

ACCESS TO INFORMATION MANUAL OF REDEFINE PROPERTIES LIMITED

Registration number: 1999/018591/06

Prepared in accordance with Section 51 of the Promotion of Access to Information Act,
No 2 of 2000 and the Protection of Personal Information Act, No 4 of 2013.

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1. Introduction to Redefine and scope

Redefine is a Real Estate Investment Trust whose shares are listed on the JSE. It derives rental income from investments in:

- office, retail and industrial properties;
- distributions from listed security investments; and
- income from properties developed for trading.

Redefine was listed on the 'Financial – Real Estate' sector of the JSE on 23 February 2000.

The scope of this manual includes Redefine and the following related entities in which Redefine has a direct interest:

Registered company name	Company registration number	Incorporation
Holding company		
Redefine Properties Limited	1999/018591/06	South Africa
Wholly-owned subsidiaries		
Redefine Retail (Proprietary) Limited	2012/079189/07	South Africa
Annuity Properties (Proprietary) Limited	2011/145994/07	South Africa
Redefine Commercial (Proprietary) Limited	2012/089838/07	South Africa
The Pivotal Fund (Proprietary) Limited	2005/030215/07	South Africa
Redefine Global (Proprietary) Limited	2013/175606/07	South Africa
Madison Property Fund Managers Holdings (Proprietary) Limited	2003/021772/07	South Africa
Madison Property Fund Managers (Proprietary) Limited	2005/021874/07	South Africa
Fountainhead Properties (Proprietary) Limited	1983/003324/07	South Africa
Micawber 185 (Proprietary) Limited	2001/000483/07	South Africa
Cape Gannet (Proprietary) Limited	2007/020290/07	South Africa
Erf 2/49 Bryanston (Proprietary) Limited	1993/005155/07	South Africa
Any Name 621 (Proprietary) Limited	2010/017182/07	South Africa
Observatory Business Park (Proprietary) Limited	2001/020483/07	South Africa
Black River Park Investments (Proprietary) Limited	1999/016947/07	South Africa
Pivotman (Proprietary) Limited	2000/015687/07	South Africa
Pivotal CCF (Proprietary) Limited	2007/011140/07	South Africa
Ptn 113 Weltevreden (Proprietary) Limited	1997/012636/07	South Africa
Pivotal Global (Proprietary) Limited	2015/291941/07	South Africa
Greenstone Motor City Trust	IT2532/07	South Africa
Sunninghill Retail Trust	IT645/06	South Africa
Valley View Office Trust	IT3571/06	South Africa

Gateway Retail Trust	IT8646/06	South Africa
Avanti Trust	IT12118/07	South Africa
Farramere Retail Trust	IT642/06	South Africa
Hillcrest Precinct Trust	IT8295/07	South Africa
Riverside Office Park Trust	IT3670/07	South Africa
Wonderboom Junction Retail Trust	IT1732/07	South Africa
Ballywood Trust	IT7790/06	South Africa
Centurion Lifestyle Trust	IT597/06	South Africa
Hazeldean Retail Trust	IT4262/06	South Africa
Alice Lane Trust	IT2560/2011	South Africa
Redefine Europe BV	71844732	Netherlands
Partly-owned subsidiaries		
Republica Student Living (Proprietary) Limited (53.4%)	2014/260294/07	South Africa
Journal Student Accommodation Fund	28124854873	Australia
Journal Student Living (Proprietary) Limited (91%)	615183474	Australia
Associated within the group		
EPP N.V (45.4%)	64965945	Netherlands
European Logistics Investment BV	71509437	Netherlands
Logistics Platform BV	71655395	Netherlands

2. Contact details

Chief executive officer	A König
Directors	M Barkhuysen, A Dambuza, L Kok, A König, N Langa-Royds, B Mathews, L Sennelo, D Naidoo, D Radley, SM Pityana
Appointed information officer	P Moodley
Internet address	www.redefine.co.za
Postal address	PO Box 1731, Parklands 2121
Physical address	5th Floor, 19 Biermann Avenue, Rosebank 2196
Email address	investorenquiries@redefine.co.za

3. Purpose of the manual

The purpose of this manual is to: -

1. Detail the procedure to be followed by a requestor and the manner in which a request for access shall be facilitated, for purposes of PAIA; and
2. For the purposes of POPI, detail the purpose for which personal information may be processed; a description of the categories of data subjects for whom Redefine processes personal information, as well as the categories of personal information relating to such data subjects; and the recipients to whom personal information may be supplied.

4. Definitions and interpretation

The following words will bear the following meanings in this manual: -

"Act"	shall mean the Promotion of Access to Information Act, No 2 of 2000, together with all relevant regulations published;
"Data Subject"	Shall mean the person to whom personal information relates;
"JSE"	JSE Limited, a company duly registered and incorporated with limited liability under the company laws of the Republic of South Africa under registration number 2005/022939/06, licensed as an exchange under the Financial Markets Act (Act No 19 of 2012), as amended;
"Manual"	shall mean this manual, together with all annexures thereto as available at the offices of Redefine from time to time;
"PAIA"	Shall mean Promotion of Access to Information Act, No 2 of 2000;
"POPI"	Shall mean Protection of Personal Information Act, No 4 of 2013;
"POPI Regulations"	Shall mean regulations promulgated in terms of section 112(2) of POPI;
"Private Body"	Shall ascribe to the meaning as promulgated in section 1 of both PAIA and POPI;
"Processing"	Shall ascribe to the meaning as promulgated in section 1 of POPI;
"Record"	Shall ascribe to the meaning as promulgated in section 1 of POPI;
"Responsible Party"	Shall mean 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;
"Requestor"	Shall ascribe to the meaning as promulgated in section 1 of PAIA;
"Request for Access"	Shall ascribe to the meaning as promulgated in section 1 of PAIA;
"Redefine"	shall mean Redefine Properties Limited (registration number 1999/01859/06), a company incorporated in South Africa, and various of its subsidiaries as set out on page 2-3 and further of this manual; and
"SAHRC"	shall mean the South African Human Rights Commission.

5. Guide of the South African Human Rights Commission

1. A guide to the PAIA Act (as contemplated under section 10) is available from the South African Human Rights Commission. The guide contains such information as may reasonably be required by a requester for purposes of exercising any constitutional right contemplated in the Act.
2. The guide is available from the SAHRC. The contact details are as follows:

The South African Human Rights Commission: PAIA Unit

Website: www.sahrc.org.za

Postal address: Private Bag X 2700
Houghton
2041

Physical address: Forum 3 Braampark Offices
33 Hoofd Street
Braamfontein
2017

Telephone number: + 27 11 877 3600

Fax number: + 27 11 403 0625

Email address: PAIA@sahrc.org.za

6. Records automatically available to the public (Section 51(1))

Annual reports	Available on website www.redefine.co.za
Interim reports	Available on website www.redefine.co.za
Investment analyst presentations	Available on website www.redefine.co.za

7. Records held that may be requested (Section 51(1)(e))

The Redefine webpage (www.redefine.co.za) is accessible to anyone with access to the internet.

Administration	Policies and procedures
	Internal correspondence (including minutes of meetings) not marked confidential
	Risk, security and insurance records, operational records
Statutory records	Incorporation documents
	Memorandum of Incorporation
	Minutes of shareholder meetings
	Records relating to the appointment of directors, auditors
	Secretary, public officer and any other officer
	Share register and other statutory registers
Statutory returns to relevant authorities	

Financial records	Accounting records
	Banking records
	Invoices and statements
	Management reports
	Tax records and returns
	Rental agreements
	SARB returns
	Statistics SA returns
	VAT returns
Human resources	BEE statistics
	Career development
	Disciplinary code
	Employment contracts
	Employment equity reports and plans
	Recruitment policies
	Remuneration records and policies
	Retirement benefits and medical aid records
	SETA records
	Training records and skills development
	PAYE, UIF and WCA returns
Information management and technology	Contract agreements with service providers
	Information policies, procedures and guidelines
	Client relationship programmes
	Security and CCTV footage
	Marketing brochures

8. Access request procedure

- It is important to note that the successful completion and submission of an access request form does not automatically allow the Requester access to the requested record.
- An application for access to a record is subject to certain limitations if the requested record falls within a certain category as specified within Part 3, Chapter 4 of the PAIA Act.
- If it is reasonably suspected that the Requester has obtained access to records through the submission of materially false or misleading information, legal proceedings may be instituted against such a Requester.

Completion and submission of access request form (Form C)	Use the prescribed form, available on the SAHRC website at www.sahrc.org.za
	The prescribed form must be completed in full and contain sufficient particularity in order to enable the appointed information officer to identify: <ul style="list-style-type: none"> • The records requested; • The identity of the Requester (and if an agent is lodging the request, proof of capacity); • Which form of access is required; and • The postal address or fax number of the Requester in the Republic of South Africa. The Requester must identify the right which the Requester is seeking to exercise or protect.
	The Requester must provide an explanation of the reason the record is required for the exercise or protection of any right.
	If, in addition to a written reply, the Requester wished to be informed of the decision in respect of the request in any other manner, the Requester is making the request to the reasonable satisfaction of the appointed information officer.
Notification	Redefine will, within 30 days of receipt of the request, decide whether to grant or decline the request and give notice with reasons (if required) to that effect.
	The 30-day period within which Redefine must decide whether to grant or refuse the request may be extended for a further period of not more than 30 days if the request is for a large volume of information or requires Redefine to search through a large volume of records, or the records are not kept at the offices of Redefine.
	Redefine will notify the Requester in writing should an extension be sought.
	If a record requested cannot be found, or does not exist, Redefine shall by means of an affidavit notify the Requester. In the affidavit, a full account is required of all steps taken to find that record in question.

9. Fees in respect to private bodies

1. The PAIA Act provides for two types of fees:
 - a) A request fee, payable by a Requestor other than a personal Requestor; and
 - b) An access fee, which must be calculated by considering reproduction costs, search and preparation time and cost, as well as postage costs.
2. When a request is received by the information officer of the company, the information officer shall by notice require the Requester, other than a personal Requester, to pay the prescribed request fee (if any) before further processing of the request.
3. If a search for the record is necessary and the preparation of the record for disclosure, including arrangement to make it available in the requested form, requires more than the hours prescribed in the regulations for this purpose, the information officer shall notify the Requester to pay as a deposit the prescribed portion of the access fee which would be payable if the request is granted.
4. The information officer shall withhold a record until the Requester has paid the fee or fees as indicated.
5. A Requester whose Request for Access to a record has been granted, must pay an access fee for reproduction and for search and preparation, and for any time reasonably required in excess of the prescribed hours to search for and prepare the record for disclosure, including making arrangements to make it available in the request form.
6. If a deposit has been paid in respect of a Request for Access, which is refused, then the information officer shall repay the deposit to the Requester.
7. The fee that the Requester must pay to a Private Body is R50. The Requester may lodge an application to the court against the tender or payment of the requested fee [s 54(3)(b)].

10. Grounds for refusal of access to records (Chapter 4)

Redefine may refuse a request for information on the following basis:

- 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;
- 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 Redefine, if the disclosure could put that third party at a disadvantage in negotiations or commercial competition;
- Mandatory protection of confidential information of third parties if it is protected in terms of any agreement or legislation;
- Mandatory protection of confidential information if the disclosure would constitute a breach of a duty or confidence to a third party in terms of any agreement;
- Mandatory protection of the safety of individuals and the protection of safety of property;
- Mandatory protection of records which would be regarded as privileged in legal proceedings;
- The commercial activities of Redefine, which may include:
 - Trade secrets of Redefine;
 - Financial, commercial, scientific or technical information which disclosure could likely cause harm to the financial or commercial interests of Redefine; and
 - Information which, if disclosed, could put Redefine at a disadvantage in negotiations or commercial competition;
 - A computer programme which is owned by Redefine, and which is protected by copyright; and

- The research information of Redefine or a third party on behalf of Redefine if the disclosure would expose the third party, Redefine or the researcher of the subject matter of the research to a serious disadvantage.
- Requests for information that are clearly frivolous or vexatious, or which involve an unreasonable diversion of resources, shall be refused.

11. Remedies available upon refusal of a Request to Access

1. Internal remedies

Redefine does not have internal appeal procedures. As such, the decision made by the information officer is final, and Requesters will have to exercise such external remedies at their disposal if the Request for Access is refused.

2. External remedies

In accordance with sections 56(3) (c) and 78 of PAIA, a Requestor may apply to a court for relief within 180 days of notification of the decision for appropriate relief.

12. Processing of personal information

1. Purpose of processing

Redefine uses the personal information under its care in the following ways:

- Administration of invoice payments and issuing of invoices
- Rendering services according to instructions given by clients
- Staff administration which will include existing and potential new employees
- Keeping of accounts and records
- Complying with tax laws
- To provide accounts and services to the customer, in accordance with terms agreed to by the customer
- To undertake activities related to the provision of accounts, services and trade transactions
- The purposes related to any authorised disclosure made in terms of collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction, agreement, law or regulation
- Any additional purposes expressly authorised by the customer
- Any additional purposes as may be notified to the customer or Data Subjects in any notice provided by Redefine
- To comply with any regulation passed under the relevant legislation, or any legal process put forward by any regulatory authority
- To protect Redefine's rights and property, including intellectual property

2. Categories of Data Subjects

Entity type	Personal information
Clients: Natural persons	Names; contact details; physical and postal addresses; date of birth; ID number; tax-related information; nationality; gender; confidential correspondence
Clients: Juristic persons/entities	Names of contact persons; name of legal entity; physical and postal address and contact details; financial information; registration number; founding documents; tax-related information; authorised signatories, beneficiaries, ultimate beneficial owners
Clients: Foreign persons/entities	Names; contact details; physical and postal addresses; date of birth; passport number; tax-related information; nationality; gender; confidential correspondence
Intermediary/Advisor	Names of contact persons; name of legal entity; physical and postal address and contact details; financial information; registration number; founding documents; tax-related information; behaviour signatories, beneficiaries, ultimate beneficial owners
Contracted service providers	Names of contact persons; name of legal entity; physical and postal address and contact details; financial information; registration number; founding documents; tax-related information; behaviour signatories, beneficiaries, ultimate beneficial owners; BEE certificates
Employees/directors	Gender; pregnancy; marital status; race; age; disability information; language; education information; financial information as required for statutory reporting; employment history; education history; CVs; banking details; income tax reference numbers; remuneration and benefit information; ID number; physical and postal address; contact details; opinions; criminal behaviour; wellbeing; details related to employee performance and disciplinary procedures

3. General description of information security measures to be implemented by Redefine

The company employs reasonable up-to-date technology to ensure the confidentiality, integrity and availability of the personal information under its care.

Measures include:

- Firewalls;
- Virus protection software and updated protocols;
- Logical and physical access control;
- Secure setup of hardware and software making up the IT infrastructure; and
- Outsourced service providers who process personal information on behalf of the Company are contracted to implement security controls.

13. List of applicable legislation

Redefine holds/processes records in accordance with the following legislation (Please note that this is not an exhaustive list):

Basic Conditions of Employment Act, No 75 of 1997	Occupational Health and Safety Act, No 85 of 1993
Broad-Based Black Economic Empowerment Act, No 53 of 2003	Consumer Protection Act, No 68 of 2008
Companies Act, No 71 of 2008	Pension Funds Act, No 24 of 1956
Compensation for Occupational Injuries and Health Diseases Act, No 130 of 1993	Skills Development Levies Act, No 9 of 1999
Consumer Affairs (Unfair Business Practices) Act, No 71 of 1988	Skills Development Act, No 97 of 1998
Copyright Act, No 98 of 1978	Trade Marks Act, No 194 of 1993
Employment Equity Act, No 55 of 1998	Unemployment Contributions Act, No 4 of 2002
Harmful Business Practices Act, No 23 of 1999	Unemployment Insurance Act, No 63 of 2001
Income Tax Act, No 95 of 1967	Value Added Tax Act, No 89 of 1991
Intellectual Property Laws Amendments Act, No 38 of 1997	Electronic Communications and Transactions Act, No 37 of 2007
Labour Relations Act, No 66 of 1995	Promotion of Access of Information Act, No 37 of 2007
National Credit Act, No 34 of 2005	Tax Administration Act, No 28 of 2011
Financial Markets Act, No 19 of 2012	Securities Transfer Act, No 25 of 2007

14. Availability of the manual (Section 52(3) of PAIA)

- This manual is available for inspection at the head offices of Redefine, free of charge.
- The manual can also be accessed on the websites of the SAHRC (www.sahrc.org.za) and Redefine (www.redefine.co.za) and may be published in the *Government Gazette*.
- However, it should be noted that the manual accessible on the website of Redefine and the *Government Gazette* does not include the request forms or fee structure. The request forms and fee structure can be obtained on the SAHRC website (www.sahrc.org.za).