

VAL DE VIE GROUP

MANUAL PREPARED IN ACCORDANCE WITH SECTION 51 OF THE PROMOTION OF ACCESS TO INFORMATION ACT NO 2 OF 2000 (“ACT”)

1 VAL DE VIE GROUP COMPANIES

- 1.1 Cape Winelands Properties (Pty) Ltd

- 1.2 Elements Employer Trust

- 1.3 Golden Ribbon Trading 416 (Pty) Ltd

- 1.4 Keysha Investments 213 (Pty) Ltd

- 1.5 Levendal Developments (Pty) Ltd

- 1.6 Pearl Valley Investments (Pty) Ltd

- 1.7 Pearl Valley Golf and Country Estate Homeowners’ Association

- 1.8 Val de Vie II Homeowners’ Association

- 1.9 Val de Vie Developments (Pty) Ltd

- 1.10 Val de Vie Events (Pty) Ltd

- 1.11 Val de Vie Investments (Pty) Ltd

- 1.12 Val de Vie Management (Pty) Ltd

- 1.13 Val de Vie Master HOA NPC

- 1.14 Val de Vie Stables Body Corporate

- 1.15 Val de Vie Winelands and Lifestyle Estate Homeowners’ Association

- 2 **PRIMARY BUSINESS** Luxury lifestyle estates, property development, and management

3 GUIDE IN TERMS OF SECTION 10 OF THE ACT

- 3.1 The section 10 Guide on how to use the Promotion of Access to Information Act No 2 of 2000 (“**the Act**”) is available from the South African Human Rights Commission and is available on their website at <https://www.sahrc.org.za/home/21/files/Section%2010%20guide%202014.pdf>

3.2 Enquiries can be directed to:

The South African Human Rights Commission: PAIA Unit, Private Bag 2700, Houghton, 2041

Tel: +27-11-877-3600 Website: <https://www.sahrc.org.za/>

Fax: +27-11-403-0668 Email: PAIA@sahrc.org.za

4 RECORDS AVAILABLE IN TERMS OF LEGISLATION OTHER THAN THE ACT.

Documents are held in accordance with statutory provisions that include those in the following Acts. This list is not exhaustive.

- 4.1 Basic Conditions of Employment Act 75 of 1997;
- 4.2 Companies Act 71 of 2008;
- 4.3 Compensation for Occupational Injuries and Diseases Act 130 of 1993;
- 4.4 Employment Equity Act 55 of 1998;
- 4.5 Income Tax Act 58 of 1962;
- 4.6 Insolvency Act 24 of 1936;
- 4.7 Occupational Health and Safety Act 85 of 1993;
- 4.8 Sectional Titles Act 95 of 1986;
- 4.9 Sectional Titles Schemes Management Act 8 of 2011;
- 4.10 Skills Development Act 97 of 1998;
- 4.11 Unemployment Insurance Act 30 of 1966; and
- 4.12 Value-Added Tax Act 89 of 1991.

5 CATEGORIES OF RECORDS HELD BY THE GROUP

The Group's web page which is accessible to anyone who has access to the Internet, contains information relating to the business operations of the Group. The web page can be found at: <https://www.valdevie.co.za/>

- 5.1 Other records held by the Group include -
 - 5.1.1 statutory company information;
 - 5.1.2 financial records;
 - 5.1.3 employee records;
 - 5.1.4 records relating to clients and homeowners;
 - 5.1.5 records relating to fixed and movable property;

- 5.1.6 commercial contracts;
 - 5.1.7 insurance contracts;
 - 5.1.8 debt collection records;
 - 5.1.9 records relating to prospective investments and developments; and
 - 5.1.10 records and information required for the exercise or protection of any rights will be made available subject to the provisions of the Act.
- 5.2 Access to records may be refused on grounds specified in the Act.

6 PROCESSING OF PERSONAL INFORMATION

6.1 The Group is a responsible party in accordance with the Protection of Personal Information Act 4 of 2013 and accordingly processes the following personal information -

Data Subjects	Information Categories	Purpose of processing	Recipients of supply of personal information
Employees	<ul style="list-style-type: none"> • Financial information • Tax information • Identity numbers • Contact information • Human resources information 	Human resources	<ul style="list-style-type: none"> • Accountants/Auditors • Payroll • Recruitment • Attorneys
Clients and Homeowners	<ul style="list-style-type: none"> • Financial information • Tax information • Identity numbers • Contact information • Property details 	Provision of services	<ul style="list-style-type: none"> • Accountants/Auditors • Attorneys • Employees • Directors • Banks • External service providers
Service Providers	<ul style="list-style-type: none"> • Financial information • Tax information • Identity numbers • Contact information 	Provision of services	<ul style="list-style-type: none"> • Accountants/Auditors • Attorneys • Directors • Employees • Banks

Data Subjects	Information Categories	Purpose of processing	Recipients of supply of personal information
			<ul style="list-style-type: none"> • External service providers
Shareholders	<ul style="list-style-type: none"> • Financial information • Tax information • Identity numbers • Contact information • Company structures 	Compliance	<ul style="list-style-type: none"> • Accountants/Auditors • Attorneys • Directors • Employees • Banks
Directors	<ul style="list-style-type: none"> • Financial information • Tax information • Identity numbers • Contact information 	Compliance	<ul style="list-style-type: none"> • Accountants/Auditors • Attorneys • Employees • Banks • CIPC

6.2 There are no planned trans-border flows of information at this stage.

6.3 General information security measures relating to the personal information includes (but is not limited to) -

6.3.1 server is backed-up weekly and backups are kept for 30 days;

6.3.2 are stored in a secure access-controlled data centre;

6.3.3 email access requires 2-factor authentication;

6.3.4 external access to the server is locked down;

6.3.5 business continuity plans and disaster recovery testing plans are in place;

6.3.6 antivirus software is updated regularly;

6.3.7 remote monitoring of access activity; and

6.3.8 employees are under an obligation to keep information confidential.

7 FORM OF REQUEST

7.1 The requester must use the prescribed form to make the request for access to a record. Request forms can be obtained on the South African Human Rights Commission (SAHRC) web site <https://www.sahrc.org.za/>.

7.2 The request must be made to the following person:

Full name:	Morne Bosch
Physical Address:	Yard Management Hub, Val de Vie Estate, Paarl, Western Cape, 7646
Postal Address:	P.O. Box 6223, Paarl, Cape Town, Western Cape, 7620
Telephone:	021 863 6100
Email:	info@valdevie.co.za

8 PRESCRIBED FEES

8.1 A requester who seeks access to a record containing personal information about that requester is not required to pay the request fee.

8.2 Every other requester must pay the required request fee of R50.00. The fee structure can be obtained on the South African Human Rights Commission (SAHRC) web site <https://www.sahrc.org.za/>.

9 AVAILABILITY OF THE MANUAL

9.1 This manual and the manual of each individual entity forming part of the Group (“**Manuals**”) is available for inspection at the address indicated at clause 7.2 above at no cost during normal business hours.

9.2 Copies of the Manuals may be obtained, subject to the prescribed fees, from the offices of the Group.