BAMROFEM HOMES (PTY) LTD

Registration Number 2025/103418/07

PAIA MANUAL

Prepared in terms of Section 51 of the
Promotion of Access to Information Act 2 of 2000 (PAIA)
read together with the
Protection of Personal Information Act 4 of 2013 (POPIA)

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Table of Contents

1. Introduction 4
2. Purpose of this Manual 4
3. Legislative Framework 4
4. Definitions and Abbreviations 5
5. About BAMROFEM HOMES 6
6. Information Officer 7
7. Guide on How to Use PAIA 7
8. Records Automatically Available 8
9. Records Available in Terms of Other Legislation 8
10. Categories of Records Held by BAMROFEM HOMES 9
11. Procedure for Requesting Access to Records 12
12. Processing of Personal Information 12
13. Categories of Data Subjects 13
14. Categories of Personal Information Processed 13
15. Purpose of Processing Personal Information 14
16. Categories of Recipients of Personal Information 15
17. Cross-Border Transfers of Personal Information 16
18. Information Security Measures 16
19. Grounds for Refusal of Access 17
20. Remedies Available to Requesters 17
21. Availability of this Manual 17
22. Updating and Review of this Manual 18
23. Approval and Signature 18

1. Introduction

BAMROFEM HOMES (PTY) LTD, registration number **2025/103418/07**, trading as **Bamrofem Homes** ("the Company", "we", "us" or "our"), is a private company incorporated and registered in the Republic of South Africa. The Company is a "private body" as that term is used in the Promotion of Access to Information Act 2 of 2000 ("PAIA").

This Manual has been prepared and is published in accordance with **section 51 of PAIA**, which requires the head of a private body to compile a manual explaining how a member of the public may exercise their right of access to records held by that body, subject to the grounds of refusal and procedures set out in PAIA.

This Manual should be read together with the **Protection of Personal Information Act 4 of 2013 ("POPIA")**, which governs how the Company collects, uses, stores, shares and otherwise processes personal information. While PAIA and POPIA are separate pieces of legislation that serve different purposes, both are administered by the Information Regulator and are addressed together in this Manual for the convenience of the reader.

PAIA gives effect to the constitutional right of access to information and establishes a framework that allows any person to request access to records held by public and private bodies in South Africa, subject to the requirements, exclusions and grounds of refusal set out in the Act. Access under PAIA is not automatic or unconditional — it is a structured legal process.

> *This Manual is written in plain, accessible language wherever possible. Where a legal term has a specific meaning under PAIA or POPIA, that meaning is used and, where useful, explained in Section 4 (Definitions and Abbreviations).*

2. Purpose of this Manual

This Manual is published to:

- facilitate access, where legally permitted, to records held by the Company;
- explain how a request for access to a record may be submitted to the Company;
- identify the categories of records held by the Company;
- identify categories of information that may already be automatically or publicly available, without the need for a formal PAIA request;
- explain, at a general level, how the Company processes personal information in terms of POPIA;
- provide the contact details of the Company's Information Officer;
- explain the remedies available to a requester whose request is refused, or who believes their information rights have been infringed; and
- support transparency and accountability in the Company's dealings with members of the public, clients and other stakeholders.

3. Legislative Framework

The Company's information-related obligations, and the manner in which this Manual has been prepared, are informed by the South African legislation set out in the table below. Reference to a piece of legislation does not necessarily mean that every provision of that legislation applies to every aspect of the Company's business — in each case, the legislation applies to the extent applicable to the Company's activities.

Legislation	Relevance to the Company
Promotion of Access to Information Act 2 of 2000 (PAIA)	Primary legislation under which this Manual is compiled; governs access to records held by the Company.
Protection of Personal Information Act 4 of 2013 (POPIA)	Governs the lawful processing of personal information by the Company as a responsible party.
Companies Act 71 of 2008	Applicable to the Company's incorporation, governance, and statutory corporate records.
Income Tax Act 58 of 1962	Applicable to the Company's tax affairs and related records.
Value-Added Tax Act 89 of 1991	Applicable to the extent the Company is a registered VAT vendor and to related records.
Basic Conditions of Employment Act 75 of 1997	Applicable to the extent the Company employs staff.
Labour Relations Act 66 of 1995	Applicable to the extent the Company employs staff and to workplace relations.
Employment Equity Act 55 of 1998	Applicable to the extent the Company employs staff and where the Act's thresholds and requirements apply.
Consumer Protection Act 68 of 2008	Applicable where the Company supplies goods or services to consumers, to the extent the Act applies to those transactions.
Electronic Communications and Transactions Act 25 of 2002	Applicable to the Company's electronic communications, website and online transactions, where relevant.
Property Practitioners Act 22 of 2019	Applicable where, and to the extent that, the Company's activities fall within the scope of regulated property practice under the Act.

This table is provided for general orientation only. It does not constitute a complete or exhaustive statement of the law, and it should not be relied upon as legal advice.

4. Definitions and Abbreviations

For ease of reference, the terms below are used in this Manual with the meanings set out in the table. Where a term is defined in PAIA or POPIA, that statutory meaning applies; the descriptions below are a plain-language summary and not a substitute for the statutory definitions.

Term	Meaning
Company	BAMROFEM HOMES (PTY) LTD, registration number 2025/103418/07, trading as Bamrofem Homes.
PAIA	The Promotion of Access to Information Act 2 of 2000, as amended.
POPIA	The Protection of Personal Information Act 4 of 2013, as amended.

Term	Meaning
Information Officer	The person who, in relation to a private body, performs the functions assigned in terms of PAIA and POPIA. For the Company, this is the Head of the Private Body identified in Section 6 of this Manual.
Deputy Information Officer	A person formally designated to assist the Information Officer in the performance of their duties. No Deputy Information Officer has been designated by the Company as at the date of this Manual.
Personal Information	Information relating to an identifiable, living natural person and, where applicable, an identifiable, existing juristic person, as defined in POPIA.
Record	Any recorded information, regardless of form or medium, in the possession or under the control of the Company, as contemplated in PAIA.
Requester	A person who requests access to a record of the Company in terms of PAIA.
Information Regulator	The Information Regulator of South Africa, established in terms of POPIA, responsible for the regulation and oversight of both PAIA and POPIA.
Private Body	A body as defined in section 1 of PAIA, which includes a company such as the Company.

5. About BAMROFEM HOMES

BAMROFEM HOMES (PTY) LTD is a South African property-focused business and digital property platform. The Company's activities may include:

- property listings;
- property advertising;
- property marketing;
- connecting property owners with prospective buyers;
- connecting landlords with prospective tenants;
- responding to and managing property enquiries;
- provision of property-related information;
- property news and educational content;
- digital property services offered through the Company's website and related channels;
- client communication; and
- property-related administrative services.

> *Where any of the Company's activities fall within the scope of "property practice" as regulated under the Property Practitioners Act 22 of 2019, the Company's activities are conducted, or intended to be conducted, in a manner consistent with that Act to the extent it applies. This Manual does not represent that the Company holds any specific registration, licence, fidelity fund certificate or authorisation, unless separately confirmed by the Company in writing.*

Further company details are set out below. Any field marked **[NOT PROVIDED]** reflects information that has not been supplied for inclusion in this Manual and will be updated once available.

Detail	Information
Registered Name	BAMROFEM HOMES (PTY) LTD
Trading Name	Bamrofem Homes
Registration Number	2025/103418/07
Principal / Physical Address	72 Simonsvlei Crescent, The Reeds, Centurion, Gauteng, South Africa, 0157
Postal Address	[NOT PROVIDED]
Telephone Number	[NOT PROVIDED]
Website	https://bamrofemhomes.com
PAIA / Information Officer Email	paia@bamrofemhomes.com

6. Information Officer

The Information Officer (also referred to as the Head of the Private Body) is responsible for the Company's compliance with PAIA and POPIA, including receiving and processing requests for access to records, and dealing with matters relating to the processing of personal information.

Detail	Information
Name	Femi Victor Bamisaye
Designation	Director
Role	Information Officer / Head of Private Body
Company	BAMROFEM HOMES (PTY) LTD
Email	paia@bamrofemhomes.com
Address	72 Simonsvlei Crescent, The Reeds, Centurion, Gauteng, South Africa, 0157

Deputy Information Officer

No Deputy Information Officer details have been designated in this Manual.

> *Registration of the Information Officer with the Information Regulator is a separate statutory compliance step under POPIA. Publication of this Manual does not, on its own, constitute or replace that registration.*

7. Guide on How to Use PAIA

The Information Regulator has published a general guide, as contemplated in section 10 of PAIA, to assist members of the public in understanding and exercising their rights under PAIA and POPIA. That guide, and other official resources, are available from the Information Regulator's website: www.justice.gov.za/inforeg.

A requester wishing to request access to a record held by the Company should use the current prescribed form applicable to requests made to a private body, as published from time to time by the Information

Regulator. This Manual does not reproduce that form; the requester should obtain the current version directly from the Information Regulator.

To enable the Company to process a request efficiently, the requester should provide sufficient information to identify, at least:

- the record being requested, described with reasonable particularity;
- the requester (including proof of identity where required);
- the right that the requester seeks to exercise or protect, where the requester is required to establish such a right;
- the requester's preferred form of access to the record;
- the requester's contact and postal or email address; and
- any other information reasonably necessary to enable the Company to process the request.

8. Records Automatically Available

The following categories of information are generally made available by the Company to the public, without the need to submit a formal PAIA request, typically through the Company's website:

- General information about Bamrofem Homes and its services
- Public property listings displayed on the Company's website
- Property marketing and promotional information
- Public contact information published by the Company
- Blog posts and property-related articles
- General property advice and educational content
- Property news content published by the Company
- The Company's Terms and Conditions
- The Company's Privacy Policy
- The Company's Cookie Policy
- This PAIA Manual
- Other public marketing material published by the Company

> *Information that is publicly available remains subject to accuracy, privacy, confidentiality and third-party rights, and may be amended, updated or removed by the Company from time to time. Availability of a category of information on the website does not create a right to any other record relating to that subject matter.*

9. Records Available in Terms of Other Legislation

Certain records held by the Company may also be available, or subject to disclosure obligations, under legislation other than PAIA. This does not mean that such records are automatically available to members of the public generally — in most cases, access remains limited to the specific person or authority entitled to it by law.

Record Category	Applicable Legislation	Availability
Corporate records	Companies Act 71 of 2008	Certain records available to shareholders/regulators as required by law; not generally available to the public on request.
Tax records	Income Tax Act 58 of 1962	Confidential; available to SARS and the Company as required by law; not available to the public.
VAT records, where applicable	Value-Added Tax Act 89 of 1991	Confidential; available to SARS and the Company as required by law; not available to the public.
Employment records, where applicable	Employment legislation (BCEA, LRA, EEA)	Available to the relevant employee and regulators as required by law; not available to the public.
Personal information records	POPIA	Available to the relevant data subject on request, subject to POPIA; not generally available to third parties.
PAIA records	PAIA	Available to requesters through the formal PAIA request procedure set out in this Manual.
Property practitioner records, where applicable	Property Practitioners Act 22 of 2019	Available to relevant parties and regulators as required by that Act, to the extent applicable.
Electronic records	Electronic Communications and Transactions Act 25 of 2002	Governed by ECTA principles regarding electronic records and communications, where applicable.
Consumer records	Consumer Protection Act 68 of 2008	Available to the relevant consumer as required by law, where the Act applies to the transaction.

10. Categories of Records Held by BAMROFEM HOMES

This section sets out, by category, the general types of records that the Company may hold in the ordinary course of its business. Not every category will apply at all times, and the existence of a category below does not confirm that a specific record exists or that it will be accessible to a particular requester.

10.1 Corporate Records

- CIPC and other company registration records
- Memorandum of Incorporation
- Director records
- Shareholder records
- Governance records
- Resolutions
- Internal policies
- Internal procedures
- Meeting records
- Strategic and planning documents

10.2 Property Records

- Property listings
- Property descriptions
- Property photographs
- Property videos
- Property specifications
- Property location information
- Ownership information supplied to the Company
- Listing agreements
- Mandates, where applicable
- Property enquiries
- Viewing records
- Property-related correspondence
- Marketing materials relating to specific properties

10.3 Client Records

- Records relating to property owners
- Records relating to sellers
- Records relating to buyers
- Records relating to landlords
- Records relating to tenants
- Records relating to prospective buyers
- Records relating to prospective tenants
- Records relating to investors
- Records relating to other clients

10.4 Financial Records

- Invoices
- Receipts
- Accounting records
- Payment records
- Bank-related records
- Tax records
- Financial statements
- Expense records
- Supplier records
- Debtor records

- Creditor records

10.5 Contracts

- Client agreements
- Service agreements
- Supplier agreements
- Contractor agreements
- Employment agreements
- Confidentiality agreements
- Partnership agreements
- Other commercial agreements

10.6 Human Resources (where applicable)

- Curricula vitae
- Job applications
- Employment contracts
- Payroll records
- Leave records
- Performance records
- Training records
- Disciplinary records
- Employee correspondence

10.7 Marketing

- Advertising campaign records
- General marketing records
- Customer communications
- Website analytics
- Social media records
- Mailing lists
- Marketing consent records
- Promotional material

10.8 Technology and Website Records

- Website records
- User account records
- Website enquiries
- System logs

- Security logs
- Technical records
- Cookie data
- Website analytics data
- User accounts
- Backups
- Access logs
- Website administration records

11. Procedure for Requesting Access to Records

A person wishing to request access to a record held by the Company should follow the process below:

- 1. Identify the record being requested, with as much particularity as possible.
- 2. Submit the request in writing to the Information Officer at paia@bamrofemhomes.com, using the current prescribed form applicable to private bodies, obtained from the Information Regulator.
- 3. Provide sufficient identifying information and the details set out in Section 7 of this Manual.
- 4. The Company will acknowledge and process the request.
- 5. The Information Officer will assess the request against the provisions of PAIA.
- 6. The Company will determine whether access can lawfully be granted, granted in part, or must be refused.
- 7. Where any fees are legally permitted and applicable, these will be communicated to the requester in accordance with PAIA.
- 8. Access will be provided, or refused, in accordance with PAIA.
- 9. Where required by PAIA, reasons for any refusal will be provided to the requester.
- 10. Where a requester is dissatisfied with the outcome, the remedies described in Section 20 of this Manual may be available.

> *PAIA prescribes statutory time periods and procedures applicable to requests made to private bodies. The Company will follow the applicable statutory time periods in force at the time a request is received, as set out in PAIA and its regulations, rather than any timeframe stated informally elsewhere. Requesters are encouraged to consult the Information Regulator's published guidance and prescribed forms for the most current requirements.*

12. Processing of Personal Information

The Company processes personal information in the ordinary course of its business, in accordance with POPIA. “Processing” includes collecting, receiving, recording, storing, using, disseminating and destroying personal information.

Personal information may be collected through channels including:

- website forms
- property enquiries

- account registrations
- email correspondence
- telephone communication
- WhatsApp or similar messaging channels
- property listings submitted to the Company
- contracts entered into with the Company
- applications submitted to the Company
- marketing interactions
- customer support interactions
- transactions concluded with or through the Company

> *This section provides a general overview only. Further detail regarding the Company's processing of personal information, including data subject rights, may be set out in the Company's separate Privacy Policy, available on the Company's website.*

13. Categories of Data Subjects

The Company may process personal information relating to the following categories of data subjects, depending on the nature of the interaction:

- Property owners
- Buyers
- Prospective buyers
- Sellers
- Landlords
- Tenants
- Prospective tenants
- Investors
- Website users
- Subscribers
- Employees
- Job applicants
- Contractors
- Consultants
- Suppliers
- Service providers
- Business partners
- Visitors

14. Categories of Personal Information Processed

The categories of personal information processed by the Company depend on the nature of the relevant interaction and may include the following.

14.1 Identification Information

- Name
- Surname
- Identity or passport details, where lawfully required
- Company registration information, where applicable

14.2 Contact Information

- Email address
- Telephone number
- Physical address
- Postal address

14.3 Property Information

- Property address
- Property preferences
- Ownership information
- Rental requirements
- Buying requirements
- Listing information

14.4 Financial Information (where lawfully required)

- Banking information
- Payment information
- Financial qualification information
- Transaction information

14.5 Employment Information (where applicable)

- Employer
- Position
- Employment status
- Income information

14.6 Technical Information

- IP address
- Browser type

- Device information
- Website usage data
- Cookies
- Access logs

> *The Company seeks to limit the collection of personal information to what is reasonably necessary for the specific, lawful purpose for which it is collected, in accordance with POPIA's data minimisation principle.*

15. Purpose of Processing Personal Information

The Company processes personal information for purposes that may include:

- Providing property services
- Responding to enquiries
- Connecting relevant parties (for example, buyers and sellers, or landlords and tenants)
- Property marketing
- Property listing management
- Facilitating and administering transactions
- Verification of information provided
- Client relationship management
- Processing payments
- Compliance with legal obligations
- Maintaining business records
- Fraud prevention
- Website improvement
- Customer support
- Marketing, where lawful
- Recruitment
- Information security
- Dispute resolution
- Other legitimate business purposes, where permitted by law

16. Categories of Recipients of Personal Information

Depending on the nature of the interaction, personal information may be disclosed by the Company to categories of recipients that may include:

- Property owners
- Buyers
- Sellers
- Landlords

- Tenants
- Estate agents / property practitioners, where applicable
- Conveyancing attorneys
- Banks and other financial institutions
- Payment processors
- Hosting providers
- Email service providers
- Technology service providers
- Professional advisers
- Accountants
- Auditors
- Insurers
- Government authorities
- Regulators
- Law enforcement, where legally required
- Contractors
- Marketing service providers
- Other authorised service providers

> *Disclosure of personal information is limited to what is lawful and reasonably necessary in the circumstances, in accordance with POPIA.*

17. Cross-Border Transfers of Personal Information

The Company may make use of third-party cloud, hosting, email, analytics and other technology service providers whose infrastructure or operations may result in personal information being processed outside the borders of South Africa.

Where personal information is transferred outside South Africa, the Company will seek to comply with the requirements of POPIA relating to cross-border transfers of personal information, including, where applicable, satisfying itself that the recipient is subject to a law, binding corporate rules, contractual or other arrangement that provides an adequate level of protection for the information.

> *Specific countries or jurisdictions to which personal information may be transferred are not listed in this Manual and will depend on the service providers engaged by the Company from time to time.*

18. Information Security Measures

The Company seeks to implement appropriate technical and organisational measures to protect personal information and other records against loss, damage, unauthorised access, or unlawful processing, in accordance with POPIA's security safeguard requirements. These measures may include:

- Access controls

- Authentication measures
- Password protection
- Role-based access
- SSL/TLS encryption for data in transit
- Secure hosting arrangements
- Regular backups
- Malware protection
- Firewall protection
- Security monitoring
- Regular software updates
- Restricted administrative access
- Confidentiality obligations imposed on personnel
- Staff awareness of information security practices
- Incident response procedures
- Controls over third-party vendors
- Secure deletion of records where appropriate

> *This section describes general categories of safeguards. It does not claim any specific security certification, accreditation or technical system that has not been independently verified.*

19. Grounds for Refusal of Access

PAIA does not create an unqualified right of access to every record held by a private body. Access to a requested record may be refused, in whole or in part, on grounds recognised in PAIA, which may include:

- Protection of the personal information of a third party
- Protection of certain records of a third party (including commercial information)
- Commercial confidentiality
- Trade secrets
- Confidential information supplied by a third party
- Legal professional privilege
- Protection of the safety of individuals and property
- Protection of the Company's legitimate commercial interests
- Records relating to legal proceedings
- Other grounds recognised under PAIA

> *Any refusal of access by the Company will be based on the applicable provisions of PAIA, and reasons will be provided to the requester as required by the Act.*

20. Remedies Available to Requesters

Where access to a record is refused, or a requester believes that their rights under PAIA or POPIA have been infringed, the following remedies may be available:

- contacting the Company's Information Officer to seek clarification or resolution;
- lodging a complaint with the Information Regulator;
- seeking independent legal advice;
- seeking appropriate relief through the courts, where applicable; and
- exercising the applicable rights afforded to data subjects under POPIA.

Requesters are referred to the official website of the Information Regulator of South Africa for current complaint procedures, prescribed forms and further guidance: www.justice.gov.za/inforeg.

21. Availability of this Manual

This Manual will be made available:

- on the Company's website, at https://bamrofemhomes.com/paia-manual/
- at the Company's principal place of business: 72 Simonsvlei Crescent, The Reeds, Centurion, Gauteng, South Africa, 0157; and
- upon request, by contacting the Information Officer at paia@bamrofemhomes.com.

22. Updating and Review of this Manual

Field	Detail
Version	1.0
Date of Compilation	24 August 2026
Next Review	24 August 2027

The Company will review this Manual at least annually, and additionally whenever:

- applicable legislation changes;
- the Company's business activities change;
- the categories of records held by the Company change;
- the Company's personal information processing practices change;
- the Information Officer's details change;
- the Company's technology infrastructure materially changes; or
- applicable regulatory requirements change.

23. Approval and Signature

This PAIA Manual has been approved for publication on behalf of BAMROFEM HOMES (PTY) LTD.

BAMROFEM HOMES (PTY) LTD

Approved by:

Femi Victor Bamisaye

Director

Information Officer / Head of Private Body

Signature: Femi Victor

Date: 24-07-2026

> *Disclaimer: This Manual is intended to provide information concerning BAMROFEM HOMES (PTY) LTD's PAIA and POPIA-related processes. It should not be interpreted as legal advice or as a representation that the Company has satisfied every obligation under South African law. The Company may obtain professional legal advice where appropriate, and this Manual will be updated as required by changes in legislation, regulatory guidance, business activities or information-processing practices.*