

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

1 COMPANY DETAILS

1.1	Full name:	Cubisol Holdings (Pty) Ltd
1.2	Registration number:	2011/144316/07
1.3	Physical Address:	SG101A, South Wing, Great Westerford, 240 Main Road, Newlands, Western Cape, 7700
1.4	Postal Address:	P.O. Box 33856, Claremont, Cape Town, Western Cape, 7735
1.5	Telephone:	021 659 7070
1.6	Head of Company:	Andre Paul Forest von Bulow
1.7	Email:	andre@propsmith.co.za
1.8	Website	www.cubisol.co.za

2 PRIMARY BUSINESS

Holding company with subsidiaries that invest in immovable property

3 DIRECTORS

Andre Paul Forest von Bulow

Gerald John Porter

4 INFORMATION OFFICER

Name: Andre Paul Forest von Bulow

Email: andre@propsmith.co.za

5 GUIDE IN TERMS OF SECTION 10 OF THE ACT

- 4.1 The section 10 Guide on how to use the Promotion of Access to Information Act No 2 of 2000 (“Act”) is available from the Information Regulator and is available on their website at <https://inforegulator.org.za/paia-guidelines/>.

4.2 A copy of the guide is also available in English and Afrikaans for public inspection during normal office hours.

4.3 Enquiries can be directed to:

4.3.1 The Information Regulator

4.3.2 Address: JD House, 27 Stiemens Street, Braamfontein, Johannesburg.

4.3.3 Website: <https://info regulator.org.za/>

4.3.4 Email: enquiries@info regulator.org.za

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

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

5.1 Companies Act 71 of 2008;

5.2 Financial Intelligence Centre Act 38 of 2001;

5.3 Income Tax Act 58 of 1962;

5.4 Insolvency Act 24 of 1936;

5.5 Labour Relations Act 66 of 1995;

5.6 Occupational Health and Safety Act 85 of 1993;

5.7 Pension Funds Act 24 of 1956;

5.8 Skills Development Act 97 of 1998;

5.9 Trade Marks Act 194 of 1993;

5.10 Unemployment Insurance Act 30 of 1966;

5.11 Unemployment Insurance Contributions Act 4 of 2002; and

5.12 Value-Added Tax Act 89 of 1991.

6 CATEGORIES OF RECORDS HELD BY THE COMPANY

The Company's web page which is accessible to anyone who has access to the Internet, contains information relating to the business operations of the Company.

- 6.1 Other records held by the Company include -
- 6.1.1 statutory company information;
 - 6.1.2 financial records;
 - 6.1.3 records required by law to verify identity of clients;
 - 6.1.4 records relating to fixed and movable property;
 - 6.1.5 records relating to intellectual property;
 - 6.1.6 commercial contracts;
 - 6.1.7 employee records;
 - 6.1.8 insurance contracts;
 - 6.1.9 debt collection records;
 - 6.1.10 records relating to prospective investments; and
 - 6.1.11 records and information required for the exercise or protection of any rights will be made available subject to the provisions of the Act.
- 6.2 Access to records may be refused on grounds specified in the Act.

7 PROCESSING OF PERSONAL INFORMATION

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

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

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

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

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

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

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

7.3.3 email access requires 2-factor authentication;

7.3.4 external access to the server is locked down;

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

7.3.6 antivirus software is updated regularly;

7.3.7 remote monitoring of access activity; and

7.3.8 employees are under an obligation to keep information confidential.

8 FORM OF REQUEST

- 8.1 The requester must use the prescribed form to make the request for access to a record. Request forms can be obtained on the Information Regulator's website at <https://info regulator.org.za/paia-forms/>.
- 8.2 The request must be made to the contact person at the address, fax number or electronic mail address given in paragraph 1 of this manual.

9 PRESCRIBED FEES

- 9.1 A requester who seeks access to a record containing personal information about that requester is not required to pay the request fee.
- 9.2 Every other requester must pay the required request fee. The fee structure can be obtained on the Information Regulator's website at <https://info regulator.org.za/wp-content/uploads/2020/07/Form-3-PAIA.pdf>.

10 AVAILABILITY OF THE MANUAL

- 10.1 This manual is available for inspection at the offices of the Company at no cost during normal business hours.
- 10.2 This manual is available on the website of the Company.
- 10.3 Copies of this manual may be obtained, subject to the prescribed fees, from the offices of the Company.