) and at the head office of the Liberty Two Degrees Limited during normal business hours or by requesting a copy by e-mail from the Group Privacy Office as provided for in paragraph 4 below.

This manual is available to any person upon payment of a reasonable amount.

This manual is available to the Information Regulator upon request.

3. REQUESTS FOR INFORMATION

You may submit your request for information records to the Information Officer as provided for in paragraph 4 below. It is recommended that you read this manual first, in particular paragraphs 6 through 9, before submitting any requests.

4. INFORMATION OFFICER AND DEPUTY INFORMATION OFFICER CONTACT DETAILS

Information Officer: Farhana Haffejee

Deputy Information Officer: Benjamin Swanepoel

Information Regulator Reference Number: 15761/2021-2022/IRRTT

Postal Address:

Postnet Suite 85

Private Bag x9976

Sandton City

Gauteng

2146

Physical Address:

3rd Floor, West Office Block

Nelson Mandela Square

Corner Maude and 5th Street

Sandton

2196

Telephone and email:

Telephone: +27 11 4485500

Email address: info@liberty2degrees.co.za

Website address: www.liberty2degrees.co.za

5. LIBERTY TWO DEGREES PRIVACY PRACTICES

5.1. Introduction:

The PROTECTION OF PERSONAL INFORMATION ACT, 2013 (section 51(1)(c)(i-iv)) ("POPIA") requires us to provide you with certain information relating to how personal information that we process is, amongst others, used, disclosed and destroyed.

We have set out the required information below.

5.2. How to request access to your personal information under POPIA:

Requests for personal information under POPIA must be made in accordance with the provisions of PAIA. This process is outlined below.

If we provide you with your personal information, you have the right to request the correction, deletion, or destruction of your personal information, in the prescribed form. You may also object to the processing of your personal information in the prescribed form.

We have attached the prescribed forms to this Manual for your convenience (**Annexure 1**).

We will give you a written estimate of the fee for providing you with your personal information, before providing you with the services. We may also require you to provide us with a deposit for all or part of the fee prior to giving you the requested personal information.

5.3. Purpose of Processing:

POPIA provides that personal information may only be processed lawfully and in a reasonable manner that does not infringe on your (the data subject's) privacy.

The type of personal information that we process will depend on the purpose for which it is collected. We will disclose to you why the personal information is being collected and will process the personal information for that purpose only. Generally, we process the personal information of the data subjects in order to:

- Operate various properties that we own as rental enterprises;

- Execute on contractual arrangements;
- Meet our responsibilities to customers, employees, and other natural or juristic persons;
- Execute specific instructions;
- Inform you of new services; and
- Make sure our business suits your needs.

Note: this list is not exhaustive

5.4. Personal information that is processed and the category of the data subject:

The information provided under this section refers to broad categories of information (see clause 6.1.1 for more details on the personal information that is processed. This list is not exhaustive.

- 5.4.1. Tenants - Natural Persons, Juristic Persons and Entities as well as Foreign Persons and Entities.
- 5.4.2. Contracted Service Providers: natural and juristic persons/entities.
- 5.4.3. Employees, Directors, Potential Personnel, Shareholders, Volunteers, Employees' family members and Temporary Staff.
- 5.4.4. Customers: Natural persons and Juristic Persons.
- 5.4.5. Website end-users / Application end-users
- 5.4.6. Wi-Fi end-users

5.5. Categories of recipients for the purposes of processing personal information:

We may supply personal information to these potential recipients:

- Management;
- Employees;
- Temporary staff;
- Sub-contracted operators;
- Other recipients;
- Any regulatory authority (including, but not limited to, the Information Regulator);
- Any other entity in order to comply with any regulation passed under relevant legislation, or as a result of any legal process;
- Any other person or organization in order to protect and defend Liberty Two Degree's rights and property (including Liberty Two Degree's intellectual property).
- Any person or organization in order to protect the public interest;
- Group companies, including Liberty Group Limited, STANLIB Limited and/or Standard Bank Group

- Third-party service providers in order to uphold contractual obligations or service customers.

We may disclose personal information we collected to any of our overseas subsidiaries, associate entities, or third-party service providers, with whom we engage in business or whose services or products we elect to use, including cloud services hosted in international jurisdictions.

We endeavour to enter into written agreements to ensure that other parties comply with our confidentiality and privacy requirements. Personal information may also be disclosed where we have a legal duty or a legal right to do so.

5.6. Actual or Planned Trans-Border Information Flows

We may disclose personal information we collected to our shareholders, any of our overseas subsidiaries, associate entities, or third-party service providers, with whom we engage in business or whose services or products we elect to use, including cloud services hosted in international jurisdictions.

We endeavour to enter into written agreements to ensure that other parties comply with our confidentiality and privacy requirements. Personal information may also be disclosed where we have a legal duty or a legal right to do so.

Liberty Two Degrees may share with or receive personal information from parties as set out above, where these parties reside outside of the Republic of South Africa. All operations are required to abide by Liberty Two Degree’s policies, procedures and guidelines, regardless of legislative requirements for data protection in these countries. Such countries include:

- | | |
|------------------|---------------|
| • Lesotho | • Uganda |
| • Swaziland | • South Sudan |
| • eSwatini | • Ghana |
| • Namibia | • Nigeria |
| • Botswana | • Zambia |
| • Tanzania | • Malawi |
| • Kenya | • Mozambique |
| • Mauritius | |
| • European Union | |

5.7. Employee personal information may be received from or provided to:

- Pension / provident funds and/or their trustees
- Medical aid funds

- Recruitment companies
- Credit bureau

5.8. General Description of Information Security Measures

Liberty Two Degrees employs appropriate, reasonable technical and organisational measures to prevent the loss of damage to or unauthorised destruction of personal information and unlawful access to or processing of personal information. These measures include (but are not limited to):

- Firewalls;
- Virus protection software and update protocols;
- Logical and physical access control;
- Secure setup of hardware and software making up our information technology infrastructure; and
- Where third parties are required to process your personal information in relation to the purposes set out in this manual and for other legal requirements, we ensure that they are contractually bound to apply the appropriate security practices.

6. TYPES OF RECORDS HELD BY LIBERTY TWO DEGREES

Liberty Two Degrees maintains records on the following categories and subject matters. However, please note that recording a category or subject matter in this Manual does not imply that a request for access to such records would be granted. All requests for access will be evaluated on a case-by-case basis in accordance with the provisions of the Act.

6.1. Company records

The following are records pertaining to Liberty Two Degree's own affairs:

- Finance and accounting records
- Human Resources;
- Strategy;
- Shareholders;
- Operational records;
- Technology;
- Compliance and Risk;
- Subsidiary;
- Contractors; and
- Directors

6.1.1. Description of the categories of Data Subjects and of the information or categories of information relating held by Liberty Two Degrees.

Categories of data subjects	Categories of information held
Tenants: Natural persons	Names; contact details; physical, email and postal addresses; date of birth; ID number; financial information, tax related information; nationality; race, gender; confidential correspondence, CCTV. FICA documentation as required for KYC.
Tenants: Juristic Persons/Entities	Names of contact persons; name of legal entity; physical, email and postal address and contact details; financial information; registration number; founding documents; tax related information; authorised signatories; beneficiaries; ultimate beneficial owners. FICA documentation as required for KYC.
Tenants: Foreign persons/ Entities	Names; contact details; physical, email and postal addresses, financial information, addresses; date of birth; passport number, tax related information; nationality; gender; confidential correspondence; registration number; founding documents; tax related information; authorised signatories, beneficiaries, ultimate beneficial owners. FICA documentation required for KYC.
Contracted Service Providers: Natural and Juristic Persons/Entities	Names of contact persons; name of legal entity; physical, email and postal address and contact details; financial information; registration number; founding documents; tax related information; authorised signatories, beneficiaries, ultimate beneficial owners.
Employees / Directors / Potential Personnel / Shareholders / Volunteers / Employees' family members / Temporary Staff:	/Gender, pregnancy; marital status; race, age, language, education information; financial information; employment history; ID number; next of kin; children's name, gender, age, physical, email and postal address; /contact details; opinions, criminal behaviour and/or criminal records; /well-being; external commercial interests; medical information; biometric information; banking details, income tax reference number, remuneration and benefit information (including medical aid, pension / provident fund information), details related to employee performance, disciplinary procedures. "Employee" refers to any person who works for or provides services to or on behalf of Liberty Two Degrees and receives or is entitled to receive any remuneration and any other person who assists in carrying out or

	conducting any work or services for Liberty. This includes, without limitation, heads of departments, managers, all permanent, temporary and part-time staff as well as contract workers.
Customers: Natural Persons	Names; contact details; physical, email and postal addresses; date of birth; ID number; nationality; race, gender, GPS data, preferences, CCTV, views and opinions.
Customers: Juristic Persons/Entities	Names of contact persons; name of legal entity; physical, email and postal address and contact details; registration number; authorised signatories, GPS data, preferences, views and opinions.
Website end-users / Application end-users	Names, electronic identification data: IP address; log-in data, cookies, electronic localization data; cell phone details, GPS data.
Wi-Fi end-users	Names, date of birth; ID number, email address, electronic identification data: IP address; log-in data, cookies, electronic localization data; cell phone details, GPS data

6.2. Other Parties

Records are kept in respect of other parties, including without limitation contractors, suppliers, departments, service providers. Alternatively, such other parties may possess records which can be said to belong to Liberty Two Degrees. The following records fall under this category:

- Employee, work or service-related records which are held by another party as opposed to being held by Liberty Two Degrees; and
- Records held by Liberty Two Degrees pertaining to other parties, including financial records, correspondence, contractual records, records provided by the other party, and records third parties have provided about the contractors/suppliers.

6.3. Publicly available records

We set out the records which are already publicly available without a request for access in terms of the Act being necessary. Records that include, but are not limited to, information relating to:

- Annual Integrated Reports
- Environmental, Social and Governance Report
- SENS reports
- Board of Directors information
- Social Media Posts
- Company and Subsidiary Registration number

6.4. Records available in accordance with other legislation

Legislation	Records available in accordance with other legislation
Pension Funds Act 24 of 1956	<ul style="list-style-type: none"> - Membership details (Name and surname, contact number, identity number, phone number, age, address, bank account details) - Contribution records - Member Benefit Statements - Tax applications, directives and certificates (where applicable) - Member choice forms - Member claim forms Beneficiary nomination details - Information furnished to the Fund at claim stage to execute the duties in terms of section 37C of the Pension Funds Act
Medical Schemes Act 131 of 1998	<ul style="list-style-type: none"> - Records provided by a member or defendant. identity number, phone number, age, address, bank account details) - Records provided by a member or defendant to a third party acting for or on behalf of Liberty. - Records provided by a third party. - Records relating to members or defendants. (including but not limited to name and surname, contact number, identity number, passport number, phone number, age, address, bank account details)
Companies Act 61 of 1973	<ul style="list-style-type: none"> - Shareholder Records - Secretarial Records - Audit Records - Banking Records - Directors Details
Employment Equity Act 55 of 1998	Employee name and surname, contact number, identity number, passport number, phone number, age, address, bank account details)

<p>Basic Conditions of Employment Act 75 of 1997</p> <p>Employment Equity Act 55 of 1998.</p>	<ul style="list-style-type: none"> - Family Records (i.e. next of kin name and surname, contact number) - Medical Details - Professional History (Occupation, Qualification) - Demographic details (Age, Income, Gender, Location) - Financial Records (Salary, Banking Details, SARS-related information) - Behavioural data (Criminal checks, performance, disciplinary)
<p>Financial Intelligence Centre Act 38 of 2001</p>	<ul style="list-style-type: none"> - Identity of prospective or existing client and occupation - Ownership and Control Structure of the Client / Entity - Information regarding the business relationship (nature and purpose of business) - The source of income/funds / wealth that the client expects to use during the business relationship - The anticipated level and nature of the activity that is to be undertaken during the business relationship - The nature and extent of the activity / business activity that the client may be involved in
<p>Compensation for Occupational Injuries and Diseases Act 130 of 1993</p>	<ul style="list-style-type: none"> - Record statistics and information regarding the occurrence and causes of accidents and occupational diseases - Employee Identification Details & Documents - Employee to submit to medical examination - A register or other record of wages, time worked, payment for piece work and overtime and all other prescribed particulars, and he shall at all reasonable times produce such register - Any document that is seen as evidence: e.g.; sworn statement
<p>Financial Advisory and Intermediary Services Act 37 of 2002</p>	<ul style="list-style-type: none"> - Clients' identification Details & Document - Demographic records Demographic details (Age, Income, Gender, Location) - Financial records - Records of premature cancellations of transactions or financial products by clients - Records of complaints received together with an indication whether or not any such complaints have been resolved

	<ul style="list-style-type: none"> - Full and proper accounting records - Records of all funds received, and payments made and of all assets, liabilities and financial transactions of the Office
Unemployment Insurance Act 63 of 2001	<ul style="list-style-type: none"> - Address of the business, and any of its branches, of the Employer - The names, identification numbers and monthly remuneration of each of its employees and must state the address at which the employee is employed - Employee Identification Details & Documents - Financial Records (Salary, Banking Details, SARS - The amount of benefits for purposes of section 13(3); - The benefits the applicant is entitled to in terms of section

7. STEPS TO CONSIDER BEFORE SUBMITTING A REQUEST

The following steps must be considered before submitting a request:

7.1. Step 1: Are you requesting your own information?

All Liberty Two Degree's clients are allowed access to their **own information** without having to use the request for access to information procedures as set out in the Promotion of Access to Information Act, including, but not limited to:

- Lease information
- Account information
- Personal Records

All Liberty Two Degree's clients should contact the relevant centre management or department to request access to their **own information**. Please note that there may be administration costs associated with the retrieval of certain types of information records.

7.2. Step 2: Are you entitled to use the Act to request access?

Please take note of section 7(1) of the Act which states:

“This Act does not apply to a record of a public body or a private body if:

- (a) *that record is requested for the purpose of criminal or civil proceedings;*

- (b) *so requested after the commencement of such criminal or civil proceedings, as the case may be; and*
- (c) *the production of or access to that record for the purpose referred to in paragraph (a) is provided for in any other law.”*

If section 7(1) applies, you may not bring a request in terms of this Act. You must use the rules and procedures for the retrieving of information of the relevant legal forum and proceedings you are involved in. Liberty Two Degrees reserves the right to claim all expenses and other damages incurred as a result of a requester submitting a request in contravention of section 7(1).

7.3. Step 3: Does the information requested exist in the form of a record?

Please note that the Act only applies to records that are in existence at the time of us receiving your request. The Act does not compel anyone to create a record which is not yet in existence at the time the request is made. For instance, the Act cannot be used to obtain reasons for a decision taken by Liberty Two Degree's if such reasons are not in the form of a record.

7.4. Step 4: Is the record in the possession or under the control of Liberty Two Degrees?

The Act provides that the record requested must be in our possession or under our control. Therefore, even if a record was created by Liberty Two Degrees or at some point in Liberty Two Degree's possession (but no longer in Liberty Two Degree's control at the time of your request), you must seek access to the record from the party under whose possession or control it is.

8. HOW TO SUBMIT REQUEST FOR ACCESS

Please consider the steps in paragraph 7 above before submitting your request. Once you are satisfied that none of the foregoing prohibitions apply to you, you may proceed to submit a request as follows:

8.1. Request form

Please complete the request form in Annexure 1 to this Manual (the "Request Form"). (together with the relevant request fee which we explain below) to our Information Officer's email address or our physical address. You can send the completed request form as is or under the cover of a separate letterhead.

In the Request Form, you need to provide sufficient information to enable us to adequately identify –

- The record or records requested;
- The identity of the requester,
- Which form of access is required, if the request is granted;
- The postal address, fax number or email address of the requester or describes the right that they have to seek to exercise or protect and

- explains why they need the requested record to exercise or protect that right
- The requester must ensure that the completed form;

We will evaluate and consider all requests we receive in a proper manner, timeously.

8.2. Description of the right

Take care to adequately describe the right which you are seeking to protect or enforce by means of the records requested. Please note that the courts have indicated that access to the records must be “necessary” for the exercise or protection of the right so stated.

It is important to note that Liberty Two Degrees may refuse you access to the records requested if the right is not clearly defined or where the right you claim to seek to exercise or protect does not qualify as a right as contemplated in the Act.

8.3. Representatives

If a request is made on behalf of another person, then the requester must submit proof of the capacity in which the requester is making the request to the reasonable satisfaction of Liberty Two Degrees.

8.4. Illiteracy or disability

If an individual is unable to complete the prescribed form because of illiteracy or disability, such a person may make the request orally.

8.5. Prescribed fees

- (a) The prescribed fees, where applicable, as provided for in paragraph 9.2 below must be paid and proof of payment (e.g. copy of the deposit slip) must be submitted following your request.
- (b) The requester will be notified where the Information Officer requires a deposit (calculated from the access fee).
- (c) You must submit proof of payment before your request can be processed.
- (d) If you qualify for exemption of the payment of any fee, please state the reason for exemption.

9. PRESCRIBED FEES

9.1. The Act provides for two types of fees, namely:

- A request fee, which will be a standard fee; and
- An access fee, which must be calculated by taking into account reproduction costs, search and preparation time and cost, as well as postal costs.

9.2. The requester, other than a *personal requester**, must pay the prescribed R140.00 request fee, following submission of the request and provide a deposit slip as proof of payment which must follow the Request Form.

* 'personal requester' means a requester seeking access to a record containing *personal information*** about the requester.

** "personal information" means information about an identifiable individual, including, but not limited to—

- (a) *information relating to the race, gender, sex, pregnancy, marital status, national, ethnic or social origin, colour, sexual orientation, age, physical or mental health, well-being, disability, religion, conscience, belief, culture, language and birth of the individual;*
- (b) *information relating to the education or the medical, criminal or employment history of the individual or information relating to financial transactions in which the individual has been involved;*
- (c) *any identifying number, symbol or other particular assigned to the individual;*
- (d) *the address, fingerprints or blood type of the individual;*
- (e) *the personal opinions, views or preferences of the individual, except where they are about another individual or about a proposal for a grant, an award or a prize to be made to another individual;*
- (f) *correspondence sent by the individual that is implicitly or explicitly of a private or confidential nature or further correspondence that would reveal the contents of the original correspondence;*
- (g) *the views or opinions of another individual about the individual;*
- (h) *the views or opinions of another individual about a proposal for a grant, an award or a prize to be made to the individual, but excluding the name of the other individual where it appears with the views or opinions of the other individual; and*
- (i) *the name of the individual where it appears with other personal information relating to the individual or where the disclosure of the name itself would reveal information about the individual,*

but excludes information about an individual who has been dead for more than 20 years.

9.3. If the search for and preparation of the record (for disclosure), including an arrangement to make it available in the requested form, requires more than the hours prescribed in the regulations for this purpose, Liberty Two Degrees will request you to pay as a deposit, the prescribed portion of the access fee which would be payable if the request is granted.

9.4. Liberty Two Degrees may withhold a record until the requester has paid the fees as indicated in **Annexure 2**.

9.5. A requester whose request has been granted must pay the applicable access fee for reproduction, 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.

9.6. You may ask for a refund of the deposit if your request for access is refused.

10. CONSIDERING YOUR REQUEST

10.1. Liberty Two Degrees will have deemed to have received your request when all of the requirements in respect of the Act have been met.

10.2. Subject to the provisions in the Act in respect of extension of time periods, Liberty Two Degrees will process the request within 30 days, unless you have stated special reasons which would satisfy Liberty Two Degrees that circumstances dictate that the above time periods not be complied with.

10.3. You will be informed in writing whether access has been granted or denied.

10.4. The main grounds for Liberty Two Degrees to refuse a request for information relate to the:

10.4.1. mandatory protection of the privacy of a third party who is a natural person, which would involve the unreasonable disclosure of personal information of that natural person;

10.4.2 mandatory protection of the commercial information of a third party, if the record contains:

- trade secrets of that third party;
- financial, commercial, scientific or technical information which disclosure could likely cause harm to the financial or commercial interests of that third party; and
- information disclosed in confidence by a third party to Liberty Two Degrees, if the disclosure could put that third party at a disadvantage in negotiations or commercial competition;

10.4.3 mandatory protection of confidential information of third parties if it is protected in terms of any agreement;

10.4.4 mandatory protection of the safety of individuals and the protection of property;

10.4.5 mandatory protection of records which would be regarded as privileged in legal proceedings;

10.4.6 the commercial activities of Liberty Two Degrees, which may include:

- trade secrets of Liberty Two Degrees;
- financial, commercial, scientific or technical information which disclosure could likely cause harm to the financial or commercial interests of Liberty Two Degrees; and
- information which, if disclosed could put Liberty Two Degrees at a disadvantage in negotiations or commercial competition;
- a computer program which is owned by Liberty Two Degrees, and which is protected by copyright; and

10.4.7 the research information of Liberty Two Degrees or a third party, if its disclosure would disclose the identity of Liberty Two Degrees, the researcher or the subject matter of the research and would place the research at a serious disadvantage.

10.5 In addition, we may refuse your request:

10.5.1 if you do not use the correct form;

10.5.2 if you do not comply with the process set out in this manual;

10.5.3 if you do not provide sufficient information on the form, or;

10.5.4 if you delay in providing any additional information, we require from you.

11. REMEDIES AVAILABLE IF LIBERTY TWO DEGREES REFUSED A REQUEST FOR INFORMATION (SECTION 77A)

11.1. Internal Remedies (section 77A(1))

Liberty Two Degrees does not have internal appeal procedures. As such, the decision made by the Information Officer is final, and requestors will have to exercise such external remedies at their disposal if the request for information is refused.

11.2. External Remedies (Section 77A(2))

A requestor that is dissatisfied with the Information Officer's refusal to disclose information, may within 180 days of the decision, submit a complaint to the Information Regulator, or apply to a Court for relief, after exhausting the complaints procedure submitted to the Information Regulator.

Likewise, a third party dissatisfied with the Information Officer's decision to grant a request for information, may within 180 days of notification of the decision, submit a complaint to the Information Regulator, or apply to a Court for relief, after exhausting the complaints procedure submitted to the Information Regulator. For purposes of the Act, the Courts that have jurisdiction over these applications are the Constitutional Court, the High Court, or another court of similar status.

12 ANNEXURE 1: FORM 2 - REQUEST FOR ACCESS TO RECORD

FORM 2

REQUEST FOR ACCESS TO RECORD

[Regulation 7]

NOTE:

1. *Proof of identity must be attached by the requester.*
2. *If requests are made on behalf of another person, proof of such authorisation, must be attached to this form.*

TO: The Information Officer

(Address)

E-mail address:

Fax number:

Mark with an "X"

Request is made in my own name

Request is made on behalf of another person.

PERSONAL INFORMATION	
Full Names	<input type="text"/>

Identity Number			
Capacity in which request is made <i>(when made on behalf of another person)</i>			
Postal Address			
Street Address			
E-mail Address			
Contact Numbers	Tel. (B):		Facsimile:
	Cellular:		
Full names of person on whose behalf request is made <i>(if applicable):</i>			
Identity Number			
Postal Address			

Street Address			
E-mail Address			
Contact Numbers	Tel. (B)		Facsimile
	Cellular		
<p>PARTICULARS OF RECORD REQUESTED</p> <p><i>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. (If the provided space is inadequate, please continue on a separate page and attach it to this form. All additional pages must be signed.)</i></p>			

Description of record or relevant part of the record:	
Reference number, if available	
Any further particulars of record	
TYPE OF RECORD	
<i>(Mark the applicable box with an "X")</i>	
Record is in written or printed form	
Record comprises virtual images <i>(this includes photographs, slides, video recordings, computer-generated images, sketches, etc)</i>	
Record consists of recorded words or information which can be reproduced in sound	
Record is held on a computer or in an electronic, or machine-readable form	

FORM OF ACCESS	
<i>(Mark the applicable box with an "X")</i>	
Printed copy of record <i>(including copies of any virtual images, transcriptions and information held on computer or in an electronic or machine-readable form)</i>	
Written or printed transcription of virtual images <i>(this includes photographs, slides, video recordings, computer-generated images, sketches, etc)</i>	
Transcription of soundtrack <i>(written or printed document)</i>	
Copy of record on flash drive <i>(including virtual images and soundtracks)</i>	

Copy of record on compact disc drive <i>(including virtual images and soundtracks)</i>	
Copy of record saved on cloud storage server	

MANNER OF ACCESS	
<i>(Mark the applicable box with an "X")</i>	
Personal inspection of record at registered address of public/private body <i>(including listening to recorded words, information which can be reproduced in sound, or information held on computer or in an electronic or machine-readable form)</i>	
Postal services to postal address	
Postal services to street address	
Courier service to street address	
Facsimile of information in written or printed format <i>(including transcriptions)</i>	
E-mail of information <i>(including soundtracks if possible)</i>	
Cloud share/file transfer	
Preferred language <i>(Note that if the record is not available in the language you prefer, access may be granted in the language in which the record is available)</i>	

PARTICULARS OF RIGHT TO BE EXERCISED OR PROTECTED

If the provided space is inadequate, please continue on a separate page and attach it to this Form. The requester must sign all the additional pages.

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:

FEES

- a) *A request fee must be paid before the request will be considered.*
- b) *You will be notified of the amount of the access fee to be paid.*
- 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

You will be notified in writing whether your request has been approved or denied and if approved the costs relating to your request, if any. Please indicate your preferred manner of correspondence:

Postal address	Facsimile	Electronic communication
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		<i>(Please specify)</i>

Signed at _____ this ___ day of _ 20 ____

Signature of Requester / person on whose behalf request is made

FOR OFFICIAL USE

<i>Reference number:</i>	
<i>Request received by:</i> <i>(State Rank, Name And Surname of Information Officer)</i>	
<i>Date received:</i>	
<i>Access fees:</i>	
<i>Deposit (if any):</i>	

Signature of Information Officer

13 ANNEXURE 2 : FORM 3 - OUTCOME OF REQUEST AND OF FEES PAYABLE

FORM 3

OUTCOME OF REQUEST AND OF FEES PAYABLE

[Regulation 8] *Note:*

1. *If your request is granted the—*

(a) *amount of the deposit, (if any), is payable before your request is processed; and*

(b) *requested record/portion of the record will only be released once proof of full payment is received.*

2. *Please use the reference number hereunder in all future correspondence.*

Reference number: _____

TO: _____

Your request dated _____, refers.

1. You requested:

Personal inspection of information at registered address of public/private body (<i>including listening to recorded words, information which can be reproduced in sound, or information held on computer or in an electronic or machine-readable form</i>) is free of charge. You are required to make an appointment for the inspection of the information and to bring this Form with you. If you then require any form of reproduction of the information, you will be liable for the fees prescribed in Annexure B.	
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OR

2. You requested:

Printed copies of the information (<i>including copies of any virtual images, transcriptions and information held on computer or in an electronic or machine-readable form</i>)	
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Written or printed transcription of virtual images <i>(this includes photographs, slides, video recordings, computer-generated images, sketches, etc)</i>	
Transcription of soundtrack <i>(written or printed document)</i>	
Copy of information on flash drive <i>(including virtual images and soundtracks)</i>	
Copy of information on compact disc drive <i>(including virtual images and soundtracks)</i>	
Copy of record saved on cloud storage server	

3. To be submitted:

Postal services to postal address	
Postal services to street address	
Courier service to street address	
Facsimile of information in written or printed format <i>(including transcriptions)</i>	
E-mail of information <i>(including soundtracks if possible)</i>	
Cloud share/file transfer	
Preferred language: <i>(Note that if the record is not available in the language you prefer, access may be granted in the language in which the record is available)</i>	

Kindly note that your request has been:

Approved

Denied, for the following reasons:

4. Fees payable with regards to your request:

Item	Cost per A4-size page or part thereof/item	Number of pages/items	Total
Photocopy			
Printed copy			

For a copy in a computer-readable form on:			
(i) Flash drive			
• To be provided by requestor	R40.00		
(ii) Compact disc			
• If provided by requestor	R40.00		
• If provided to the requestor	R60.00		
For a transcription of visual images per A4-size page	Service to be outsourced. Will depend on the quotation of the service provider		
Copy of visual images			
Transcription of an audio record, per A4-size	R24.00		
Copy of an audio record			
(i) Flash drive			
• To be provided by requestor	R40.00		
(ii) Compact disc			
• If provided by requestor	R40.00		
• If provided to the requestor	R60.00		
Postage, e-mail or any other electronic transfer:	Actual costs		
TOTAL:			

5. Deposit payable (if search exceeds six hours):

Yes

No

Hours of search		Amount of deposit <i>(calculated on one third of total amount per request)</i>	
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Bank account details to be provided on receipt of a valid request.

Signed at _____ this _____ day of _____ 20 _____

Information officer

14 ANNEXURE 3:

WHOLLY AND PARTIALLY OWNED SUBSIDIARIES OF LIBERTY TWO DEGREES

Wholly Owned Subsidiaries

2 Degrees Properties (Pty) Limited

STANLIB REIT Fund Managers Proprietary Limited

Associated Juristic Persons

Liberty Group Limited

Liberty Holdings Limited

Standard Bank Group South Africa

15 ANNEXURE 4:

LIBERTY TWO DEGREES – BASIC INFORMATION

Physical Address

3rd Floor, West Office Block
Nelson Mandela Square
Corner Maude and 5th Street
Sandton
2196

Postal Address

Postnet Suite 85
Private Bag X9976
Sandton City
2146

Other contact details

Telephone: +27 11 4485500
Email address: info@liberty2degrees.co.za
Website address: www.liberty2degrees.co.za

Company Registration Number

Registration no: 2018/388909/06

16 DEFINITIONS, ACRONYMS AND ABBREVIATIONS

1.1 Definitions

1.1.1 **“Access fee”** means a fee prescribed for the purposes of section 22(6) or 54(6), as the case may be;

1.1.2 **“Data subject”** means the person to whom personal information relates;

1.1.3 **“Deputy Information Officer”** means the designated individual in the public or private body who is responsible for assisting the Information Officer with the PAIA Request;

1.1.4 **“Guide”** means the guide on how to use PAIA by any person who wishes to exercise any right contemplated in Promotion of Access to Information Act 2 of 2000 (PAIA) and the Protection of Personal Information Act 04 of 2013, as contemplated in section 10 of PAIA;

1.1.5 **“Head”** of, or in relation to, a private body means -

(a) in the case of a natural person, including a person referred to in paragraph (c) of the definition of “political party”, that natural person or any person duly authorised by that natural person;

(b) in the case of a partnership, any partner of the partnership or any person duly authorised by the partnership;

(c) in the case of a juristic person -

(i) the chief executive officer or equivalent officer of the juristic person or any person duly authorised by that officer; or

(ii) the person who is acting as such or any person duly authorised by such acting person; or

(d) in the case of political party, the leader of the political party or any person duly authorised by that leader;

1.1.6 **“Information Officer”**

In relation to, a public body -

(a) in the case of a national department, provincial administration or organisational component -

(i) mentioned in Column 1 of Schedule 1 or 3 to the Public Service Act, 1994 (Proclamation 103 of 1994), means the officer who is the incumbent of the post bearing the designation mentioned in Column 2 of the said Schedule 1 or 3 opposite the name of the relevant national department, provincial administration or organisational component or the person who is acting as such; or

(ii) not so mentioned, means the Director-General, head, executive director or equivalent officer, respectively, of that national department, provincial administration or organisational component, respectively, or the person who is acting as such;

(b) in the case of a municipality, means the municipal manager appointed in terms of section 82 of the Local Government: Municipal Structures Act, 1998 (Act 117 of 1998), or the person who is acting as such; or

in the case of any other public body, means the chief executive officer,

(c) or equivalent officer, of that public body or the person who is acting as such;

In relation to, a private body-

(d) means the head of a private body as contemplated in section 1, of the Promotion of Access to Information Act;

1.1.7 “**Information Regulator**” means the Information Regulator established in terms of section 39 of the Protection of Personal Information Act, 2013;

1.1.8 “**Internal appeal**” means an internal appeal to the relevant authority in terms of section 74;

1.1.9 “**Person**” means a natural person or a juristic person;

1.1.10 “**Personal information**” means information relating to an identifiable natural person, including,

but not limited to -

(a) information relating to the race, gender, sex, pregnancy, marital status, national, ethnic or social origin, colour, sexual orientation, age, physical or mental health, well-being, disability, religion, conscience, belief, culture, language and birth of the person;

(b) information relating to the education or the medical, financial, criminal or employment history of the person;

(c) any identifying number, symbol, email address, physical address, telephone number, location information, online identifier or other particular assigned to the person;

(d) the biometric information of the person;

(e) the personal opinions, views or preferences of the person;

(f) correspondence sent by the person that is implicitly or explicitly of a private or confidential nature or further correspondence that would reveal the contents of the original correspondence;

(g) the views or opinions of another individual about the person; and

- (h) the name of the person if it appears with other personal information relating to the person or if the disclosure of the name itself would reveal information about the person, but excludes information about an individual who has been dead for more than 20 years;

1.1.11 **“Political party”** means -

- (a) any entity that accepts donations principally to support or oppose any registered political party or its candidates, in an election as defined in section 1 of the Electoral Act, 1998 (Act No. 73 of 1998);
- (b) any registered political party as defined in the Electoral Act, 1998; or
- (c) a natural person who is an independent candidate.

1.1.12 **“Private body”** means -

- (a) a natural person who carries or has carried on any trade, business or profession, but only in such capacity;
- (b) a partnership which carries or has carried on any trade, business or profession; or
- (c) any former or existing juristic person; or
- (d) a political party

but excludes a public body;

1.1.13 **“Public body”** means -

- (a) any department of state or administration in the national or provincial sphere of government or any municipality in the local sphere of government; or
- (b) any other functionary or institution when
 - (i) exercising a power or performing a duty in terms of the Constitution or a provincial constitution; or
 - (ii) exercising a public power or performing a public function in terms of any legislation;

1.1.14 **“Record”** of, or in relation to, a public or private body, means any recorded information -

- (a) regardless of form or medium;
- (b) in the possession or under the control of that public or private body, respectively; and
- (c) whether or not it was created by that public or private body, respectively;

1.1.15 **“Request for access”**, in relation to -

- (a) a public body, means a request for access to a record of a public body in terms of section 11; or

- (b) a private body, means a request for access to a record of a private body in terms of section 50;

1.1.16 “**Request for access**”, in relation to -

- (a) a public body, means
 - (i) any person (other than a public body contemplated in paragraph

(a) or (b)(i) of the definition of 'public body', or an official thereof) making a request for access to a record of that public body; or

- (ii) a person acting on behalf of the person referred to in subparagraph (i);

- (b) a public body, means

- (i) any person, including, but not limited to, a public body or an official thereof, making a request for access to a record of that private body; or

- (ii) a person acting on behalf of the person contemplated in subparagraph(i);

1.1.17 “**Responsible party**” means a public or private body or any other person which, alone or in conjunction with others, determines the purpose of and means for processing personal information;

1.1.18 “**Third party**”, in relation to a request for access to -

- (a) a record of a public body, means any person (including, but not limited to, the government of a foreign state, an international organisation or an organ of that government or organisation) other than -

- (i) the requester concerned; and

- (ii) a public body; or

- (b) a record of a private body, means any person (including, but not limited to, a public body) other than the requester,

but, for the purposes of sections 34 and 63, the reference to 'person' in paragraphs (a) and (b) must be construed as a reference to 'natural person';

1.1.19 “**The Act**” means the Promotion of Access to Information Act 2 of 2000 as amended, and includes any regulation made and in force in terms of section 92.

1.2 LIST OF ACRONYMS AND ABBREVIATIONS

Constitution	Constitution of the Republic of South Africa, Act No. 108 of 1996
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DIO	Deputy Information Officer
IO	Information Officer
PAIA	Promotion of Administrative Justice Act, 2000
POPIA	Protection of Personal Information Act No. 4 of 2013
Regulator	Information Regulator

17 VERSION HISTORY

Version no.	Purpose of revision	Review date
V1	Initial PAIA Information Manual	May 2021
V2	Updates to PAIA Information Manual	October 2023