

ROBERTS



INCORPORATED

PAIA AND POPIA MANUAL

David Roberts Attorneys Inc t/a Roberts Inc
Registration number 2015/391877/21

Prepared in terms of section 51 of the Promotion of Access to Information Act 2 of 2000 and the Regulations relating to the Promotion of Access to Information, 2021, and incorporating the requirements of the Protection of Personal Information Act 4 of 2013

Note: This Manual is published to comply with the statutory obligations of Roberts Inc and to inform requesters of the procedure for requesting access to records. It is not legal advice to any person. Roberts Inc reviews and updates this Manual from time to time; the version published on its website is the current version. Roberts Inc shall not be liable for any loss or damage arising from reliance on an outdated copy of this Manual.

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1. ABBREVIATIONS AND DEFINITIONS

Term	Meaning
Constitution	Constitution of the Republic of South Africa, 1996
Data subject	The person (natural or juristic) to whom personal information relates
Guide	The Guide on how to use PAIA, compiled and published by the Information Regulator in terms of section 10 of PAIA
Information Officer	The head of Roberts Inc as contemplated in section 1 of PAIA, read with section 55 of POPIA
Information Regulator	The Information Regulator established in terms of section 39 of POPIA, which took over the PAIA functions previously performed by the SAHRC
Manual	This manual, compiled in terms of section 51 of PAIA
PAIA	Promotion of Access to Information Act 2 of 2000, as amended
PAIA Regulations	Regulations relating to the Promotion of Access to Information, 2021 (GN R757 in GG 45057 of 27 August 2021)
POPIA	Protection of Personal Information Act 4 of 2013
POPIA Regulations	Regulations relating to the Protection of Personal Information, 2018
Processing	Any operation or activity concerning personal information, from collection to destruction, whether manual or automated, as defined in section 1 of POPIA
Roberts Inc / the firm	David Roberts Attorneys Inc t/a Roberts Inc (registration number 2015/391877/21)

2. INTRODUCTION AND PURPOSE OF THIS MANUAL

- 2.1 PAIA gives effect to the constitutional right of access to any information held by the State, and to any information held by another person that is required for the exercise or protection of any rights (section 32 of the Constitution).
- 2.2 In terms of section 50 of PAIA, a requester must be given access to a record of a private body if the record is required for the exercise or protection of any rights, the requester complies with the procedural requirements of PAIA, and access is not refused on any ground set out in Chapter 4 of Part 3 of PAIA.
- 2.3 Section 51 of PAIA, as amended by POPIA, requires every private body to compile a manual. This Manual:
- 2.3.1 sets out the particulars of Roberts Inc and its Information Officer;
 - 2.3.2 describes the Guide and where it may be obtained;
 - 2.3.3 describes the records held by Roberts Inc and those available without a formal request;
 - 2.3.4 explains how to request access to a record, the prescribed fees, the grounds on which access may be refused, and the remedies available; and
 - 2.3.5 describes how Roberts Inc processes personal information, as required by section 51(1)(c) of PAIA and POPIA.

3. PARTICULARS OF ROBERTS INC

Item	Detail
Name	David Roberts Attorneys Inc t/a Roberts Inc

Item	Detail
Registration number	2015/391877/21
Type of entity	Personal liability company incorporated in terms of section 8(2)(c) of the Companies Act 71 of 2008, practising as attorneys, notaries and conveyancers in terms of the Legal Practice Act 28 of 2014
Nature of business	Conveyancing and property law (property transfers, bond registrations and cancellations, sectional title and development work), notarial services and related legal services
Head of private body	David Benjamin Roberts, Managing Director and sole director
Physical address	Ground Floor, 21 Blaauwberg Road, Table View, Cape Town, Western Cape, 7441
Postal address	Same as physical address
Telephone	021 556 5568
Cell	082 882 5999
E-mail	david@robertsinc.co.za
Website	www.robertsinc.co.za

4. INFORMATION OFFICER

- 4.1 In terms of PAIA and POPIA, the head of a private body is its Information Officer. The Information Officer of Roberts Inc is its Managing Director and sole director, Mr David Benjamin Roberts, whose details are:

Information Officer	David Benjamin Roberts (Managing Director and sole director)
Physical and postal address	Ground Floor, 21 Blaauwberg Road, Table View, Cape Town, Western Cape, 7441
Telephone	021 556 5568
Cell	082 882 5999
E-mail	david@robertsinc.co.za

- 4.2 The registration of the Information Officer with the Information Regulator in terms of section 55(2) of POPIA is being finalised. The Information Officer is responsible for the functions set out in PAIA, section 55 of POPIA and regulation 4 of the POPIA Regulations, including compliance with POPIA, dealing with requests made under PAIA and POPIA, and working with the Information Regulator in relation to any investigation.
- 4.3 Given the size of Roberts Inc, no Deputy Information Officer has been designated at present. The Information Officer may designate one or more Deputy Information Officers in terms of section 56 of PAIA and section 56 of POPIA, and will register any such designation with the Information Regulator.
- 4.4 All requests for access to records, and all queries relating to this Manual or to the processing of personal information by Roberts Inc, must be addressed to the Information Officer.

5. THE INFORMATION REGULATOR'S GUIDE ON HOW TO USE PAIA (SECTION 51(1)(b))

- 5.1 The Information Regulator has, in terms of section 10(1) of PAIA, updated and made available the Guide on how to use PAIA, in an easily comprehensible form and manner, as may reasonably be required by a person who wishes to exercise any right contemplated in PAIA and POPIA. (Responsibility for the Guide was transferred from the South African Human Rights Commission to the Information Regulator with effect from 30 June 2021.)
- 5.2 The Guide is available in each of the official languages and in braille, and contains, among other things, the objects of PAIA and POPIA; the contact details of information officers; the manner and form of a request for access; the assistance available from the Information Regulator; and the remedies available to requesters.
- 5.3 Members of the public may inspect or make copies of the Guide, free of charge, from the offices of public and private bodies (including the office of Roberts Inc) and from the Information Regulator, during normal working hours. A copy may also be requested from the Information Officer using Form 1 of the PAIA Regulations (Request for a copy of the Guide), or downloaded from the Information Regulator's website.
- 5.4 The contact details of the Information Regulator are:

Physical address	Woodmead North Office Park, 54 Maxwell Drive, Woodmead, Johannesburg, 2191
Telephone	010 023 5200 / toll free 0800 017 160
General enquiries	enquiries@inforegulator.org.za
PAIA complaints	PAIAComplaints@inforegulator.org.za
POPIA complaints	POPIAComplaints@inforegulator.org.za
Website	www.inforegulator.org.za

6. RECORDS AUTOMATICALLY AVAILABLE (SECTION 52)

- 6.1 No notice has been published by Roberts Inc in terms of section 52(2) of PAIA regarding categories of records that are automatically available without a person having to request access in terms of PAIA.
- 6.2 The following records are nonetheless available without a formal PAIA request, subject only to payment of the prescribed reproduction fee (if any) where copies are required:
- 6.2.1 information published on the Roberts Inc website, www.robertsinc.co.za (including this Manual);
 - 6.2.2 brochures, newsletters, articles and other marketing or informational material published by Roberts Inc;
 - 6.2.3 records of a public nature, including statutory records lodged with the Companies and Intellectual Property Commission (CIPC); and
 - 6.2.4 other non-confidential records which Roberts Inc chooses to make available.
- 6.3 Requests for these records should be directed to the Information Officer. Where records are to be inspected rather than copied, an appointment must be made with the Information Officer.

7. RECORDS AVAILABLE IN TERMS OF OTHER LEGISLATION (SECTION 51(1)(d))

7.1 Roberts Inc keeps records in accordance with, among others, the following legislation (as amended), and regulations and rules made under it. Where disclosure is not prohibited by law, contract or otherwise, records that are required to be made available in terms of such legislation will be made available to persons entitled to them, in accordance with that legislation and this Manual:

- Alienation of Land Act 68 of 1981
- Basic Conditions of Employment Act 75 of 1997
- Broad-Based Black Economic Empowerment Act 53 of 2003
- Companies Act 71 of 2008
- Compensation for Occupational Injuries and Diseases Act 130 of 1993
- Competition Act 89 of 1998
- Constitution of the Republic of South Africa, 1996
- Consumer Protection Act 68 of 2008
- Copyright Act 98 of 1978
- Cybercrimes Act 19 of 2020
- Deeds Registries Act 47 of 1937
- Electronic Communications Act 36 of 2005
- Electronic Communications and Transactions Act 25 of 2002
- Employment Equity Act 55 of 1998
- Financial Intelligence Centre Act 38 of 2001
- Identification Act 68 of 1997
- Income Tax Act 58 of 1962
- Labour Relations Act 66 of 1995
- Legal Practice Act 28 of 2014 and the Rules of the Legal Practice Council
- Occupational Health and Safety Act 85 of 1993
- Prescription Act 68 of 1969
- Prevention of Organised Crime Act 121 of 1998
- Promotion of Access to Information Act 2 of 2000
- Protection of Constitutional Democracy against Terrorist and Related Activities Act 33 of 2004
- Protection of Personal Information Act 4 of 2013
- Regulation of Interception of Communications and Provision of Communication-Related Information Act 70 of 2002
- Sectional Titles Act 95 of 1986
- Sectional Titles Schemes Management Act 8 of 2011
- Skills Development Levies Act 9 of 1999
- Tax Administration Act 28 of 2011
- Transfer Duty Act 40 of 1949
- Unemployment Insurance Act 63 of 2001
- Unemployment Insurance Contributions Act 4 of 2002
- Value-Added Tax Act 89 of 1991

7.2 This list may not be complete. A requester who believes a right of access to a record exists in terms of other legislation must identify that legislation in the request, so that the Information Officer may consider the request accordingly. Access to records requested in terms of other legislation remains subject to the grounds of refusal in section 11 of this Manual.

8. SUBJECTS AND CATEGORIES OF RECORDS HELD BY ROBERTS INC (SECTION 51(1)(e))

8.1 Roberts Inc holds records in the following subjects and categories. Listing a category does not mean that records in that category will be made available; every request is subject to the procedure and grounds of refusal set out in this Manual.

Subject	Categories of records
Company and statutory records	Memorandum of Incorporation; CIPC registration documents and annual returns; register of directors; minutes and resolutions; B-BBEE records; Legal Practice Council records and Fidelity Fund certificates
Financial records	Accounting records; annual financial statements; general and subsidiary ledgers; asset registers; debtors and creditors records; invoices and statements; banking records; budgets; insurance policies; lease and rental agreements; contracts with suppliers and service providers
Trust accounting records	Trust banking records; trust ledgers and reconciliations; investment records; auditor's reports on trust accounts and related records kept in terms of the Legal Practice Act and the Rules of the Legal Practice Council
Tax records	Income tax, provisional tax, VAT, PAYE, SDL and UIF records and returns; correspondence with SARS; transfer duty records
Personnel records	Employment contracts; personal details of personnel; payroll and remuneration records; leave records; disciplinary and performance records; training records; employment equity records; COIDA and UIF records; candidate attorney records
Client and matter records	Client instructions and mandates; offers to purchase, deeds of sale and addenda; title deeds, bond and cancellation documents; deeds office lodgement records; clearance certificates; guarantees; client identity verification and other FICA records; fee and disbursement records; correspondence; file notes; draft and final agreements and pleadings
Operational and marketing records	Correspondence with estate agents, financial institutions, municipalities, bodies corporate, homeowners' associations and other attorneys; referral and marketing records; website and social media records
Information technology records	Computer and mobile device usage policies; information security policies and procedures; hardware asset registers; software licences; backup and disaster recovery plans; system documentation and manuals

- 8.2 In this section, "personnel" means any person who works for, provides services to or on behalf of, or assists in conducting the business of Roberts Inc and who receives or is entitled to receive remuneration, including directors, permanent, temporary and part-time staff, candidate attorneys and contract workers.
- 8.3 Many records held by Roberts Inc are protected by legal professional privilege, attorney-client confidentiality or the privacy rights of clients and third parties. Access to such records will be refused unless the person entitled to the privilege or confidentiality waives it, or the law otherwise requires disclosure.

9. PROCESSING OF PERSONAL INFORMATION (SECTION 51(1)(c) READ WITH POPIA)

- 9.1 **Purpose of processing.** Roberts Inc processes personal information for the following purposes:
- 9.1.1 rendering legal, conveyancing and notarial services, including the transfer of immovable property, the registration and cancellation of bonds and related transactions;
 - 9.1.2 complying with legal and regulatory obligations, including client identification and verification and reporting obligations under the Financial Intelligence Centre Act, deeds registration requirements, tax laws and the Legal Practice Act;

- 9.1.3 keeping trust and business accounting records and administering payments, guarantees and disbursements;
- 9.1.4 employment and personnel administration, including recruitment and payroll;
- 9.1.5 managing relationships with clients, estate agents, suppliers and service providers, including communication and, where lawful, direct marketing; and
- 9.1.6 protecting the legitimate interests of Roberts Inc, its clients and third parties, including in litigation and the establishment, exercise or defence of legal claims.

9.2 Categories of data subjects and of personal information.

Data subjects	Personal information processed
Clients (sellers, purchasers, mortgagors and other parties) and their spouses, representatives, trustees, directors and members	Names; identity or passport numbers; dates of birth; marital status and matrimonial property regime; contact details; residential and postal addresses; tax and income tax reference numbers; banking details; financial information relating to the transaction; FICA verification documents; property details; correspondence
Juristic persons and trusts	Registered names and numbers; registered addresses; details of directors, members, trustees and beneficial owners; tax and VAT numbers; banking details; resolutions and authorisations
Personnel and job applicants	Names; identity numbers; contact details; qualifications and employment history; remuneration and banking details; tax numbers; leave and performance records; next of kin; and, where required by law, special personal information such as race (for employment equity purposes) and health information
Estate agents, other attorneys and conveyancers, financial institutions and service providers	Names; contact details; business details; registration numbers; banking details where payment is required; correspondence
Website visitors and persons who contact the firm	Names, contact details and the content of enquiries; technical information collected through the website

9.3 Recipients or categories of recipients. Depending on the matter, Roberts Inc may supply personal information to:

- 9.3.1 the Registrar of Deeds and other conveyancers involved in the transaction (including bond and cancellation attorneys);
- 9.3.2 banks and other financial institutions, and mortgage originators;
- 9.3.3 the South African Revenue Service, the Financial Intelligence Centre, the Legal Practice Council, the Legal Practitioners' Fidelity Fund and other regulators, where required by law;
- 9.3.4 municipalities, bodies corporate, homeowners' associations and their managing agents;
- 9.3.5 estate agents and property practitioners involved in the transaction;
- 9.3.6 correspondent attorneys, lodging agents, advocates, commissioners of oaths, courts and sheriffs;
- 9.3.7 auditors, accountants, insurers and professional advisers of Roberts Inc; and
- 9.3.8 information technology, cloud, software, document-storage and communication service providers acting as operators on behalf of Roberts Inc, subject to written agreements requiring them to keep the information confidential and secure, as required by sections 20 and 21 of POPIA.

- 9.4 **Planned transborder flows.** Roberts Inc does not plan to transfer personal information to third parties in foreign countries, except to the extent that information is stored or processed on cloud-based email, software or storage services whose servers may be located outside South Africa. Any such transfer will be made only in accordance with section 72 of POPIA, including where the recipient is subject to a law, binding corporate rules or a binding agreement that provides an adequate level of protection.
- 9.5 **Security measures.** Roberts Inc has implemented appropriate, reasonable technical and organisational measures to secure the integrity and confidentiality of personal information, as required by section 19 of POPIA, including:
- 9.5.1 access to information systems controlled by unique user accounts and passwords, limited to personnel who need access;
 - 9.5.2 firewalls, anti-virus and anti-malware software, and regular software updates;
 - 9.5.3 regular backups and disaster recovery arrangements;
 - 9.5.4 physical security of premises and secure storage of paper files and title deeds;
 - 9.5.5 confidentiality obligations in employment contracts and operator agreements, and staff awareness of POPIA, FICA and cybersecurity risks (including payment-fraud and phishing risks); and
 - 9.5.6 procedures for identifying and responding to security compromises, including notification to the Information Regulator and affected data subjects in terms of section 22 of POPIA.
- 9.6 **Retention.** Personal information is kept only for as long as necessary for the purpose for which it was collected, or as required by law (including the record-keeping periods under the Financial Intelligence Centre Act, tax legislation and the Rules of the Legal Practice Council), after which it is destroyed, deleted or de-identified in accordance with section 14 of POPIA.

10. PROCEDURE FOR REQUESTING ACCESS TO RECORDS

- 10.1 A request for access to a record of Roberts Inc must be made on **Form 2 (Request for Access to Record)** of Annexure A to the PAIA Regulations, which is available on the Information Regulator's website (www.inforegulator.org.za) and from the Information Officer. The repealed Form C (J752) is no longer valid.
- 10.2 The completed form must be delivered to the Information Officer by hand, by post or by e-mail to david@robertsinc.co.za, with the words "PAIA Request" in the subject line.
- 10.3 The requester must provide sufficient particulars to enable the Information Officer to identify:
- 10.3.1 the record or records requested;
 - 10.3.2 the identity of the requester;
 - 10.3.3 the form of access required;
 - 10.3.4 the requester's postal address, e-mail address or other contact details in the Republic;
 - 10.3.5 if the requester wishes to be informed of the decision in a manner other than in writing, that manner and the necessary particulars; and
 - 10.3.6 the right which the requester is seeking to exercise or protect, with an explanation of why the record is required to exercise or protect that right.
- 10.4 If a request is made on behalf of another person, the requester must submit proof, to the reasonable satisfaction of the Information Officer, of the capacity in which the request is made (section 53(2)(f) of PAIA).
- 10.5 A requester who is unable to complete the form because of illiteracy or a disability may make the request orally, and the Information Officer will assist the requester to reduce it to writing.

- 10.6 A requester (other than a personal requester) must pay the prescribed request fee before the request is processed. Time periods do not begin to run until the request is complete and the request fee has been paid.
- 10.7 Where a request relates to a record containing information about a third party, the Information Officer will take all reasonable steps to notify that third party in terms of section 71 of PAIA. The third party may, within 21 days, make written or oral representations as to why the request should be refused, or consent to disclosure.
- 10.8 **Personal requesters.** A requester who seeks access to a record containing personal information about that requester is not required to pay the request fee, but may be required to pay the access fee for reproduction.
- 10.9 Where part of a record may be disclosed and part must or may be refused, the Information Officer will sever the record and grant access only to the part that may be disclosed (section 59 of PAIA).

11. GROUNDS FOR REFUSAL OF ACCESS

- 11.1 Roberts Inc may or must refuse access to a record on the grounds set out in Chapter 4 of Part 3 of PAIA (sections 62 to 70), which include:
 - 11.1.1 mandatory protection of the privacy of a third party who is a natural person, including a deceased person, where disclosure would involve the unreasonable disclosure of personal information (section 63);
 - 11.1.2 mandatory protection of the commercial information of a third party, including trade secrets, financial, commercial, scientific or technical information whose disclosure would likely cause harm, and information supplied in confidence whose disclosure could disadvantage that third party (section 64);
 - 11.1.3 mandatory protection of confidential information of third parties where disclosure would breach a duty of confidence owed in terms of an agreement (section 65);
 - 11.1.4 mandatory protection of the safety of individuals and the protection of property (section 66);
 - 11.1.5 mandatory protection of records privileged from production in legal proceedings, including legal professional privilege, unless the privilege is waived (section 67);
 - 11.1.6 protection of the commercial information of Roberts Inc, including trade secrets, information whose disclosure would likely cause harm to its financial or commercial interests, and information whose disclosure could put it at a disadvantage in negotiations or commercial competition (section 68); and
 - 11.1.7 protection of research information of Roberts Inc or a third party (section 69).
- 11.2 Despite these grounds, access must be granted where disclosure would reveal evidence of a substantial contravention of, or failure to comply with, the law, or an imminent and serious public safety or environmental risk, and the public interest in disclosure clearly outweighs the harm contemplated (section 70).
- 11.3 Access to records containing personal information, and in particular special personal information, will also be considered in light of the conditions for lawful processing in POPIA, including sections 26 to 33.
- 11.4 A request that is manifestly frivolous or vexatious, or which would involve an unreasonable diversion of resources, may be refused (section 45, applied to private bodies by analogy and in terms of the Guide).
- 11.5 If a requested record cannot be found or does not exist, the Information Officer will notify the requester by way of an affidavit or affirmation, setting out all steps taken to find the record (section 55). Such notice is regarded as a refusal of the request. If the record is later found, access will be given unless a ground of refusal applies.

12. PRESCRIBED FEES (SECTION 51(1)(f))

12.1 The fees payable are those prescribed for private bodies in Annexure B to the PAIA Regulations, as follows:

Item	Description	Amount
1	Request fee, payable by every requester other than a personal requester	R140.00
2	Photocopy of an A4-size page	R2.00 per page or part thereof
3	Printed copy of an A4-size page	R2.00 per page or part thereof
4	Copy in computer-readable form on: (i) flash drive (to be provided by the requester) (ii) compact disc provided by the requester (iii) compact disc provided to the requester	R40.00 R40.00 R60.00
5	Transcription of visual images, per A4-size page or part thereof	Service to be outsourced; fee depends on the service provider's quotation
6	Copy of visual images	Service to be outsourced; fee depends on the service provider's quotation
7	Transcription of an audio record, per A4-size page or part thereof	R24.00
8	Copy of an audio record on: (i) flash drive (to be provided by the requester) (ii) compact disc provided by the requester (iii) compact disc provided to the requester	R40.00 R40.00 R60.00
9	Search for and preparation of the record for disclosure, for each hour or part of an hour, excluding the first hour, reasonably required	R145.00 per hour, to a maximum of R435.00
10	Deposit, where the search exceeds 6 hours	One third of the amount per request, calculated in terms of items 2 to 8
11	Postage, e-mail or any other electronic transfer	Actual expense, if any

12.2 Roberts Inc is a registered VAT vendor and may add VAT to the prescribed fees. No fee exceeding the prescribed fee will be charged.

12.3 The Information Officer will, by notice, require a requester (other than a personal requester) to pay the request fee before the request is processed. If the search and preparation of the record will take more than the prescribed six hours, the requester will be required to pay the deposit before the request is processed.

12.4 If access is granted, the requester must pay the access fee (less any deposit paid) before access is given, and the Information Officer may withhold the record until all fees have been paid. If access is refused, any deposit paid will be refunded.

12.5 A requester may lodge a complaint with the Information Regulator, or apply to court, against the payment of the request fee, the deposit or the access fee.

13. DECISION AND TIME PERIODS

- 13.1 The Information Officer will, as soon as reasonably possible and in any event within 30 days after receipt of a complete request, decide whether to grant or refuse the request and notify the requester in writing (or in the manner requested) of the decision, using Form 3 of the PAIA Regulations where applicable.
- 13.2 The 30-day period may be extended once, for a further period of not more than 30 days, if the request is for a large number of records, requires a search through a large number of records, requires a search for records held at another office, requires consultation that cannot reasonably be completed within 30 days, or the requester consents in writing (section 57). The requester will be notified in writing of any extension, the reasons for it, and the right to lodge a complaint with the Information Regulator against the extension.
- 13.3 If access is refused, the notice will state adequate reasons for the refusal (excluding any reference to the content of the record) and will inform the requester of the right to lodge a complaint with the Information Regulator or to apply to court.
- 13.4 If the Information Officer fails to give a decision within the required period, the request is regarded as having been refused (section 58).

14. REMEDIES

- 14.1 **No internal appeal.** Roberts Inc is a private body and has no internal appeal procedure. The decision of the Information Officer is final as far as Roberts Inc is concerned.
- 14.2 **Complaint to the Information Regulator.** A requester or third party aggrieved by a decision of the Information Officer (including a refusal, a deemed refusal, a decision on fees, an extension or the form of access) may, within 180 days of the decision, lodge a complaint with the Information Regulator in terms of section 77A of PAIA, using Form 5 of the PAIA Regulations (PAIA Complaint Form), at PAIAComplaints@inforegulator.org.za.
- 14.3 **Application to court.** In terms of section 78 of PAIA, a requester or third party may apply to court for appropriate relief only after exhausting the complaints procedure before the Information Regulator. An application to court must be brought within 180 days. For the purposes of PAIA, the courts with jurisdiction include the High Court and a Magistrates' Court designated by the Minister of Justice and Constitutional Development.

15. RIGHTS OF DATA SUBJECTS UNDER POPIA

- 15.1 A data subject whose personal information is processed by Roberts Inc has the rights set out in section 5 of POPIA, including the right to:
 - 15.1.1 be notified that personal information is being collected, or that it has been accessed or acquired by an unauthorised person;
 - 15.1.2 establish whether Roberts Inc holds personal information about them and request access to it (section 23 of POPIA, read with this Manual);
 - 15.1.3 request the correction, destruction or deletion of personal information, using Form 2 of the POPIA Regulations (section 24);
 - 15.1.4 object to the processing of personal information on reasonable grounds, or to processing for direct marketing, using Form 1 of the POPIA Regulations (section 11(3));
 - 15.1.5 not be subjected to unsolicited electronic direct marketing except as permitted by section 69 of POPIA; and
 - 15.1.6 lodge a complaint with the Information Regulator at POPIAComplaints@inforegulator.org.za, and institute civil proceedings.

- 15.2 Requests and objections under POPIA must be addressed to the Information Officer. Roberts Inc may be required by law, including the Financial Intelligence Centre Act and the Rules of the Legal Practice Council, to retain certain records despite a request for deletion.

16. AVAILABILITY AND UPDATING OF THIS MANUAL

- 16.1 This Manual is available, in accordance with section 51(3) of PAIA and the PAIA Regulations:
- 16.1.1 on the Roberts Inc website, www.robertsinc.co.za;
 - 16.1.2 at the offices of Roberts Inc for public inspection during normal business hours;
 - 16.1.3 to any person on request, on payment of a reasonable amount where a copy is required; and
 - 16.1.4 to the Information Regulator on request.
- 16.2 Roberts Inc will review this Manual regularly and update it whenever there is a material change to its particulars, records, processing activities or the applicable law.

Revised and approved on 19 October 2026.

D. Roberts

David B. Roberts

Managing Director and Information Officer

david@robertsinc.co.za