



BRIEDENHANN
P R O P E R T I E S

PROMOTION OF ACCES TO INFORMATION ACT
PAIA & POPI ACT MANUAL & POLICY

BRIEDENHANN PROPERTIES
PROPRIETARY LIMITED

REGISTRATION NUMBER:

2016/136325/07

PREPARED IN TERMS OF SECTION 51 OF THE PROMOTION TO ACCES TO
INFORMATION ACT, ACT 2 OF 2000.

(Further referred to as "PAIA")



Briedenhann Properties (Pty) Ltd 2016/136325/07 Registered with the PPRA - Ref. No. F142915

P.O. Box 26672 | Langenhovenpark | Bloemfontein | 9330
C: 084 8505 140 | gys@brieprop.co.za | www.brieprop.co.za

Director | JG Briedenhann

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BRIEDENHANN

PROPERTIES

1. INTRODUCTION

Briedenhann Properties Proprietary Limited is an estate agency whose ordinary course of business includes but is not limited to the following services, being:

- 1.1 Facilitation of sale agreements over immovable property.
- 1.2 Facilitation of rental agreements over immovable property.
- 1.3 Facilitation of valuations over immovable property.
- 1.4 Ordinary service normally expected of an estate agency conducted by property practitioners and

2. COMPANY CONTACT DETAILS

In accordance with Section 51(1)(a) of PAIA the company declares the following contact information and details to be the relevant contact information required, being:

DESCRIPTION	INFORMATION / DETAILS
2.1 – Name of Business	Briedenhann Properties Proprietary Limited
2.2 – Registration Number	2016/136325/07
2.3 – Industry	Estate Agency
2.4 – Directorate	Jannie Gysbert Briedenhann (ID – 8505145115085)
2.5 – Contact Person	Jannie Gysbert Briedenhann
2.6 – Physical Address	1 Mikro Street, Langenhovenpark, District Bloemfontein Province Free State.
2.7 – Postal Address	1 Mikro Street, Langenhovenpark, Bloemfontein
2.8 – Telephone Number	084 850 5140
2.9 – Email Address	admin@briepprop.co.za
2.10 – Last Update	23 September 2025

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3. THE ACT – PROMOTION OF ACCESS TO INFORMATION ACT

In accordance with Section 51(1)(b) an explanation is brought i

- 3.1 The Promotion of Access to Information Act 2 of 2000 grants a requester access to records of a private body, if the record is required for the exercise or protection of any rights. If a public body lodges a request, the public body must be acting in the public interest.
- 3.2 Requests in terms of the ACT shall be made in accordance with the prescribed procedures, at the rates provided. The forms and tariff are dealt with in paragraphs 6 and 7 of the Act.
- 3.3 Requesters are referred to the Guide in terms of Section 10 which has been compiled by the South African Human Rights Commission, which will contain information for the purposes of exercising Constitutional Rights. The Guide is available from the South African Human Rights Commission. Please direct queries to **the research and documentation department of the PAIA UNIT of the Human Rights Commission with the following contact details:**

3.3.1 – Postal Address	Private Bag 2700 Houghton 2041
3.3.2 – Telephone	011 477-3600
3.3.3 - FAX	011 403 0625
3.3.4 – Website	www.sahrc.co.za
3.3.5 – Email	PAIA@sahrc.org.za



4. APPLICABLE LEGISLATION

In accordance with Section 51(1)(c) of PAIA, information is available in terms of the following applicable legislation, being:

- 4.1 The Constitution of the Republic of South Africa, 1996.
- 4.2 Property Practitioners Act, Act No. 22 of 2019.
- 4.3 Broad-Based Economic Empowerment Act No. 53 of 2003.
- 4.4 Companies Act, Act No.71 of 2008.
- 4.5 Electronic Communications and Transactions Act No. 25 of 2002.
- 4.6 Protection of Personal Information Act, Act No. 4 of 2013.
- 4.7 Financial Intelligence Centre Act No. 38 of 2000.
- 4.8 Income Tax Act No. 58 of 1962.
- 4.9 Value – Added Tax Act No. 89 of 1991.
- 4.10 South African Revenue Services Act, 34 of 1997.
- 4.11 Labour Relations Act No. 66 of 1995.
- 4.12 Basic Conditions of Employment Act No. 75 of 1997.
- 4.13 Rental Housing Act, Act No. 50 of 1999.
- 4.14 Trust Property Control Act, Act No. 57 of 1998.
- 4.15 Sectional Title Scheme Management Act, Act No. 8 of 2011.
- 4.16 Consumer Protection Act, Act No.68 of 2008.



5. BUSINESS SPECIFIC LEGISLATION

- 5.1 The Constitution of the Republic of South Africa, 1996.
- 5.2 Property Practitioners Act, Act No. 22 of 2019.
- 5.3 Companies Act, Act No. 71 of 2008.
- 5.4 Electronic Communications and Transactions Act No. 25 of 2002.
- 5.5 Protection of Personal Information Act, Act No. 4 of 2013.
- 5.6 Financial Intelligence Centre Act No. 38 of 2000.
- 5.7 Rental Housing Act, Act No. 50 of 1999.
- 5.8 Trust Property Control Act, Act No. 57 of 1998.
- 5.9 Sectional Title Scheme Management Act, Act No. 8 of 2011.

6. SCHEDULE OF RECORDS

In accordance with Section 51(1)(d) of PAIA:

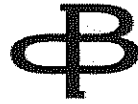
- 6.1 Records which are available without a person having to request access in terms of PAIA in terms of Section 52(2) [Section 51(1)(c)] include details about products, services and acceptable use policy
 - 6.1.1 The information referred to includes but is not limited to the following items, being:
 - Brochures, posters and company newsletters, publications on social media platforms, and various other marketing materials such as boards and our website.



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6.2 Day to Day operations are generally not applicable to persons outside the company for the purpose of protecting their Constitutional rights, examples of such information are:

6.2.1 Private information of clients, contracts, legal documentation and financial information.

6.3 Details of products, services and the acceptable use policy are freely available to the general public for inspection at our office situated at:

6.3.1 1 Mikro Street, Langenhovenpark, District Bloemfontein, Province Free State.

6.4 All clients will automatically have direct and full access available to them for all information in relation to our services rendered to them.

7. PROTECTION OF PRIVACY

The Protection of Personal Information Act, Act 4 of 2013 governs the protection of personal information as envisaged in Section 1 and utmost protection is given to all persons and therefor it is crucial to take note of the following aspects of the POPI Act, being:

7.1 The purpose of the Protection of Personal Information Act is to protect people from harm by protecting their personal information, in short to protect their privacy which is a fundamental right in terms of the Constitution of the Republic of South Africa.

7.2 To achieve the protection envisaged, the POPI Act sets out certain conditions as to when a person can lawfully acquire personal information of another person.

7.3 In terms of POPI, personal information must be process for a specified purpose. The purpose of which data is processed by the Private Body will depend on the nature of the data and the particular



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data subject requesting and affected. This purpose is ordinarily disclosed, either explicitly or implicitly, at the date and time that the data is collected.

(Kindly refer to the POPI Policy of Briedenhann Properties, inspectable at our office 1 Mikro Street, Langenhovenpark, District Bloemfontein, Province Free State.)

8. BRIEDENHANN PROPERTIES – PROCESSING OF PERSONAL INFORMATION OF DATA SUBJECTS

- 8.1 In accordance and for the purposes of Section 51(1)(c)(i):
- 8.1.1 Fulfilling the statutory obligations in terms of the applicable legislation.
 - 8.1.2 Verifying information provided to Briedenhann Properties Proprietary Limited
 - 8.1.3 Obtaining information necessary to provide contractually agreed service to clients.
 - 8.1.4 Monitoring, maintaining and managing Briedenhann Properties contractual obligations to clients, contractors, service providers, employees, directors and other consenting third parties.
 - 8.1.5 Marketing and advertising.
 - 8.1.6 Resolving and tracking of complaints.
 - 8.1.8 Monitoring and securing the assets of the employees and visitors to the premises of Briedenhann Properties.
 - 8.1.9 Historical record keeping, research and recording necessary statistics necessary to enable Briedenhann Properties to fulfil in its business goals.



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- 8.2 Briedenhann Properties may process the following personal information in accordance with Section 51(1)(c)(ii) the following categories of data subjects, which includes current, past and prospective data subjects, namely:
- 8.2.1 Clients and employees, representatives, agents, contractors and service providers of such clients.
 - 8.2.2 Suppliers, service providers to and vendors of Briedenhann Properties and employees, representatives, agents, contractors and service providers of such suppliers and service providers.
 - 8.2.3 Directors and officers of Briedenhann Properties.
 - 8.2.4 Share holds.
 - 8.2.5 Job applicants.
 - 8.2.6 Existing or former employees (including contractors, agents, whether temporary, casual or permanent
 - 8.2.7 Visitors to the premises of Briedenhann Properties
 - 8.2.8 Complaints, queries and/or correspondence from clients.
- 8.3 The nature of personal information processed of the data subject in accordance with Section 51(1)(c)(ii) includes the following, being:
- 8.3.1 Name, identity number, email address, physical address, telephone number, location information, online identification or other particulars assigned to the data subject.
 - 8.3.2 Biometric information should same be available.
 - 8.3.3 Information relating to the education, medical, financial, criminality and/or employment history of the data subject.
 - 8.3.4 Information relating to the gender, marital status, nationality, origin, age, disability and birth of the data subject.
 - 8.3.5 The opinion, views or preferences of the data subject
 - 8.3.6 Confidential correspondence sent by the data subject.



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- 8.3.7 The views or opinions of another individual about the data subject.
- 8.4 Briedenhann Properties may supply personal information to the following recipients in accordance with Section 51(1)(c)(iii) includes the following entities, being:
- 8.4.1 Regulatory, statutory and governing bodies.
 - 8.4.2 Supplies, service providers, vendors, agents and representatives of Briedenhann Properties
 - 8.4.3 Employees of Briedenhann Properties.
 - 8.4.4 Shareholders and stakeholders in Briedenhann Properties.
 - 8.4.5 Third party verification agencies and credit bureau.
 - 8.4.6 Collection agencies.
 - 8.4.7 Banks, bond originators and other financial institutions.
- 8.5 Briedenhann Properties accounts for the possible transborder flow of personal information in accordance with Section 51(c)(iv) on the following basis, being:
- 8.5.1 Personal information of data subjects may be transferred across borders and jurisdictions due to the hosting of some of Briedenhann Properties infrastructure in other countries.
 - 8.5.2 Current employees and information of the consultants may also be transferred transborder where Briedenhann Properties may need to fulfil in its mandates and/or contractual obligations.
 - 8.5.3 The normal course of processing of personal information of Briedenhann takes place within the jurisdiction of South Africa and transborder flow of information does not occur during the normal course of business.
- 8.6 Briedenhann Properties has the following security measures which are to be implemented in accordance with Section 51(1)(c)(v), these measures include but are not limited to:
- 8.6.1 Briedenhann Properties continuously establishes and maintains appropriate, reasonable, technical and organisational measures to ensure the integrity of the personal information in its possession or under its control is secure in as far possible and reasonable.
 - 8.6.2 Further ensuring that such information is protected against unauthorized or unlawful processing, accidental loss, destruction or damages, alterations or access to the requirements determined by



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law, industry practices and generally accepted information security practices and procedures will apply to Briedenhann Properties.

8.7 General Data Protection Regulation (GDPR)

8.7.1 GDPR is European based and relates to personal information of individuals and does not provide protection to businesses.

8.7.2 The POPI Act however extends protection to legal entities, which would then mean that Briedenhann Properties is required to protect information collected about companies, closed corporations, trusts as well as the personal information of individuals.

8.8 Requests by Data Subjects

8.1 Data subjects have a right in terms of the Protection of Personal Information Act, Act 4 of 2013 to request details of the personal information stored and processed by Briedenhann Properties.

8.2 Data subjects can also further apply for the removal of personal information by submitting the prescribed form.

8.3 If at any time the data subject feels that the right of privacy has been disturbed, a complaint may be lodged with the Information Regulator, in the prescribed form, providing clear details of the alleged infringement.

9. PROCEDURE - PAIA

In accordance with Section 53(1) of PAIA, the procedure to be followed to make a request in terms of PAIA is:

- 9.1 The requester must use the prescribed form to make the request for access to a record. This must be made to the head of the private body. This request must be made to the address and to the electronic mail address.
- 9.2 The requestor must provide sufficient detail on the request form to enable the head of the private body to identify the requestor and the requester.



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- 9.3 The requestor must identify the right that is sought to be exercised or to be protected and provide an explanation as to why the requested record is required for the exercise or protection of that right.
- 9.4 If the circumstances occur where a request is made on behalf of another person, the requestor must submit proof of the capacity in which the requestor is making the request to the satisfaction of the head of the private body.
- 9.5 A requestor who seeks access to record containing personal information about the requestor is not required to pay the request fee. Every other requestor, who is not a personal requestor must pay the required request fee. (See Annexure below)
- 9.6 The fee the requestor must pay to the private body is R50-00 and the requestor must lodge an application to the court against the tender of payment of such request fee.
- 9.7 If the request is granted then a further access fee must not be paid for the search, reproduction, and preparation and for any time that has exceeded the prescribed hours to search and prepare such records for disclosure.

10. PROCEDURE - POPI

Procedure to be followed when making a request in terms of the Protection of Personal Information Act, Act 4 of 2013:

- 10.1 If an individual request for correction or deletion of personal information or destroying or deletion of record of personal information in terms of Section 24(1) of the POPI Act, it can be done by obtaining the necessary application form from the Information Office.



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11. PRESCRIBED FEES

Requesters are obligated to pay prescribed fees in accordance with Section 51(1)(f) for accessing of public record and private bodies records. This fees covers the cost of searching for the record and copying it.

Please refer to the Annexure for any additional information or fees.

The fees for accessing records of this private body are prescribed fees in the Act:

ACTIVITY	FEE
Copy per A4 page	R1-10
Printing per A4 page	R0-75
Copy on a CD / USB Stick	R70-00
Transcription of visual images per A4 page	R40-00
Copy of visual image	R60-00
Transcription of audio recording per A4 page	R20-00
Copy of an audio recording	R30-00
Search and preparation of the record for disclosure	R30-00 per hour or part thereof (excl first hour) reasonably required for search and preparation
Postage and/or courier fees have to be paid by the requester for the delivery of the records in the case of both public and private bodies.	

Exceptions

- Where information officer/deputy information office or head/deputy of private bodies are of the opinion that delivery of information will take more than 6 hours, then a deposit is payable by the requester and a formal notice must be brought to the requester that one third of the access fee is payable up front as deposit.




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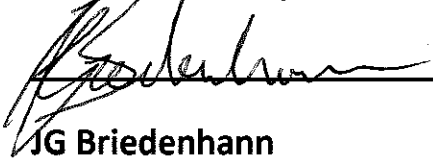
2. If by virtue of a disability the requester is unable to access the record, Briedenhann Properties will provide same in a form that is accessible to the requester.

SIGNING & DECLARATION ON BEHALF OF **BRIEDENHANN PROPERTIES**

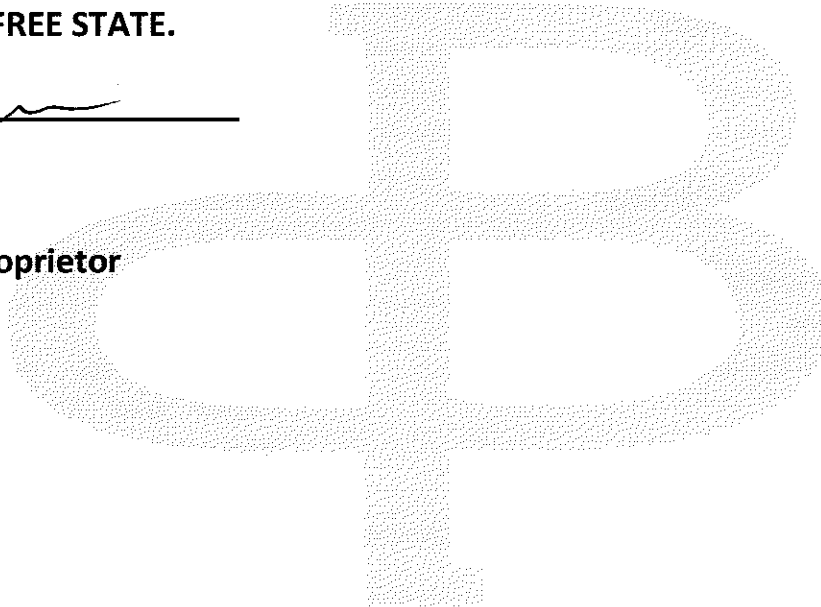
This manual is herewith incorporated and signed by **Jannie Gysbert**

Briedenhann on this 12 day of November 2025 at

BLOEMFONTEIN, FREE STATE.


JG Briedenhann

Sole director & proprietor







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ANNEXURE A – ACCESS TO INFORMATION

FORM C

Request form for access to a record of Entity

In accordance with Section 53(1) of Promotion of Access to Information Act, Act 2 of 2000.

REGULATION 10

A. PARTICULARS OF PRIVATE BODY REQUESTING ACCESS TO THE RECORD

Contact Details	
Chief Executive Officer (Defined in Act)	
Information Officer	
Postal Address	
Physical Address	
Phone Number	
E-mail Address	
Website	



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B. PARTICULARS OF PERSON REQUESTING ACCESS TO THE RECORD

- The particulars of the person who requests access to the record must be recorded below.
- Furnish an address in the Republic of South Africa to which information must be sent.
- Proof of identity is required from both the requester and any person acting on the behalf of a requester.
- The original identity document will need to be presented along with the request to the Chief Executive Officer, as defined by the Act.
- If the request is made on behalf of another person, the proof of capacity in which the request is made needs also be presented.

DETAILS OF REQUESTER

Full names and surname	
Identity Number	
Postal Address	
Telephone Number	
E-mail Address	

C. PARTICULARS OF PERSON ACTING ON BEHALF OF REQUESTER

Full names and Surname	
Identity Number	

D. PARTICULARS OF RECORD

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, continue on a separate folio and attach it to this form. The requester must sign all the additional folios.

The requester's attention is draw to the grounds on which the private body must/may refuse access to a record (certain cases this may be mandatory; in others it may be discretionary).

- Privacy of third party who is a natural person.
- Mandatory protection of certain confidential information of a third party.



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- Mandatory protection of commercial information of third party.
- Mandatory protection of the safety of individuals, and the protection of property.
- Mandatory protection of record privileged from production in legal proceedings.
- Commercial information of a private body.
- Mandatory protection of research information of a third party and a private body.

DESCRIPTION OF RECORD OR RELEVANT PART OF THE RECORD:

Reference Number (If available)	
Description of Record	
Any particulars of Record	

Take note of:

- Your indication as to the required form of access depends on the form in which the record is available.
- Access in the form requested may be refused in certain circumstances. In such a case you will be informed if access will be granted in another form.
- The fee payable for access to the record, if any, will be determined partly by form in which access is requested.

1. If the record is in written or printed form			
Copy of Record		Inspection of Record	
2. If record has visual images, video recordings, etc			
View the images		Copy of Images	
3. If record consists of words/information produced in sound			
Listen to the audio track		Transcribe audio track	



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4. If record is held on a computer or electronic storage device			
Printed copy		Copy in electronic form	
If you request a copy of the transcription of a record, do you wish the copy or the transcription to be posted to you? Postage is payable YES NO			

E. FEES

A request for access to a record, other than a record containing personal information about yourself, will be processed only after a request fee (currently **R50-00**) has been paid.

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.

Should you feel that you qualify for an exemption of fees, state why hereunder:

F. FORM OF ACCESS TO RECORD

If you are prevented by a disability to read, view or listen to the record in the form of access to provide hereunder, state your disability and indicate which form of access required:

Disability	
------------	--



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Form in which record is required

G. PARTICULARS OF RIGHT TO BE EXERCISED OR PROTECTED

If the provided space is inadequate, please continue with the use of a separate folio and attach it to this form. The requester must sign all additional folios to be provided.

Indicate which **RIGHT** is to be exercised or protected

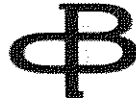
Explain why the record is required for the exercise or protection of the right as set out above



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H. NOTICE OF DECISION REGARDING THE REQUEST FOR ACCESS

You will be notified in writing whether your request has been approved or denied. If you wish to be informed in another manner, specify the manner and provide us with the necessary particulars to enable compliance with your request.

How would you prefer to be informed of the decision regarding your request for access to the record?

Signed at _____ on this _____ day of _____ 2025

(Print Name)

(Signature)

Signature of Requester / Person on whose behalf request is made.



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ANNEXURE B – FEES SCHEDULE

PROMOTION OF ACCESS TO INFORMATION ACT 2000 REGULATIONS RELATING TO THE PROMOTION OF ACCESS TO INFORMATION

The Minister of Justice and Constitutional Development has, under Section 92 of the Promotion of Access to Information Act, Act 2 of 2001 made the regulations to the Schedule.

SCHEDULE

Definition

1. In these Regulations any word or expression to which a meaning has been assigned in the Act shall bear that meaning and, unless the context otherwise indicates -

"the Act" means the Promotion of Access to Information Act, 2000 (Act No. 2 of 2000).

Form of request

2. A request for access to a record, as contemplated in section 18(1) of the Act, must be made in the form of Form A of the Annexure.

Fees for records of public body

3 (1) The fee for reproduction, referred to in section 15(3:1) of the Act, is as follows:

R

(a) For every photocopy of an A4-size page or part thereof	R0.60
(b) For every printed copy of an A4-size page or part thereof held on a computer or in electronic or machine-readable form	R0.40
(c) For a copy in a computer-readable form on -	
(i) stiffy disc	R5.00
(ii) compact disc	R40.00
(d) (i) For a transcription of visual images, for an A4-size page or part thereof	R22.00
(ii) For a copy of visual images	R60.00
(e) (i) For a transcription of an audio record, for an A4-size page or part thereof	R12.00
(ii) For a copy of an audio record	R17.00

(2) The request fee payable by every requester, other than a personal



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requester referred to in section 22(1) of the Act, is	R35.00
(3) The access fees payable by a requester referred to in section 22(7) of the Act, unless exempted under section 22(8) of the Act, are as follows:	
(a) For every photocopy of an A4-size page or part thereof	R6.00
(b) For every printed copy of an A4-size page or part thereof held on a computer or in electronic or machine-readable form	R0.40
(c) For a copy in a computer-readable form on -	
(i) stiffer disc	R5.00
(ii) compact disc	0.00
(d) (i) For a transcription of visual images, for an A4-size page or part thereof	R22.00
(ii) For a copy of visual images	R60.00
(e) (i) For a transcription of an audio record, for an A4-size page or part thereof	R12.00
(ii) For a copy of an audio record	R17.00
(f) To search for the record for disclosure, for each hour or part of an hour excluding the first hour reasonably required for such search.	R15.00
(4) The actual postal fee is payable when a copy of a record must be posted to a requester	
(5) For purposes of section 22(2) of the Act the following applies:	
(a) Six hours as the hours to be exceeded before a deposit is payable; and	
(b) one third of the access fee is payable as-a deposit by the requester.	

Form of request

4. A request for access to a record, as contemplated in section 53(1) of the Act, must be made in the form of Form B of the Annexure.

Fees for records of private body

5 (1) The fee for reproduction referred to in section 52(3) of the Act, is as follows:

R	
(a) For every photocopy of an A4-size page or part thereof	R1.10
(b) For every printed copy of an A4-size page or part thereof held on a computer or in electronic or machine-readable form	R0.75
(c) For a copy in a computer-readable form on. -	
(i) stiffer disc	R7.50
(ii) compact disc	R70.00
(d) (i) For a transcription of visual images, for an A4-size page or part thereof	R40.00
(ii) For a copy of visual images	R60.00



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(e) (i) For a transcription of an audio record, for an A4-size page or part thereof	R20.00
(ii) For a copy of an audio record	R30.00
(2) The request fee payable by a requester, other than a personal requester, referred to in section 54(1) of the Act is	R50.00
(3) The access fees payable by a requester referred to in section 54(7) of the Act, unless exempted under section 54(8) of the Act, are as follows:	
(a) For every photocopy of an A4-size page or part thereof	R1.10
(b) For every printed copy of an A4-size page or part thereof held on a computer or in electronic or machine readable form	R0.75
(c) For a copy in a computer-readable form on -	
(i) stiffy disc	R7.50
(ii) compact disc	R70.00
(d) (i) For a transcription of visual images, for an A4-size page or part thereof	R40.00
(ii) For a copy of visual images	R60.00
(e) (i) For a transcription of an audio record, for an A4-size page or part thereof	R20.00
(ii) For a copy of an audio record	R30.00
(f) To search for the record for disclosure, for each hour or part of an hour reasonably required for such search.	R30.00
(4) The actual postal fee is payable when a copy of a record must be posted to a requester.	
(5) For purposes of section 54(2) of the Act the following applies:	
(a) Six hours as the hours to be exceeded before a deposit is payable; and	
(b) one third of the access fee is payable as a deposit by the requester.	

Notice of internal appeal

6. Notice of an internal appeal, as contemplated in section 75(1) of the Act, must be lodged in the form of Form C of the Annexure.

Appeal fees

7. The appeal fee payable in respect of the lodging of an internal appeal by a requester against the refusal of his or her request for access, as contemplated in section 75(3)(a) of the Act is R50.00

Value-added tax

8. Public and private bodies registered under the Value-Added Tax Act, 1991 (Act No. 89 of 1991), as vendors may add value added tax to all fees prescribed in terms of these regulations.

Commencement

9. These regulations shall come into operation on 9 March 2001.



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ANNEXURE C – POPI

FORM 1

OBJECTION AGAINST PROCESSING OF PERSONAL INFORMATION IN TERMS OF SECTION 11(3) OF THE PROTECTION OF PERSONAL INFORMATION ACT, ACT 4 OF 2013.

REGULATIONS RELATING TO THE POPI ACT

Regulation 2

Note:

1. Affidavits or other documentary proof may be attached.
2. If the space provided is inadequate, a folio as annexure may be attached.
3. Complete only as is applicable:

A.	DETAILS OF DATA SUBJECT
Identity Number	
Residential, business address	
Contact Number	
E-mail Address	
B.	DETAILS OF RESPONSIBLE PARTY
Name & Surname of Data Subject	
Identity Number	
Residential, business address	
Contact Number	



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E-mail Address	
C.	REASONS FOR OBJECTION

Signed at _____ on this ____ day of _____ 2025

(Print Name)

(Signature)

Signature of Person Objecting
In terms of Section 11(3) of
POPI Act.



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FORM 2

REQUEST FOR CORRECTION OR DELETION OF PERSONAL INFORMATION OR DESTROYING OR DELETION OF RECORD OF PERSONAL INFORMATION IN TERMS OF SECTION 24(1) OF THE POPI ACT, ACT 4 OF 2013.

REGULATIONS RELATING TO THE POPI ACT

Regulation 3

Note:

1. Affidavits or other documentary proof may be attached.
2. If the space provided is inadequate, a folio as annexure may be attached.
3. Complete only as is applicable:
4. Submit to the current Information Officer of Briedenhann Properties Pty Ltd at: admin@brieprop.co.za

Request for: (Mark with "X" inside box)

- ☐ Correction or deletion of personal information about the data subject which is in possession or under the control of Briedenhann Properties Pty Ltd.
- ☐ Destroying or deletion of a record of personal information about the data subject which is in possession or under the control of Briedenhann Properties who is no longer authorized thereto to retain such information for the record:

A.	DETAILS OF DATA SUBJECT
Name & Surname of Data Subject	
Identity Number	
Residential, business address	
Contact Number	
E-mail Address	
B.	DETAILS OF RESPONSIBLE PARTY
Full Trading Names	Briedenhann Properties (Pty) Ltd
Registration Number	2016/136325/07



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Business address	1 Mikro Street, Langenhovenpark, Bloemfontein
Contact Number	087 898 0874
E-mail Address	admin@brieprop.co.za
C.	INFORMATION TO BE CORRECTED / DELETED / DESTROYED / DESTRUCTED
D.	REASON FOR CORRECTION OR DELETION in terms of Section 24(1)(a) and/or 24(1)(b)

Signed at _____ on this _____ day of _____ 2025

(Print Name)

Signature of Person Objecting
In terms of Section 24(1)(a) and/or
24(1)(b) of POPI Act.

(Signature)



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FORM 3

INFORMATION OFFICER'S REGISTRATION FORM

IN TERMS OF SECTION 55(2) OF THE POPI ACT, ACT 4 OF 2013.

Note:

1. The personal information herein submitted herein shall be solely for registration with the Information Regulator ("Regulator").
2. All the information submitted herein shall be used for the purpose as stated above, as mandated by law. This information may be disclosed to the public.
3. The Regulator undertakes to ensure that property security control measures are implemented to protect all the information to be submitted in this document.
4. A list of all designated Deputy Information Officers must be attached to this Form including their names, official postal and street addresses, phone number and electronic mail addresses.
5. A body must, if necessary, update the particulars of the Information Officer and Deputy Information Officer at intervals of not more than one year.
6. This form must be sent to: The Information Regulator, registration.IR@justice.gov.za or P.O Box 31533, Braamfontein, Johannesburg 2017.

A.	INFORMATION OFFICER
Full name(s) of Information Officer	Jannie Gysbert Briedenhann (ID – 850814 5115 085)
Designation	Director & Sole Proprietor
Postal Address	1 Mikro Street, Langenhovenpark, Bloemfontein, Province Free State.
Physical Address	1 Mikro Street, Langenhovenpark, Bloemfontein, Province Free State.



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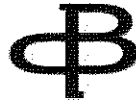
Cell phone Number	084 8505 140
Landline Number	087 898 0874
Direct E-mail Address	gys@brieprop.co.za
General E-mail Address	admin@brieprop.co.za
B.	DEPUTY INFORMATION OFFICER
Full name(s) of Information Officer	N/A
Designation	N/A
Postal Address	N/A
Physical Address	N/A
Cell phone Number	N/A
Direct E-mail Address	N/A
General E-mail Address	N/A
C.	RESPONSIBLE PARTY – BRIEDENHANN PROPERTIES PROPRIETARY LIMITED
Type of Entity	Private Company (PTY) Ltd
Full name of Entity	Briedenhann Properties Pty Ltd
Trading Name of Entity	Briedenhann Properties Pty Ltd
Registration Number	2016/13635/07
Postal Address	1 Mikro Street, Langenhovenpark, District Bloemfontein, Province Free State.
Physical Address	1 Mikro Street, Langenhovenpark, District Bloemfontein, Province Free State.
Landline Number	087 898 0874



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E-mail Address	admin@brieprop.co.za
Website	www.brieprop.co.za

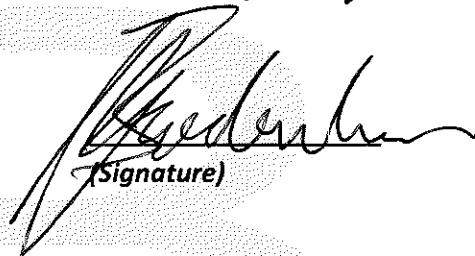
Declaration:

I declare this information contained herein to be true, correct and accurate in as far my knowledge.

Signed at Bloemfontein on this 12 day of November 2025

JG Briedenhann
(Print Name)

INFORMATION OFFICER


(Signature)



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FORM 4

INFORMATION OFFICER'S APPOINTMENT

REGULATIONS RELATING TO THE PROTECTION OF PERSONAL INFORMATION

REGULATION 3 & 4

Note:

1. The personal information herein submitted herein shall be solely for registration with the Information Regulator ("Regulator").
2. All the information submitted herein shall be used for the purpose as stated above, as mandated by law. This information may be disclosed to the public.
3. Information Officers need to be registered with the Information Regulator before taking up such duties.
4. A signed copy of this document can be included as an appendix to the designated Information Officer's current employment contract.

**JANNIE GYSBERT BRIEDENHANN
DIRECTOR & SOLE PROPRIETOR of
BRIEDENHANN PROPERTIES**

is hereby appointed as the Information Officer for Briedenhann Properties Proprietary Limited.

Section 55(1) of POPIA sets out the duties and responsibilities of an Information Officer which include the following:

1. To encourage compliance with POPI.
2. Dealing with requests made to the organisation in relation to POPI (for instance, requests from Data Subjects to update or view their personal information).
3. Working with the Information Regulator in relation to investigations.
4. Otherwise ensuring POPI compliance as may be prescribed by the Regulator's website.

Furthermore, Regulation 4 lists the following prescribed responsibilities in addition to those listed above:

- Compliance Framework
 - o Develop and implement compliance framework.
 - o Ensure it stays monitored and maintained over time.



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Director | JG Briedenhann



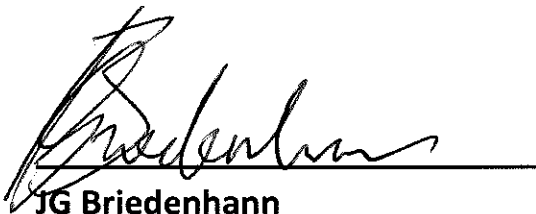
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- Personal Information Impact Assessments ("PIIA")
 - o Conduct PIIA to ensure adequate measures and standards exist in order to comply to the conditions for the lawful processing of personal information.
- POPIA Manual: ensure that your company has one
 - o Ensure that the manual is monitored.
 - o Make sure availability thereto in accordance with PAIA (fees taken into account).
- Enable Data Subject participation
 - o Develop measures and adequate systems to process requests for information or access to information.
 - o Appoint Deputy Information Officer(s).
 - o Provide training in accordance with POPI.
- Awareness Training: Internal training
 - o Explanations of the provisions of POPI.
 - o Regulations made in terms of POPI.
 - o Codes of Conduct explanation.
 - o Information obtained by Regulator explained.
 - o Ongoing training and awareness sessions in accordance with the growth of the applicable Acts and regulations thereto.

This manual is herewith incorporated and signed by **Jannie Gysbert**

Briedenhann on this 12 day of November 2025 at

BLOEMFONTEIN, FREE STATE.



JG Briedenhann

Sole director & proprietor



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FORM 5

APPLICATION FORM FOR PRIOR AUTHORISATION

Guidance Note of the Information Regulator 11 March 2021

In accordance with Section 58(1) of the Protection of Personal Information Act, 2013

Note:

1. The personal information submitted herein shall be solely used for the purposes of prior authorization application submitted to the Information Regulator ("Regulator") in terms of Section 58(1) of the Protection of Personal Information Act, 2013.
2. All the information submitted herein shall be used for the purpose as stated above, as mandated by law. This information may be disclosed to the public. The Regulator undertakes to ensure that appropriate security measures are implemented to protect all the personal information to be submitted in this document.

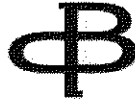
A.	ENTITY / RESPONSIBLE PARTY
Type of Entity	Private Company (PTY) Ltd
Full Name of Entity	Briedenhann Properties Pty Ltd
Trading Name	Briedenhann Properties Pty Ltd
Registration Number	2016/13635/07
Full name of Information Officer	Jannie Gysbert Briedenhann
ID Number of Information Officer	8505145115085
Postal Address	1 Mikro Street, Langenhovenpark, District Bloemfontein, Province Free State
Physical Address	1 Mikro Street, Langenhovenpark, District Bloemfontein, Province Free State
Landline Number	087 898 0874
Website	www.brieprop.co.za



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B.		NOTIFICATION OF PROCESSING	
Please select a category of personal information you intend to process (subject to authorization) (Mark with "X")			
B1 – Unique Identifiers of Personal Information for other purpose	B2 –Credit Reporting	B3 – Criminal Behaviour Bad conduct toward 3rd Parties	
B4 – Any other legitimate interest for processing of personal information (specify):			
B5 – Specify category of Data Subjects whose information to be processed			
B5.1 – Employees / Prospective Employees	B5.2 – Clients / Prospective Clients	B5.3 – Developers	
B5.4 – Valuers	B5.5 – Bond Originators	B5.6 Attorneys / Conveyancers	
B5.7 – Municipality	B5.8 – Banks	B5.9 – Body Corporates	
B5.10 – Other (specify):			
B6 – Security measures to be implemented to ensure confidentiality & integrity of information to be used			
B7 – Has the business suffered any breach of data within the last 6 months (mark with X)	YES	NO	
B8 – Date on which business activities commenced			
B9 – Number of Employees of	2		



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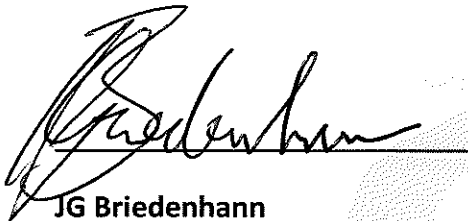
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the Responsible Party	
B10 – Number of Branches in South Africa	1
B11 – Number of Deputy Information Officers designated or delegated	Not applicable

Declaration

This manual is herewith incorporated and signed by Jannie Gysbert Briedenhann on this 12 day of

November 2025 at **BLOEMFONTEIN, FREE STATE.**



JG Briedenhann
Sole director & proprietor



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FORM 6

REQUEST FOR PERMISSION TO PROCESS PERSONAL INFORMATION

Guidance Note of the Information Regulator 11 March 2021

In accordance with Section 58(1) of the Protection of Personal Information Act, 2013

Note:

1. The personal information submitted herein shall be solely used for the purposes of prior authorization application submitted to the Information Regulator ("Regulator") in terms of Section 58(1) of the Protection of Personal Information Act, 2013.
2. All the information submitted herein shall be used for the purpose as stated above, as mandated by law. This information may be disclosed to the public. The Regulator undertakes to ensure that appropriate security measures are implemented to protect all the personal information to be submitted in this document.

A.	ENTITY / RESPONSIBLE PARTY
Type of Entity	Private Company (PTY) Ltd
Full Name of Entity	Briedenhann Properties Pty Ltd
Trading Name	Briedenhann Properties Pty Ltd
Registration Number	2016/13635/07
Full name of Information Officer	Jannie Gysbert Briedenhann
ID Number of Information Officer	8505145115085
Postal Address	1 Mikro Street, Langenhovenpark, District Bloemfontein, Province Free State.
Physical Address	1 Mikro Street, Langenhovenpark, District Bloemfontein, Province Free State.
Landline Number	087 898 0874



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ANNEXURE D – POPI POLICY

1. INTRODUCTION

This data protection and Information Sharing Policy describes the manner that Briedenhann Properties Proprietary Limited, will meet it's legal obligations and requirements concerning confidentiality and information security standards. The requirements within the policy are primarily based upon the Protection of Personal Information Act No 4 of 2013, as that is the key piece legislation covering security and confidentiality or personal information.

1.1 CONTACT DETAILS:

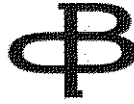
DIRECTOR OF BRIEDENHANN PROPERTIES:	Jannie Gysbert Briedenhann
INFORMATION OFFICER:	Jannie Gysbert Briedenhann
DEPUTY INFORMATION OFFICER:	Not applicable
POSTAL ADDRESS:	1 Mikro Street Langenhovenpark Bloemfontein
TELEPHONE NUMBER :	087 898 0874
EMAIL ADDRESS:	admin@brieprop.co.za

2. DEFINITIONS

Unless the contrary is proven, the following terms will have the following meaning in terms of this Policy:

TERM	MEANING
2.1 Child	Means a natural person under the age of 18 years who is not legally competent, without the assistance of a competent person, to take any action or decision in respect of any matter concerning him or herself;
2.2 Competent Person	Means any person who is legally competent to consent to any action or decision taken in respect of any matter concerning a child.





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2.3 Consent	Means any voluntary, specific and informed expression of will in terms of which permission is given for the processing of personal information;
2.4 Data Subject	Means the person to whom personal information relates to;
2.5 De-identify	In relation to personal information of a data subject, means to delete any information that: (a) identifies the data subject; (b) can be used or manipulated by a reasonably foreseeable method to identify the data subject; or (c) can be linked by a reasonably foreseeable method to other information that identifies the data subject;
2.6 Direct Marketing	means to approach a data subject, either in person or by mail or electronic communication, for the direct or indirect purpose of- (a) Promoting or offering to supply, in the ordinary course of business, any goods or services to the data subject; or (b) requesting the data subject to make a donation of any kind for any reason
2.7 Electronic Communication	means any text, voice, sound or imagery message sent over an electronic communications network which is stored in the network or in the recipient's terminal equipment until it is collected by the recipient;
2.8 Filing System	means any structured set of personal information, whether centralized, decentralized or dispersed on a functional or geographical basis, which is accessible according to a specific criteria;
2.9 Information Officer	of, or in relation to, a- (a) public body means an information officer or deputy information officer as contemplated in terms of Section 1 or 17 of the POPI Act; or (b) private body means the head of a private body as contemplated in Section 1 of the Promotion of Access to Information Act;
2.10 Operator	Means 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;
2.11 Personal Information	Means information relating to an identifiable, living, natural person as fully described in Section 1 of the POPI Act; OR



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	Means information relating to an identifiable, living, natural person as fully described in Section 1 of the POPI Act;
2.12 Processing	Means an operation or activity or any set of operations, whether or not by automatic means, concerning personal information, including- (a) the collection, receipt, recording, organization, collation, storage, updating or modification, retrieval, alteration, consultation or use; (b) dissemination by means of transmission, distribution or making available in any other form; or (c) merging, linking, as well as restriction, degradation, erasure or destruction of information;
2.13 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 (ii) exercising a public power or performing a public function in terms of any legislation.
2.14 Public Record	Means a record that is accessible in the public domain and which is in the possession or under the control of a public body, whether or not it was created by that public body;
2.15 Records	Means any recorded information in whatever form in possession or under the control of the responsible party as per Section 1 of the POPI Act.
2.16 Re-identify	In relation to personal information of a data subject, means to resurrect any information that has been de-identified, that- (a) identifies the data subject; (b) can be used or manipulated by a reasonably foreseeable method to identify the data subject; or (c) can be linked by a reasonably foreseeable method to other information that identifies the data subject
2.17 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;
2.18 Restrictions	Means to withhold from circulation, use of publication any personal information that forms part of a filing system, but not to delete or destroy such information;
2.19 Special Personal Information	Means personal information as referred to in Section 26 of the POPI Act.



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3. SCOPE OF THE POLICY

The policy applies to all Briedenhann Properties Pty Ltd employees, directors, sub-contractors, agents and appointees. The provisions of this policy relates to all measures and controls for all on site processing of personal information. The processing of personal information which takes place off-site, will be on the liability and discrepancy of the contracted party. In terms of off-site processing of personal information, the necessary Non-Disclosure Agreement(s) will be drafted and signed by all the parties which processes personal information on behalf of Briedenhann Properties or its clients on an off-site basis.

4. POLICY STATEMENT

Briedenhann Properties is mandated to collect and use personal information of the individuals and juristic entities with whom they deal with in order to effectively and successfully carry out its business and instructions. The recording of the personal information by an operator will always be relevant and never excessive. In dealing, recording or processing of personal information, Briedenhann Properties Pty Ltd will follow the principle of minimality as per Section 10 of the Protection of Personal Information Act (POPI).

5. PROCESSING OF PERSONAL INFORMATION

5.1 PURPOSE OF PROCESSING

Briedenhann Properties Pty Ltd uses the Personal Information under its care in the following manners:

- If it required for the conclusion or performance of a contract to which the data subject is a party; or
- It is a legal requirement; or
- Detecting and prevention of fraud, crime, money laundering and other malpractice; or
- In connection with legal proceedings; or
- Staff administration; or
- Complying with legal and regulatory requirements.

Collection of personal information must be for a specific, explicitly defined and lawful purpose and the data subject must be aware and take knowledge of the purpose for which the information has to be collected.

The sensitive personal information which is stipulated in Section 26 of the POPI Act, will be required from the individuals as well as juristic entities to whom Fourie Attorneys supply legal services and this information includes but are not limited to:





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- The religious or philosophical beliefs, race or ethnic origin, trade union membership, political persuasion, health or sex life or biometric information of data subject.
- The relevant and required consents and authorization will be given to Fourie Attorneys prior to processing, handling or obtaining such information from a data subject.

5.2 CATEGORIES OF DATA SUBJECT AND THEIR PERSONAL INFORMATION

Briedenhann Properties Pty Ltd may process records relating to clients, staff and contract service providers including the following categories:

ENTITY TYPE	PERSONAL INFORMATION PROCESSED
Clients: Natural Persons	Names; contact details; physical and postal addresses; date of birth; ID Number; tax related information; nationality; gender; confidential correspondence; religious or philosophical beliefs; race or ethnic origin; trade union membership; political persuasion; criminal or biometric behaviour
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; authorized signatories; beneficiaries; ultimate beneficial owners; shareholding information; BBBEE information;
Contracted Service Providers	Names of contact persons; name of legal entity; physical and postal address and contact details; financial information; registration number; found documents; tax related information; authorized signatories; beneficiaries; ultimate beneficial owners; shareholding information; BBBEE information
Employees / Directors	Gender; pregnancy; marital status; race; age; language; educational information; financial information; employment history; ID number and full names; physical and postal address; contact details; opinions; criminal records; disciplinary records; well-being and health information



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5.3 CATEGORIES OF RECIPIENTS FOR PROCESSING THE PERSONAL INFORMATION

Briedenhann Properties Pty Ltd may supply the personal information to any party to whom Fourie Attorneys have assigned or transferred any of its rights or obligations under any agreement, and/or to service providers who render the following services:

- Capturing and organizing of data;
- Storing of data;
- Sending of e-mail and other correspondence to clients, third party service providers, operators, regulators and/or government officials, international service providers and related companies or agents
- Conducting due diligence checks.

5.4 CROSS-BORDER FLOWS OF PERSONAL INFORMATION

Briedenhann Properties Pty Ltd as the responsible party for obtaining and retaining personal information, will not transfer personal information about a data subject to a third party who is in a foreign country unless it can ascertain the following important aspects as per Section 72(1)(a) to Section 72(1)(e) of the POPI Act. Fourie Attorneys will in especially ensure that the consent is received in terms of Section 72(1)(b) from the data subject for the processing, retention and transfer of personal information on a cross-border basis.

5.5 RETENTION OF PERSONAL INFORMATION RECORDS

Briedenhann Properties Pty Ltd may destroy the physical hard copy documentation and files after the retention period has been reached. The retention period will be specified later in the policy.

A data subject also has the right to request that he or she be de-identified in terms of the records that are kept, whether electronically or physically, and a written request received by any of the employees for de-identification of a data subject will be referred to the Information Officer or Deputy Information Officer whereafter the Information Officer will have the sole discretion whether to de-identify and terminate the personal information of the data subject, or alternatively to retain and process the personal information of the data subject and providing the data subject with the legitimate reason for continuance of processing of his or her personal information.

Briedenhann Properties Pty Ltd will retain all of the personal information and necessary consents in terms thereof physically in storage, but in terms of FICA (Financial Intelligence Centre Act, Act 38 of 2001 and as further amended) information as well as data subjects banking details will be retained on the Bookkeeping program of which electronic processing will be governed by a Non-Disclosure Agreement between the Bookkeeping Service Provider and Briedenhann Properties Pty Ltd.



5.6 GENERAL DESCRIPTION OF INFORMATION SECURITY MEASURES

Briedenhann Properties Pty Ltd makes use of the most up to date technology and information systems available to ensure and maintain the integrity and confidentiality of the personal information that it processes of any and all data subjects. The following is a brief explanation as to the measures taken by Briedenhann Properties Pty Ltd to ensure its duty to maintain the integrity and confidentiality of the personal information:

5.6.1 Firewall Protection

- The necessary protection will be given to each computer of Briedenhann Properties Pty Ltd in terms of allowing only the required protocols to be accepted and ensuring that the IT services contracted by Fourie Attorneys deny unneeded firewall protocols.

5.6.2 Virus Protection Software and Updating Protocols

- The necessary protection will be given to each computer of Briedenhann Properties Pty Ltd due to the fact Microsoft Defender Antivirus (alternatively known as Windows Defender Security Centre) is automatically installed through the installation of Windows 10 & 11 as operating system(s).

5.6.3 Logical and Physical Access control where physical files of clients are stored

- The physical retention of all client files containing records of the data subjects will be kept in an ordered and numerical order in a safe and locked up room accessible only to Briedenhann Properties Pty Ltd employees.
- The room will be locked at all times in working hours and will only be accessed should information of a data subject be required for re-identification purposes.

6. ACCESS TO PERSONAL INFORMATION

All individuals and entities may request for an amendment or deletion of their own personal information retained and processed by Briedenhann Properties Pty Ltd. Any requests should be directed, in the prescribed form, to the Information Officer. The Information Officer will have the remedies and options available as set out below once a request has been directed to the information officer:

6.1 INTERNAL REMEDIES

Briedenhann Properties Pty Ltd do not have any internal appeal procedures therefore the decision made by the Information Officer in relation to a request for accessing or obtaining personal information of a data subject will be





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final and binding. Should a written request be received and the Information Officer refuses to give personal information to the requestor, the Information Officer or Deputy Information Officer will supply the requestor with written reasons why the request was denied

6.2 EXTERNAL REMEDIES

Should the requestor not be satisfied with the decision of the Information Officer of Briedenhann Properties Pty Ltd, or should the requestors request be refused and he or she feels the denial to be unreasonable or unlawful, he or she will need to seek external remedies at their disposal in terms of the personal information request given to the Information Officer of Briedenhann Properties Pty Ltd. These external remedies include but are not limited to approaching the Information Regulator of South Africa or alternatively approaching a competent Court or Tribunal for the sought-after relief.

6.3 GROUNDS OF REFUSAL

Briedenhann Properties Pty Ltd have the right to refuse access to a requested record that is confidential and that falls within the scope of legal professional privilege, the grounds on which Fourie Attorneys may refuse access include:

- Protecting Personal Information that Briedenhann Properties Pty Ltd are in possession of relating a third person (who is a natural person) including a deceased person from any unreasonable and sensitive disclosures;
- If disclosure of the record would result in a breach of a duty of confidence;
- If disclosure of the record could have the effect that an individuals' life or physical safety may be compromised;
- If disclosure of the record would prejudice or impair the security of a property;
- If disclosure of the record would prejudice or impair the protection of an individual in accordance with a witness protection scheme;
- If disclosure of the record would prejudice or impair the protection and safety of the public and non-disclosure will be in public interest.
- Disclosure of the records (containing trade secrets, financial, commercial, scientific, or technical information) would harm the commercial or financial interests of Fourie Attorneys;
- Disclosure of the record would put Briedenhann Properties Pty Ltd at a disadvantage in contractual or other negotiations or prejudicing Briedenhann Properties Pty Ltd in any way;
- The record is a computer software program or is kept and recorder on a computer software program.



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6.4 RECORDS THAT CAN NOT BE FOUND OR DO NOT EXIST

Should Briedenhann Properties Pty Ltd have done due diligence in terms of looking for a record, whether in electronic or physical form, and Briedenhann Properties Pty Ltd is of the bona fide belief that the record does not exist, is unobtainable or has already been destroyed, the requestor will be notified by way of an affidavit or affirmation from the Information Officer or Deputy Information Officer.

7. IMPLEMENTATION GUIDELINES

7.1 TRAINING AND DISSEMINATION OF PERSONAL INFORMATION

This policy has been put in place throughout Briedenhann Properties Pty Ltd and training on the policy implemented will take place with all employees which will access and process Personal Information.

Upon induction of all new employees, the employees will be made aware of the responsibilities which they are obligated to fulfil in, in terms of the POPI Act and they will be given a training manual explaining the process and manner in which Fourie Attorneys employees are obligated to do due diligence in terms of the POPI Act. Regular follow up trainings will be conducted as set out in the training manuals to be received.

7.2 EMPLOYEE CONTRACTS

Each new employee will sign an Employment Contract which will include the necessary consent clauses for the processing, recording and storing of employees' personal information. Included in the Employment Contract is an undertaking from the employee to ensure that there are no breaches of confidentiality in terms of any personal information, whether stored electronically or physically. Failure to comply with this undertaking in terms of the employment contract will initiate disciplinary procedures in terms of the employment contract.

8. EIGHT PROCESSING CONDITIONS

Briedenhann Properties Pty Ltd shall ensure that all eight processing conditions, as set out in POPI, are complied with in especially Section 8 to Section 25 which further specifies the manner and extent to which processing must take place in terms of the following principles:

8.1 ACCOUNTABILITY

Briedenhann Properties Pty Ltd shall ensure that all processing conditions, as set out in the POPI Act, are complied with when determining the purpose and means of processing personal information and during the processing itself.



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8.2 PROCESSING LIMITATION

The processing of personal information is only lawful if, given the purpose of processing, the information is adequate, relevant and not excessive.

Briedenhann Properties Pty Ltd undertakes to comply with the POPI Act in more specifically the terms of processing limitation as per Section 9 to 12.

Briedenhann Properties Pty Ltd undertakes to gain written consent where appropriate and required by law.

All data subject has the right to refuse or withdraw their consent to the processing of their personal information, and a data subject may object, at any time to the processing of their personal information on any of the grounds as set out in condition 2 of the POPI Act, unless legislation provides for such processing. If the data subject withdraws consent or objects to processing the Briedenhann Properties Pty Ltd shall forthwith refrain from processing the personal information.

8.3 PURPOSE SPECIFICATION

Briedenhann Properties Pty Ltd shall only process Personal Information for the specific purpose as set out and defined above at paragraph 5.1

8.4 FURTHER PROCESSING

New processing activity must be compatible with original purpose of processing.

Further processing will be regarded as compatible with the purpose of collection if:

- Data subject has consented to the further processing;
- Personal information is contained in a public record;
- Personal information has been deliberately, made public by the data subject;
- Further processing is required to comply with or exercise any law or legal right;
- Further processing is necessary to prevent or mitigate a threat to public health or safety, or the life or health of the data subject or a third party.

8.5 INFORMATION QUALITY

Briedenhann Properties Pty Ltd shall take reasonable steps to ensure that Personal Information is complete, accurate, not misleading and updated. Briedenhann Properties Pty Ltd shall periodically review data subjects' records to ensure that the personal information is still valid and correct.

Employees should as far as reasonably practicably follow the following guidance when collecting Personal Information:





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- Personal Information should be dated when received;
- A record should be kept of from who and where the Personal Information was obtained;
- Changed to information records should be dated;
- Irrelevant or unneeded Personal Information should be deleted or destroyed;
- Personal Information should be stored securely, either on a secure electronic database or a secure physical filing system.

8.6 OPENNESS

Briedenhann Properties Pty Ltd shall take reasonable steps ensure that the data subject is made aware of:

- What Personal Information is collected, and the source of the information;
- The purpose of collection and processing;
- Where the supply of Personal Information is voluntary or mandatory; and the consequences of a failure to provide such information;
- Whether collection is in terms of any law requiring such collection;
- Whether the Personal Information shall be shared with any third party.

8.7 DATA SUBJECT PARTICIPATION

Data subject has the right to request access to, amendment, or deletion of their Personal Information.

All such requests must be submitted in writing to the Information Officer. Unless there are grounds for refusal as set out in paragraph 6.3 above, the Group shall disclose the requested Personal Information:

- On receipt of adequate proof of identity from the Data Subject, or requestor;
- Within reasonable time;
- On receipt of the prescribed fee, if any;
- In a reasonable format.

Briedenhann Properties Pty Ltd shall not disclose any Personal Information to any party unless the identity of the requestor has been verified.

8.8 SECURITY SAFEGUARDS

Briedenhann Properties Pty Ltd shall ensure the integrity and confidentiality of all Personal Information in its possession, by taking reasonable steps to:

- Identify all reasonably foreseeable risks to information security;
- Establish and maintain appropriate safeguards against such risks;

8.8.1 WRITTEN RECORDS

- Personal Information records should be kept in locked cabinets, or safes;



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- When in use Personal Information records should not be left unattended in areas where non-staff members may access them;
- Briedenhann Properties Pty Ltd shall implement and maintain a "Clean Desk Policy" where all employees shall be required to clear their desk of all Personal Information when leaving their desks for any length of time and at the end of the day;
- Personal Information which is no longer required should be disposed of by shredding.

Any loss or theft of, or unauthorized access to, Personal Information must be immediately reported to the Information Officer.

8.8.2 ELECTRONIC RECORDS

- All electronically held Personal Information must be saved in a secure database;
- As far as reasonably practicable, no Personal Information should be saved on individual computers, laptops and handheld devices;
- All computer, laptops, and hand-held devices should be access protected with a password, fingerprint or retina scan, with the password being reasonable complexity and changed frequently;
- Briedenhann Properties Pty Ltd shall implement and maintain a "Clean Desk Policy" where all employees shall be required to lock their computers or laptops when leaving their desks for any length of time and to log off at the end of the day;
- Personal Information which is in electronic format which is no longer required must be de-identified from the laptop, computer or access point on the relevant software. The employee must ensure that the information has holistically been de-identified and is irrecoverable.

Any loss or theft of computers, laptops or other devices which may contain Personal Information must be reported immediately to the Information Officer who shall notify the IT contractors in writing so that the IT Contractors can take all necessary steps to remotely de-identify or destroy any records if it is possible for them to do so.

9. DESTRUCTION OF DOCUMENTS

- 9.1 Documents may be destroyed after the termination of the retention period specified statutory or as determined by Briedenhann Properties Pty Ltd.
- 9.2 Each department is responsible for attending to the destruction of its documents and electronic records, which must be done on a regular basis. Files must be checked in order to make sure that they may be destroyed and also to ascertain if there are important original documents in the file. Original documents must be returned to the holder therefore, failing which, they should be retained by Briedenhann Properties Pty Ltd pending such return.
- 9.3 The documents must be made available for collection by Shred-It, or other approved document disposal company.
- 9.4 Deletion of electronic records must be done in consultation with the IT Department, to ensure that deleted information is incapable of being reconstructed and/or recovered.



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10. POLICY REVIEW

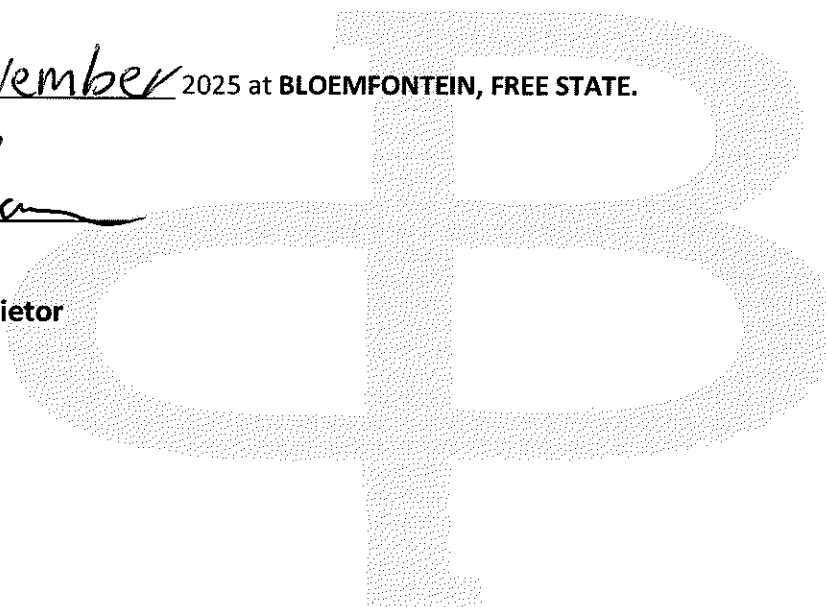
The Information Officer is responsible for an annual review to be completed prior to the anniversary date. As part of the annual review, the Information Officer of Briedenhann Properties Pty Ltd will ensure that the relevant sub-contractors are consulted with prior to the anniversary date. If there are no changes it will be noted and the policy will continue for another 12 months.

Declaration

This policy is herewith incorporated and signed by **Jannie Gysbert Briedenhann** on this

12 day of November 2025 at **BLOEMFONTEIN, FREE STATE.**

JG Briedenhann
Sole director & proprietor
Information Officer



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