



PAIA MANUAL
[PUBLIC DOCUMENT]

1. INTRODUCTION

Exemplar REITail Limited (“**Exemplar**”) and its subsidiaries (individually or collectively, as the context may require, the “**Exemplar Group**”) are market leaders in the development, ownership and management of rural and township retail real estate in South Africa.

2. PURPOSE, SCOPE AND OBJECTIVES

This manual was prepared in accordance with section 51 of the Promotion of Access to Information Act 2 of 2000 (“**PAIA**”) and applies to the Exemplar Group. PAIA gives effect to the right of access to information contemplated in section 32 of the Constitution of the Republic of South Africa, 1996. This manual provides guidance on the categories of records held by the Exemplar Group and the manner in which access to such records may be requested.

3. DEFINITIONS

3.1 “commercial information” means information which -

- contains trade secrets of a private body;
- contains financial, commercial, scientific or technical information, other than trade secrets, of a private body, the disclosure of which would be likely to cause harm to the commercial or financial interests of such private body;
- is a computer program, owned by a private body, except insofar as it is required to give access to a record to which access is granted in terms of PAIA;
- contains information, the disclosure of which could reasonably be expected -
 - to put a private body at a disadvantage in contractual or other negotiations; or
 - to prejudice such private body in commercial competition.

3.2 “head” of, or in relation to a private body, means –

- in the case of a juristic person –
 - the chief executive officer or equivalent officer of the juristic person or any person duly authorised by that officer, or the person who is acting as such or any person duly authorised by such acting person.

3.3 “personal requester” means a requester seeking access to a record containing personal information about the requester (in other words, the information is about the requester in his or her or its personal capacity).

3.4 “private body” means –

- a natural person who carries on or has carried on any trade, business or profession, but only in such capacity;

- a partnership which carries on or has carried on any trade, business or profession; or
 - any (former or existing) juristic person which carries on or has carried on any trade, business or profession,
- but excludes a public body.

3.5 “**record**” of, or in relation to, a public or private body, means any recorded information –

- regardless of form or medium;
- in the possession or under the control of that public or private body, as the case may be; and
- whether or not it was created by that public or private body.

4. CONTACT PARTICULARS

Name of businesses and registration numbers –

- Exemplar REITail Limited (registration number: 2018/022591/06)
- Exemplar Leasing Proprietary Limited (registration number: 2019/166664/07)
- Exemplar Utilities Proprietary Limited (registration number: 1999/016043/07)
- Exemplar Management Proprietary Limited (registration number: 2024/027255/07)

Physical address: 204 Von Willich Avenue
Clubview, Centurion
0014

Postal address: PO Box 12196
Clubview
0157

Telephone number: 012 660 3020

Information officer: Ananda Booysen

Email address: ananda@expreit.co.za

Website address: www.exemplarreit.co.za

Head of business: Jason McCormick

5. GUIDE ON HOW TO USE PAIA

A guide on how to use PAIA, as provided for in section 10 of PAIA, is available from the Information Regulator, as well as at the following link:

https://infoeregulator.org.za/wp-content/uploads/2020/07/PAIA-Guide-English_20210905.pdf

This guide is available in all official languages and may be obtained free of charge from the Information Regulator.

Information Regulator:

Website: <https://inforegulator.org.za/>
 Postal Address: PO Box 31533
 Braamfontein
 Johannesburg
 2017
 Physical Address: Woodmead North Office Park
 54 Maxwell Drive
 Woodmead
 Johannesburg
 2191
 Telephone: 010 023 5200
 Email: enquiries@inforegulator.org.za

Should your PAIA request be denied or there is no response for access to records, you may use the following email address to lodge a complaint: PAIAComplaints@inforegulator.org.za

6. RIGHT OF ACCESS TO A RECORD

A requester of information must be given access to any record of a private body if -

- that record is required for the exercise or protection of any rights of the requester of the information;
- such requester complies with the procedural requirements of PAIA relating to a request for access to that record; and
- access to that record is not refused in terms of any permissible ground for refusal, as contained in paragraph 12 of this manual.

7. VOLUNTARY DISCLOSURE AND RECORDS AUTOMATICALLY AVAILABLE

The following categories of records are available without a person having to submit a formal request under PAIA:

- information published on the Exemplar Group's website, including corporate information, announcements, reports, policies and contact information;

- the Exemplar Group’s PAIA Manual and Privacy Policy; and
- marketing and promotional material made available to the public.

8. FACILITATION OF A REQUEST FOR ACCESS TO INFORMATION

- 8.1 A request for information may include a request for access to a record containing personal information (as defined in the Protection of Personal Information Act no 4 of 2013 (“**POPIA**”)) about the requester or the person on whose behalf the request is made.
- 8.2 A request for access to a record must be submitted on the prescribed PAIA Form 2 and must contain sufficient particulars to enable the Exemplar Group to identify the requester, the record requested, the form and manner of access required and the right that the requester seeks to exercise or protect, together with an explanation of why the requested record is required for that purpose.
- 8.3 A request for access to a record must be made using Form 2 prescribed under the PAIA Regulations, which is available from the Information Regulator at the link contained in paragraph 8.6.
- 8.4 The request must identify the company within the Exemplar Group to which it relates and must be submitted to the Information Officer using the contact details set out in paragraph 4.
- 8.5 The prescribed form 2 on which the request is made must at least contain the following information:
- Personal information of the requester;
 - Type of record requested;
 - Which form of access is required;
 - The manner of access; and
 - Particulars of the right to be exercised or protected.
- 8.6 A copy of the prescribed form 2 to be completed for submitting a request is available from Exemplar or the Information Regulator (at the following link: <https://inforegulator.org.za/paia-forms/>).

9. FEES IN TERMS OF A REQUEST FOR ACCESS TO INFORMATION

9.1 The head of Exemplar or the Exemplar Group to whom a request for access to information is made shall require the requester to pay the prescribed request fee (if any) before processing the request. The prescribed fees payable are as follows:

Item	Description	Fees
1	The request fee payable by a requester other than a personal requester	R140.00
2	Photocopy/printed black & white of an A4-size page or part thereof	R2.00 p/page
3	Printed copy of an A4-size page	R2.00 p/page
4	For a copy in a computer-readable form on: Flash drive / USB (to be provided by requester) Compact Disc (CD) - If provided by requester - If provided to the requester	R40.00 R40.00 R60.00
5	For a transcription of visual images per A4-size page	Service to be outsourced – will depend on quotation from service provider
6	Copy of visual images	
7	Transcription of an audio record per A4-size page	R24.00
8	Copy of an audio record on: Flash drive / USB (to be provided by requester) Compact Disc (CD) - If provided by requester - If provided to the requester	R40.00 R40.00 R60.00
9	To search for and prepare the record for disclosure - for each hour or part of an hour, excluding the first hour, reasonably required for such search and preparation. To not exceed a total cost of	R145.00 R435.00
10	Deposit: if search exceeds 6 hours	One third of amount per request calculated in terms of items 2 to 8
11	Postage, email or any other electronic transfer	Actual cost

- 9.2 If, after a request for a record from the Exemplar Group, the search for such record has been made and the preparation of the record for disclosure would, in the opinion of the head of the relevant company within the Exemplar Group, require more than six hours, the head of the relevant company within the Exemplar Group shall by notice require the requester to pay as a deposit the prescribed portion (being not more than one third) of the prescribed fee which would be payable if the request were to be granted (as per 9.1).
- 9.3 If a deposit has been paid in respect of a request for access which is refused, the head of the relevant company within the Exemplar Group shall repay the deposit to the requester (free of interest).
- 9.4 The head of the relevant company within the Exemplar Group may withhold a record until the requester concerned has paid the applicable fees (if any).
- 9.5 A requester whose request for access to a record of Exemplar has been granted, must pay an access fee for reproduction/copies of a record and for search and preparation, respectively, and for any time reasonably required in excess of the prescribed hours to search for and prepare the record for disclosure.

10. INFORMATION AVAILABLE IN TERMS OF PAIA

- 10.1 A requester may apply, on the prescribed form and in accordance with the procedure set out in this manual, for access to the following categories of records:
- personnel records, including employment contracts, disciplinary records and payroll information;
 - customer and business-partner records, including applications, contact details, contracts, correspondence and financial records relating to tenants, landlords, service providers and other business partners of the Exemplar Group;
 - Exemplar Group records, including corporate, business, property, development, leasing, management, marketing, financial, legal, regulatory and information technology records;
 - recruitment and candidate records, including candidate profiles, curricula vitae, supporting documents, employment preferences and related communications; and
 - third-party records in the possession or under the control of the Exemplar Group.
- 10.2 Access to a record may or must be refused only on a ground contemplated in PAIA, including the grounds summarised in paragraph 12. Where only part of a record is subject to a ground of refusal, any part that can reasonably be severed will be disclosed in accordance with section 73 of PAIA.

11. INFORMATION AVAILABLE IN TERMS OF OTHER LEGISLATION

Certain information or records may be requested from the Exemplar Group and must be made available in terms of laws other than PAIA, such as the following -

- Basic Conditions of Employment Act 75 of 1997
- Companies Act 71 of 2008
- Employment Equity Act 55 of 1998
- Income Tax Act 58 of 1962
- Occupational Health and Safety Act 85 of 1993
- South African Revenue Service Act 34 of 1997
- Skills Development Levies Act 9 of 1999
- Unemployment Insurance Contributions Act 4 of 2002
- Value Added Tax Act 89 of 1991
- Financial Intelligence Centre Act 38 of 2001
- Broad-based Black Economic Empowerment Act 53 of 2003
- Protection of Personal Information Act 4 of 2013
- Labour Relations Act 66 of 1995
- Unemployment Insurance Act 63 of 2001

Records available in accordance with applicable legislation may include statutory registers, incorporation and governance records, employment and payroll records, tax and accounting records, health and safety records, regulatory registrations, policies and other records required to be maintained or disclosed under the applicable legislation. Access to any such record remains subject to the requirements of the relevant legislation and, where applicable, PAIA.

12. GROUNDS FOR REFUSAL TO ACCESS TO RECORDS

The Exemplar Group may legitimately, in terms of chapter 4 of PAIA, refuse a request for information on, inter alia, any of the following grounds:

- Protection of personal information, including the right to privacy of the Exemplar Group, any employee of the Exemplar Group, or any third party, in order to avoid the unreasonable disclosure of personal information concerning that person. Any refusal on this ground will be determined in accordance with the applicable provisions of PAIA;
- Protection of the commercial information of the Exemplar Group, any company within the Exemplar Group, or a third party;

- Protection of confidential information of third parties if disclosure would constitute an action for breach of a duty of confidence owed to that third party in terms of any agreement or legislation;
- Protection of the safety of individuals or the protection of property;
- Protection of records which would be privileged from production in legal proceedings;
- Protection of the Exemplar Group's commercial activities including but not limited to records that contain trade secrets, financial, commercial, customer, scientific or technical information, the disclosure of which would be likely to cause harm to the Exemplar Group's commercial or financial interests;
- Protection of research information of the Exemplar Group or a third party, if disclosure would expose the identity of the Exemplar Group or the third party, the researcher or the subject matter of the research to serious disadvantage; or
- Requests for information that are, in the Exemplar Group's reasonable opinion, manifestly frivolous or vexatious or which involve an unreasonable diversion of resources.

13. RECORDS THAT DO NOT EXIST OR CANNOT BE FOUND

If all reasonable steps have been taken to locate a requested record and there are reasonable grounds for believing that the record does not exist or cannot be found, the head of the relevant private body will, by affidavit or affirmation, notify the requester accordingly and provide full details of the steps taken to locate the record. If the record is subsequently found, access will be given to the requester unless access may or must be refused on a ground contemplated in PAIA.

14. PROCESSING OF PERSONAL INFORMATION

14.1 Purposes of processing

The Exemplar Group processes personal information for purposes connected with its business operations, including property development, ownership and management; leasing and tenant administration; the provision and receipt of services; employment and human resources administration; legal, regulatory and financial compliance; due diligence and risk management; communications and recordkeeping; and facilitating recruitment and employment opportunities.

14.2 Categories of data subjects and personal information

The Exemplar Group may process personal information relating to employees and job applicants; tenants and prospective tenants; directors, representatives and sureties of tenants; landlords, property owners, shareholders and business partners; contractors,

suppliers and professional advisers; job applicants and other candidates; representatives of tenants and other business partners. The information processed may include identification and contact details, financial and banking information, employment and educational information, curricula vitae, qualifications, skills, references, employment preferences, contractual and correspondence records, due diligence information and online identifiers or access records.

14.3 Recipients

Personal information may be supplied to other companies in the Exemplar Group where reasonably necessary; landlords and property owners; prospective employers or other authorised recipients for recruitment purposes; banks, credit bureaus and verification providers; professional advisers, auditors and insurers; contracted operators and service providers; and regulators, public authorities or other persons where disclosure is required or permitted by law.

14.4 Transborder flows

The Exemplar Group does not presently plan to transfer personal information outside South Africa. Should such transfer become necessary, it will take place only in accordance with section 72 of POPIA.

14.5 Security safeguards

The Exemplar Group implements appropriate, reasonable technical and organisational safeguards to protect personal information, including physical and electronic access controls, password protection, encryption where appropriate, anti-virus and firewall protection, secure backups, user-access management, confidentiality obligations, risk assessments and periodic reviews of its information security safeguards.

15. DIRECT MARKETING

The Exemplar Group will process personal information for purposes of direct marketing by means of unsolicited electronic communications only where permitted by section 69 of POPIA, including where the data subject has consented or where the requirements applicable to an existing customer have been satisfied. Consent may be obtained in any manner reasonably accessible to the data subject. An objection or opt-out will not constitute consent.

16. CORRECTION, DESTRUCTION OR DELETION OF PERSONAL INFORMATION

A data subject may request, free of charge, the correction or deletion of personal information that is inaccurate, irrelevant, excessive, out of date, incomplete, misleading or obtained unlawfully, or the destruction or deletion of a record that the Exemplar Group is no longer authorised to retain. A request may be made using Form 2 of the POPIA Regulations or by any manner reasonably accessible to the data subject. The Exemplar Group will notify the data subject in writing of the action taken within 30 days of receiving the request.

17. AVAILABILITY OF PAIA MANUAL

A copy of this manual is available for inspection, free of charge, at the offices of the Exemplar Group, and may be downloaded from Exemplar's website (www.exemplarreit.co.za).

18. REMEDIES AVAILABLE

A requester or third party who is dissatisfied with a decision of the head of a private body, or where no decision has been communicated within the period prescribed by PAIA, may lodge a complaint with the Information Regulator using PAIA Form 5 prescribed under regulation 10 of the PAIA Regulations, or may apply to a court for appropriate relief in accordance with PAIA. A complaint may be submitted to the Information Regulator at PAIAComplaints@inforegulator.org.za or through the Regulator's prescribed online process.

19. UPDATING OF MANUAL

This policy was approved and will be reviewed at least annually, or whenever there is a material change in the law or in the manner in which personal information is processed by the Exemplar Group.



Duncan Church: CFO

For: Exemplar REITail Limited