



PAIA & POPIA MANUAL

Promotion of Access to Information Act, 2000 & Protection of Personal Information Act, 2013

MALDEV PROPERTIES

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CONFIDENTIAL CORPORATE DOCUMENT

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1. INTRODUCTION

1.1 Purpose of this Manual

This Promotion of Access to Information Act and Protection of Personal Information Act Manual ("the Manual") is published by MALDEV PROPERTIES ("the Company", "Maldev", "we", "us" or "our") in compliance with section 51 of the Promotion of Access to Information Act, 2000 (Act No. 2 of 2000) ("PAIA") and section 51 of the Protection of Personal Information Act, 2013 (Act No. 4 of 2013) ("POPIA").

The Manual is intended to assist members of the public, clients, tenants, suppliers, employees, prospective employees, funders, regulators and other stakeholders ("requesters" and "data subjects") in exercising their rights under PAIA and POPIA, including the right to request access to records held by the Company and the right to know how their personal information is collected, used, stored and protected.

This Manual consolidates, into a single reference document, the information which the Company is obliged to make available under both statutes. It is drafted in accordance with the guidelines issued by the Information Regulator of South Africa and reflects legislation in force as at the date of issue.

1.2 Objectives

- To describe the records held by the Company and the categories of records available with or without a formal request;
- To identify the Information Officer and Deputy Information Officer(s) responsible for administering requests and ensuring compliance with PAIA and POPIA;
- To explain the procedure, forms and fees applicable to a request for access to a record;
- To set out the grounds upon which a request for access may be refused;
- To describe how the Company processes personal information as a responsible party under POPIA, including the purpose, lawful basis, security safeguards and retention periods applicable to such processing;
- To explain the rights of data subjects under POPIA and the manner in which those rights may be exercised; and
- To provide requesters and data subjects with the internal and external remedies available to them, including recourse to the Information Regulator.

1.3 Legislative Framework

This Manual is prepared with reference to the following legislation, regulations and guidance, as amended and applicable as at 2026:

- The Constitution of the Republic of South Africa, 1996, in particular section 32 (access to information) and section 14 (privacy);
- The Promotion of Access to Information Act, 2000 (Act No. 2 of 2000) and the Regulations issued thereunder;
- The Protection of Personal Information Act, 2013 (Act No. 4 of 2013) and the Regulations issued thereunder;
- The forms prescribed by the Minister of Justice and Correctional Services under PAIA (Forms 1 to 5 of Annexure B);

- The Guidelines and Codes of Good Practice issued from time to time by the Information Regulator of South Africa; and
- The Companies Act, 2008 (Act No. 71 of 2008), to the extent relevant to the Company's constitution and governance.

In the event of any conflict between this Manual and the applicable legislation, the legislation shall prevail. The Company reserves the right to amend this Manual from time to time to reflect legislative developments, regulatory guidance, or changes to its own operations.

2. DEFINITIONS

Unless the context indicates otherwise, the following terms bear the meanings assigned to them below, consistent with the definitions in section 1 of PAIA and section 1 of POPIA:

2.1 PAIA Definitions

“Information Officer” the person designated under section 1 of PAIA and section 1 of POPIA, being, in the case of a private body, the head of that body, who is responsible for encouraging compliance with PAIA and POPIA within the Company.

“Private body” means, for the purposes of PAIA, a company as contemplated in the Companies Act, 2008, and includes MALDEV PROPERTIES.

“Public body” a national or provincial department, municipality, or other body exercising a public power or performing a public function in terms of legislation.

“Record” any recorded information, regardless of form or medium, including in written, printed, electronic, photographic or other form, in the possession or under the control of the Company, whether or not it was created by the Company.

“Requester” a person, including a juristic person, who requests access to a record of the Company in accordance with PAIA.

“Third party” in relation to a request for access, any person other than the requester or the Company.

“Commercial information” trade secrets, financial, commercial, scientific or technical information, the disclosure of which would be likely to cause harm to the commercial or financial interests of the Company or a third party.

2.2 POPIA Definitions

“Data subject” the person to whom personal information relates, including natural persons and, where applicable, juristic persons.

“Personal information” information relating to an identifiable, living natural person and, where applicable, an identifiable, existing juristic person, including but not limited to information relating to race, gender, marital status, national origin, age, physical or mental health, education, identifying number, contact details, biometric information, financial history, and correspondence.

“Special personal information” personal information concerning a data subject's religious or philosophical beliefs, race or ethnic origin, trade union membership, political persuasion, health or sex life, biometric information, or criminal behaviour, the processing of which is subject to additional restrictions under section 26 of POPIA.

“Processing” any operation or activity concerning personal information, including collection, receipt, recording, organisation, storage, updating, retrieval, dissemination, merging, linking, restriction, degradation, erasure or destruction of information.

“Responsible party” a public or private body which, alone or in conjunction with others, determines the purpose of and means for processing personal information. The Company is the responsible party in respect of the personal information it processes.

“Operator” a person who processes personal information for a responsible party in terms of a contract or mandate, without coming under the direct authority of that party.

“Consent” any voluntary, specific and informed expression of will in terms of which permission is given for the processing of personal information.

“Information Regulator” the regulator established in terms of section 39 of POPIA, with jurisdiction over the enforcement of both POPIA and PAIA.

“Direct marketing” the approach, whether in person, by mail, or electronic communication, of a data subject for the purpose of promoting or offering to supply goods or services.

“Cross-border transfer” the transfer of personal information to a third party in a foreign country, which is subject to the conditions set out in section 72 of POPIA.

3. COMPANY INFORMATION

3.1 Registered Details

Field	Detail
Registered Name	MALDEV PROPERTIES
Registration Number	2026/595870/07
Nature of Entity	Private company incorporated under the Companies Act, 2008
Website	www.maldev.co.za
Email Address	info@maldev.co.za
General Enquiries	076 168 9513 015 110 1640

3.2 Business Description

MALDEV PROPERTIES is a South African property group engaged in the development, management and operation of residential, commercial and institutional real estate. The Company's activities span the full property lifecycle, from land acquisition and development through to long-term asset and facilities management.

3.3 Nature of Business

In the ordinary course of its business, the Company collects, holds and processes records relating to clients, tenants, suppliers, contractors, employees, students and members of the public. These records include personal information as defined in POPIA and are processed strictly for the purposes described in this Manual.

3.4 Business Units

The Company conducts its operations through the following principal business units:

- Property Development : the planning, design and construction of residential, commercial and mixed-use developments;
- Property Management : the day-to-day management of let properties, including tenant administration, lease management and rent collection;
- Facilities Management : the maintenance, security, cleaning and technical management of buildings and grounds on behalf of owners and occupiers;
- Student Accommodation : the provision and management of purpose-built student housing, including tenant placement and residence administration.

4. CONTACT DETAILS

4.1 Information Officer

The Information Officer of the Company, appointed in terms of section 1 of PAIA and section 1 of POPIA and registered with the Information Regulator, is responsible for dealing with requests for access to records, ensuring compliance with the conditions for lawful processing of personal information, and serving as the point of contact for the Information Regulator.

Designation	Detail
Title	Information Officer
Company	MALDEV PROPERTIES
Postal Address	PO Box, to be confirmed : refer to www.maldev.co.za for current postal address
Physical Address	Refer to www.maldev.co.za for the current registered physical address
Telephone	076 168 9513
Email	info@maldev.co.za

4.2 Deputy Information Officer

Where the Company designates one or more Deputy Information Officers in terms of section 56 of POPIA to assist the Information Officer in the performance of their functions, the identity and contact details of such Deputy Information Officer(s) will be recorded in the Company's internal compliance register and made available on request through the contact details set out above.

4.3 General Company Contact Details

Detail	Information
Website	www.maldev.co.za
Email	info@maldev.co.za
General Enquiries	076 168 9513 / 015 110 1640

5. GUIDE PUBLISHED BY THE INFORMATION REGULATOR

In terms of section 10 of PAIA, the Information Regulator is required to publish, in each official language, a guide containing information reasonably required by a person who wishes to exercise a right of access to a record contemplated in PAIA. The guide describes, amongst other matters, the objects of PAIA, the manner and form of a request for access to a record, and the assistance available from the Information Regulator in this regard.

The guide is available from the Information Regulator at the contact details below, and copies may also be obtained, on request, from the Company's Information Officer.

- Physical Address: JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001
- Postal Address: PO Box 31533, Braamfontein, Johannesburg, 2017
- Telephone: 010 023 5200
- Email: enquiries@infoeregulator.org.za
- Website: www.justice.gov.za/infoereg

6. RECORDS AVAILABLE WITHOUT A REQUEST

In accordance with section 52 of PAIA, certain categories of records held by the Company are made available to the public without the need to lodge a formal request under PAIA. These records are made available free of charge through the Company's website, offices, or on request from the Information Officer, and include:

- General marketing and promotional material describing the Company and its services;
- Corporate brochures and development profiles;
- Content published on the Company's website, www.maldev.co.za;
- Current vacancy advertisements and recruitment notices;
- Property and unit listings available for sale, lease or occupation;
- Public notices, including notices relating to body corporate or tenant matters where the Company is required by law to publish such notices; and
- This Manual and any other document which the Company elects to publish generally.

Requesters are encouraged to consult these sources before lodging a formal request, as this may enable a faster response and avoid the need to pay the fees described in section 11 of this Manual.

7. RECORDS AVAILABLE ON REQUEST

The records described in this section may be requested in terms of the procedure set out in section 10 of this Manual. Inclusion of a category of record in this section does not constitute an undertaking that access will be granted; every request is considered on its merits with reference to the grounds for refusal set out in section 12 of this Manual, and, where applicable, the corresponding provisions of POPIA relating to the personal information of third parties.

7.1 Corporate Governance

- Memorandum of Incorporation and constitutional documents;
- Certificate of Incorporation and company registration records;
- Minutes of shareholder and director resolutions, to the extent not privileged or confidential;
- Company policies of general application.

7.2 Financial Records

- Annual financial statements;
- Budgets, management accounts and financial reports, subject to commercial confidentiality;
- Banking and treasury records relevant to a specific, lawful request;
- Tax and statutory compliance records, to the extent permitted by law.

7.3 Human Resources

- Employment policies, codes of conduct and workplace procedures;
- Employment equity and skills development reports, in aggregate or de-identified form;
- Records relating to an individual's own employment, obtainable by that employee subject to internal HR procedure.

7.4 Property Management

- Property management agreements and mandates, subject to confidentiality provisions;
- Rental schedules and standard lease terms;
- Body corporate and management association records, where the Company acts as managing agent.

7.5 Student Accommodation

- Residence rules and codes of conduct;
- Standard accommodation agreements and application forms;
- Occupancy and allocation policies.

7.6 Facilities Management

- Facilities management service level agreements, subject to confidentiality;
- Planned maintenance schedules and building compliance certificates;

- Service reports relevant to a specific, lawful request.

7.7 Procurement and Contracts

- Supplier registration and procurement policies;
- Standard form contracts and tender documentation, subject to commercial confidentiality;
- Records of supplier registration outcomes relevant to the requesting supplier.

7.8 Lease Agreements

- Standard lease agreement templates;
- A party's own lease agreement and related correspondence, obtainable by that party.

7.9 Maintenance Records

- Planned and reactive maintenance logs relevant to a specific property or request;
- Maintenance service reports and completion certificates.

7.10 Health and Safety

- Occupational Health and Safety Act compliance records;
- Incident and injury registers, in de-identified or aggregate form where third-party personal information is involved;
- Health and safety policies and risk assessments.

7.11 Legal and Compliance

- Records relating to litigation, disputes or regulatory matters, subject to legal professional privilege;
- Compliance registers and regulatory correspondence, subject to applicable exemptions;
- Records of statutory registrations and licences.

7.12 Insurance

- Insurance policy schedules relevant to a specific property or asset;
- Claims records relevant to the requesting party's own claim.

7.13 Supplier Records

- Supplier registration forms and outcome correspondence, obtainable by the relevant supplier;
- Supplier compliance and vetting records, subject to confidentiality.

7.14 Tenant Records

- A tenant's own lease file, account statements and correspondence, obtainable by that tenant;
- Building rules and tenant handbooks.

7.15 Client Records

- A client's own transaction records and correspondence, obtainable by that client;
- Sales and marketing agreements relevant to the requesting client.

7.16 Information Technology Records

- IT security and acceptable use policies;
- System access records relevant to a specific, lawful request, subject to security considerations.

7.17 Risk Management

- Enterprise risk management policies and frameworks;
- Risk registers, in de-identified or aggregate form where appropriate.

8. PROCESSING OF PERSONAL INFORMATION

The Company is a responsible party as defined in POPIA in respect of the personal information it collects and processes in the course of its business. This section describes that processing in accordance with section 51(1)(d) and (e) of POPIA.

8.1 Purpose of Processing

The Company processes personal information for purposes which include the following:

- Concluding and administering lease, sale, service and supply agreements;
- Managing tenant, client and supplier relationships, including billing, account administration and dispute resolution;
- Allocating and administering student accommodation, including application, screening and residence management;
- Recruiting, employing and managing personnel, including payroll, benefits and performance management;
- Ensuring the safety and security of persons and property at the Company's developments and managed sites;
- Complying with legal, regulatory, tax and statutory obligations;
- Marketing the Company's developments and services, subject to the data subject's right to object described in this section; and
- Maintaining the Company's own governance, risk management and internal record-keeping.

8.2 Categories of Information Subjects

The Company processes personal information relating to the following categories of data subjects:

- Prospective, current and former tenants and residents;
- Prospective, current and former clients and purchasers;
- Prospective, current and former employees, and job applicants;
- Students occupying Company-managed accommodation;
- Suppliers, contractors and their representatives; and
- Visitors to, and other individuals present at, the Company's premises and managed sites.

8.3 Categories of Personal Information

Depending on the nature of the relationship, the Company may process the following categories of personal information:

- Identifying information, such as full names, identity or passport numbers, and date of birth;
- Contact information, such as postal and physical addresses, telephone numbers and email addresses;
- Financial information, such as banking details, payment history and credit information, where relevant to a lease, sale or employment relationship;

- Employment information, such as employment history, qualifications and remuneration, in respect of employees and job applicants;
- Property and occupancy information, such as lease terms, unit allocations and occupancy history;
- CCTV and access control information, where security systems are deployed at Company premises; and
- Special personal information, such as health information relevant to workplace accommodation or emergency response, which is processed only where a ground under section 27 of POPIA applies, such as the data subject's consent, or where necessary to protect a legitimate interest of the data subject.

The Company does not knowingly process special personal information save where permitted by section 26 to 33 of POPIA, and does not process such information for any purpose other than that for which it was lawfully collected.

8.4 Recipients of Personal Information

Personal information may be disclosed to the following categories of recipients, strictly for the purposes described in this section:

- Employees and officers of the Company who require the information to perform their duties;
- Operators engaged by the Company, including payroll administrators, IT service providers, and managing agents, under written agreements which impose confidentiality and security obligations consistent with POPIA;
- Professional advisers, including attorneys, auditors and insurers, where necessary for the provision of professional services;
- Regulatory authorities and organs of state, where disclosure is required or permitted by law; and
- Prospective purchasers or financiers of the Company's business or assets, subject to appropriate confidentiality undertakings.

8.5 Cross-Border Transfers

Where the Company transfers personal information to a recipient located outside the Republic of South Africa — for example, where a service provider's servers or support functions are located abroad — such transfer is only effected in accordance with section 72 of POPIA. This requires either the data subject's consent, the existence of an adequate level of protection in the recipient jurisdiction substantially similar to POPIA, a contractual arrangement between the Company and the recipient which upholds the conditions for lawful processing, or another applicable ground recognised under section 72.

8.6 Information Security

The Company has implemented appropriate, reasonable technical and organisational measures to secure the integrity and confidentiality of personal information in its possession or under its control, in accordance with section 19 of POPIA. These measures are described in greater detail in section 9 of this Manual.

8.7 Retention Periods

The Company retains personal information only for as long as necessary to fulfil the purpose for which it was collected, or as required by applicable law, whichever is longer. Indicative retention periods applied by the Company include:

- Lease and tenancy records: the duration of the tenancy plus a period thereafter consistent with prescription periods under the Prescription Act, 1969;
- Employee records: the duration of employment plus the period prescribed by employment-related legislation, including the Basic Conditions of Employment Act and the Employment Equity Act;
- Financial and tax records: a minimum of five years, in accordance with the Tax Administration Act, 2011, and the Companies Act, 2008;
- CCTV footage: a limited period appropriate to security requirements, ordinarily not exceeding 30 to 90 days unless required for an investigation or legal proceedings; and
- Marketing and prospect records: until the data subject withdraws consent or objects, or until the information is no longer required for the purpose collected.

On expiry of the applicable retention period, personal information is deleted, destroyed or de-identified in a manner that prevents its reconstruction in an intelligible form.

8.8 Children's Information

The Company does not knowingly collect or process the personal information of a child, as defined in POPIA, save where processing is carried out with the consent of a competent person, such as a parent or legal guardian, or where another ground recognised under section 35 of POPIA applies — for example, in relation to the accommodation of students who are minors, where such processing occurs under the consent or involvement of a parent, guardian or the relevant educational institution.

8.9 Direct Marketing

Where the Company conducts direct marketing by means of electronic communication, it does so in accordance with section 69 of POPIA, which ordinarily requires the data subject's consent, save where the Company has obtained the data subject's contact details in the context of a sale of a product or service, and markets similar products or services to that data subject, subject to the data subject being given a reasonable opportunity to object, free of charge, to such use of their details, both at the time the information was collected and on the occasion of each communication.

A data subject may object to the processing of their personal information for direct marketing purposes at any time by contacting the Information Officer using the details in section 4 of this Manual, or by using the unsubscribe mechanism provided in any electronic marketing communication.

8.10 Cookies and Website Usage

The Company's website, www.maldev.co.za, may make use of cookies and similar tracking technologies to enhance user experience, analyse website traffic and support the Company's marketing activities. Where the use of such technologies involves the processing of personal information, this is done in accordance with POPIA and, where applicable, with the visitor's consent. Visitors may manage or disable cookies through their browser settings, noting that certain website functionality may be affected as a result.

9. SECURITY MEASURES

In compliance with section 19 of POPIA, the Company has implemented appropriate technical and organisational measures to safeguard the confidentiality, integrity and availability of records and personal information under its control. These measures are reviewed periodically and updated to address emerging risks.

9.1 Administrative Controls

- A designated Information Officer with responsibility for PAIA and POPIA compliance;
- Internal policies governing the handling, storage and disposal of records and personal information;
- Confidentiality undertakings and data protection clauses in employment contracts and third-party agreements;
- Periodic staff training and awareness on information security and data protection obligations;
- A documented process for identifying, reporting and responding to security compromises.

9.2 Physical Controls

- Restricted access to premises where records are stored, through access control systems and, where appropriate, security personnel;
- Secure storage of physical records in locked cabinets or restricted-access archive facilities;
- Controlled disposal of physical records containing personal information, by shredding or other secure destruction method.

9.3 Electronic Controls

- Firewalls, anti-malware software and network monitoring appropriate to the Company's systems;
- Encryption of personal information in transit and, where appropriate, at rest;
- Regular back-up of electronic records and tested disaster recovery procedures;
- Secure disposal or wiping of electronic media prior to disposal or re-use.

9.4 Access Controls

- Role-based access to systems and records, limited to personnel who require access to perform their duties;
- Unique user credentials and, where appropriate, multi-factor authentication for access to systems containing personal information;
- Periodic review and revocation of access rights, including on termination of employment or a contractual relationship.

9.5 Cybersecurity

The Company maintains cybersecurity measures proportionate to the nature and volume of the personal information it processes, and engages reputable service providers for the hosting, maintenance and security of its electronic systems. Any operator engaged by the Company to process personal information on its behalf is required to implement security measures no less stringent than those required of the Company itself, pursuant to a written agreement as contemplated in section 21 of POPIA.

9.6 Data Protection and Breach Response

Where the Company has reasonable grounds to believe that the personal information of a data subject has been accessed or acquired by an unauthorised person, it will, in accordance with section 22 of POPIA, notify the Information Regulator and the affected data subject(s) as soon as reasonably possible after the discovery of the compromise, providing sufficient information to allow the data subject to take protective measures, unless the identity of the data subject cannot be established, in which case notification will be published in a manner reasonably likely to come to the attention of affected data subjects.

10. REQUEST PROCEDURE

10.1 How to Submit a Request

A requester who wishes to obtain access to a record of the Company must complete the prescribed form, being Form 2 (Request for access to record of private body) contained in Annexure B to the PAIA Regulations, and submit it to the Information Officer at the contact details set out in section 4 of this Manual.

The request must provide sufficient particularity to enable the Information Officer to identify the record and the requester, and must specify the form of access required, an address or manner in which the requester wishes to be informed of the outcome, and, if the request is made on behalf of another person, proof of the authority to act on that person's behalf.

10.2 Processing of a Request

1. The Information Officer will notify the requester, within the prescribed period, of the outcome of the request, including any applicable fees;
2. Where a request affects the rights of a third party, the Information Officer will notify that third party and invite representations before deciding on the request, in accordance with sections 47 to 49 of PAIA;
3. Where access is granted, the Information Officer will provide access in the form requested, where reasonably practicable, or in an alternative form which the requester is capable of accessing;
4. Where access is refused, the Information Officer will provide adequate reasons for the refusal, with reference to the specific grounds set out in PAIA.

10.3 Prescribed Forms

The following forms, prescribed under the PAIA Regulations, are used in connection with a request:

- Form 1: Application to Information Regulator to intervene in relation to a decision of a public body;
- Form 2: Request for access to record of private body;
- Form 3: Internal appeal / application to the Information Regulator to intervene in relation to a decision of a private body;
- Form 4: Request for access to record of public body;
- Form 5: Outcome of request and of fees payable.

Copies of the prescribed forms are available from the Company's Information Officer, from the offices of the Information Regulator, and from the templates contained in the Appendices to this Manual.

11. FEES

In accordance with section 54 of PAIA and the fee structure prescribed under the PAIA Regulations, the following fees may be payable by a requester:

Fee Type	Basis
Request fee	A standard request fee may be payable by a requester seeking access to a record of a private body, prescribed from time to time by the Minister of Justice and Correctional Services.
Access (reproduction) fee	Payable where access is granted, calculated with reference to the actual cost of reproduction, including photocopying, printing, or the cost of an electronic storage medium.
Search and preparation fee	Payable where the search for, and preparation of, a record exceeds the prescribed threshold of hours, calculated at the prescribed hourly tariff.
Deposit	The Information Officer may require a deposit of a portion of the applicable fee prior to processing a request that requires extensive search and preparation.

No fee is payable by a requester seeking access to their own personal information, save for a reasonable reproduction fee where applicable. The current prescribed tariffs are available from the Information Officer on request and are applied in accordance with the applicable Regulations in force at the time of the request.

12. GROUNDS FOR REFUSAL

The Company may refuse a request for access to a record only on the grounds set out in Chapter 4 of Part 3 of PAIA. These grounds include, but are not limited to, the following:

- Mandatory protection of the privacy of a third party who is a natural person, including a deceased individual, in terms of section 63 of PAIA;
- Mandatory protection of commercial information of a third party, in terms of section 64 of PAIA;
- Mandatory protection of certain confidential information of a third party, in terms of section 65 of PAIA;
- Protection of records privileged from production in legal proceedings, in terms of section 67 of PAIA;
- Commercial information of the Company itself, the disclosure of which would be likely to cause harm to its commercial or financial interests, in terms of section 68 of PAIA;
- Protection of the safety of individuals and protection of property, in terms of section 69 of PAIA;
- Records the disclosure of which would frustrate a computer program's or system's security, in terms of section 70 of PAIA; and
- Frivolous or vexatious requests, or requests which would involve an unreasonable diversion of the Company's resources, in terms of section 45 of PAIA.

Where a request is refused in whole or in part, the requester will be furnished with adequate reasons for the refusal, including the provisions of PAIA relied upon, in accordance with section 56 of PAIA.

13. APPEALS AND REMEDIES

PAIA does not provide for an internal appeal against a decision of a private body. A requester who is aggrieved by a decision of the Company, including a refusal of a request, a decision on fees, or the form of access granted, may apply to the Information Regulator or to a court, as contemplated in Part 4 of PAIA, for appropriate relief.

13.1 Application to the Information Regulator

A requester may lodge a complaint with, or apply to, the Information Regulator to intervene in relation to a decision of the Company, using the contact details set out in section 5 of this Manual. The Information Regulator may investigate the complaint and may make such order as it considers appropriate, including an order that the Company take specified steps within a specified period, or that access be granted.

13.2 Application to Court

A requester, third party or the Information Regulator may, in accordance with section 78 of PAIA, apply to a court for appropriate relief in relation to a decision of the Company, including an order compelling the Company to grant access to a record, or reviewing a decision of the Information Regulator.

13.3 POPIA Complaints

A data subject who believes that their personal information has been processed unlawfully may lodge a complaint with the Information Regulator in terms of section 74 of POPIA, using the complaint form and process described in Annexure F to this Manual, or may institute civil proceedings for damages in terms of section 99 of POPIA.

14. AVAILABILITY OF THIS MANUAL

This Manual is made available to the public through the following channels:

- On the Company's website at www.maldev.co.za;
- At the Company's registered office, during ordinary business hours, on request to the Information Officer;
- By electronic copy, on request by email to info@maldev.co.za; and
- At the offices of the Information Regulator, in accordance with section 51(4) of PAIA.

15. REVISION HISTORY

Version	Issue Date	Review Date	Description
1.0	31 July 2026	31 July 2027	Initial issue of the combined PAIA & POPIA Manual.

This Manual will be reviewed at least annually, or sooner if required by a material change in legislation, regulatory guidance, or the Company's operations, structure or processing activities.

16. APPROVAL

This Manual has been considered and approved for publication by the Managing Director of MALDEV PROPERTIES, in the exercise of the Company's obligations under PAIA and POPIA.

Approved By	Managing Director, MALDEV PROPERTIES
Signature	
Date	31 July 2026

APPENDICES

The following templates are provided for the convenience of requesters and data subjects. Where a prescribed statutory form exists (such as Form 2 under the PAIA Regulations), that form takes precedence and is available on request from the Information Officer.

Appendix A: PAIA Request Form (Form 2 : Summary Template)

Request for Access to Record of a Private Body in terms of section 53(1) of the Promotion of Access to Information Act, 2000.

Full name of requester: _____

Identity / registration number: _____

Postal address: _____

Telephone / email: _____

Capacity in which request is made: _____

Particulars of record required: _____

Reference number (if known): _____

Form of access required: _____

Manner in which information is to be conveyed: _____

Signature of requester: _____

Date: _____

Appendix B: POPIA Consent Form

I, the undersigned data subject, having been informed of the purpose and manner of processing described in this Manual, hereby give my voluntary, specific and informed consent to MALDEV PROPERTIES processing my personal information for the purpose stated below.

Full name of data subject: _____

Identity number: _____

Purpose of processing consented to: _____

Signature: _____

Date: _____

I understand that I may withdraw this consent at any time by giving notice to the Information Officer, and that such withdrawal shall not affect the lawfulness of processing carried out prior to withdrawal.

Appendix C: Correction Request Form

Request for correction or updating of personal information in terms of section 24 of POPIA.

Full name of data subject: _____

Identity number: _____

Personal information to be corrected: _____

Correct information / details of correction requested:

Reason for correction: _____

Signature: _____

Date: _____

Appendix D: Deletion / Destruction Request Form

Request for deletion or destruction of personal information in terms of section 24 of POPIA.

Full name of data subject: _____

Identity number: _____

Personal information to be deleted or destroyed:

Reason for request: _____

Signature: _____

Date: _____

The Company will consider each request on its merits and will notify the data subject where a legal obligation requires it to retain the information notwithstanding the request.

Appendix E: Internal Complaint Process

A data subject or requester who wishes to raise a complaint with the Company prior to approaching the Information Regulator may follow the process below:

- Submit a written complaint to the Information Officer, using the contact details in section 4 of this Manual, describing the nature of the complaint and the outcome sought;
- The Information Officer will acknowledge receipt of the complaint within a reasonable period and will investigate the matter;
- The Information Officer will provide the complainant with a written response, including the Company's findings and any remedial steps to be taken;
- Where the complainant is not satisfied with the outcome, they retain the right to lodge a complaint with the Information Regulator or to pursue any other remedy available in law.

Appendix F: POPIA Objection Form

Objection to processing of personal information in terms of section 11(3) of POPIA, including objection to processing for purposes of direct marketing in terms of section 69 of POPIA.

Full name of data subject: _____

Identity number: _____

Personal information / processing objected to: _____

Grounds for objection: _____

Signature: _____

Date: _____

On receipt of a valid objection, the Company will, as soon as reasonably practicable, cease processing the personal information concerned, save where the Company is legally entitled or obliged to continue such processing.