



**NISHAL BHAYROO INVESTMENTS
PROPRIETARY LIMITED**

Registration Number: 2021/119630/07

PROMOTION OF ACCESS TO INFORMATION MANUAL

We respect your right of access to information and would like to reassure you that we take our commitment to both protecting your information as well as providing you with access to it very seriously. This document will help you exercise that right as required by section 51 of the Promotion to Access of Information Act 2 of 2000 (PAIA). This will serve as a guide to helping you understand what information we possess and how you may access same.

Callouts like this are a summary of our manual and contain the most important and relevant points for you. They are here to help you understand it but should not be solely relied upon, we kindly encourage you to read the manual in full.

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Introduction

We are Nishal Bhayroo Investments Proprietary Limited, and this is our 'Access to Information Manual'. Its purpose is to help you access our information and any other information that we have. PAIA requires us to make this Manual available to you so that you:

- understand what types of information we have; and
- can request access to it.

This manual will aid in ensuring that information requests are processed in accordance with the our policies, structures, and legal obligations under the Promotion of Access to Information Act 2 of 2000.

This manual exists to tell you what information we have and help you get access to it.

Our Company's Details

Our details are as follows:

Nishal Bhayroo Investments Proprietary Limited	
Registration Number:	2021/119630/07
Trading as:	NBi Props
Date of Incorporation:	28 November 2021
Registered Address:	60 10 th Street Linden, Johannesburg, 2195
Postal Address:	60 10 th Street Linden, Johannesburg, 2195
Telephone:	083 391 5173
Email:	info@nbiprops.co.za
Director:	Nishal Bhayroo

We have appointed the following information officer for Nishal Bhayroo Investments Proprietary Limited -

Information Officer	Dhanir Bhayroo
Contact person:	Dhanir Bhayroo
Business Address	60 10 th Street Linden, Johannesburg, South Africa, 2195
Postal	60 10 th Street Linden, Johannesburg, 2195
Contact details	Cell: +2764 511 4745 Email: dhanir@bhayrooattorneys.co.za

These are all our details, but please rather contact us by email at either of the following emails whenever possible.

dhanir@bhayrooattorneys.co.za

or

info@bhayrooattorneys.co.za

Further Guidance

Requesters are referred to the 'Guide' compiled by the Information Regulator, which is available in a range of official languages and contains information to aid you in exercising your constitutionally enshrined rights. Please contact the Information Regulator or visit their website for more information on how you can get access to information under PAIA, and to access the Guide.

The contact details of the Information Regulator are:

- **Postal address:** P.O Box 3153, Braamfontein, Johannesburg, 2017
- **Physical address:** JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001
- **Phone number:** 010 023 5200
- **Website:** www.inforegulator.org.za
- General e-mail: enquiries@inforegulator.org.za
- PAIA Complaints email: PAIAComplaints@inforegulator.org.za
- POPIA Complaints email: POPIAComplaints@inforegulator.org.za

For further guidance on how you can get access to information or Information regulator's E-Services portal, please visit: <https://www.inforegulator.org.za>.

Records We Hold

We hold the following subjects and categories of records:

- **Company Records;**
- **Business Records;**
- **Financial Records;**
- **Insurance Records;**
- **Income Tax Records;**
- **Personnel Records;**
- **Policies and Directives;**
- **Agreements or Contracts;**
- **Regulatory Documents;**
- **Published Information;** and
- **Client Information.**

Please note that a number of these records are 'not automatically available,' they must be requested using the process outlined in the 'How to request access' section of this manual.

We hold various subjects and categories of records in electronic or physical form that are sometimes available automatically or may take some time to obtain depending upon the document.

Company Records

Company records are all the records related to the incorporation and administration of our Company (NBI Props). Some of them are available from the Companies and Intellectual Property Commission (CIPC), others we may have to obtain from various sources.

Memorandum of Incorporation

Automatically available
from CIPC

Directors' names

Automatically available
from CIPC

Other Documents of Incorporation/CIPC documents	Automatically available from CIPC
Written Director Resolutions	Not automatically available
Records relating to appointment of Members, Accountants and Auditors.	Not automatically available
Share Register	Not automatically available

Company records include our CIPC information and Director Information.

Business Records

Business records include documents that have economic value to the business.

Client Databases	Not automatically available
Agent Databases	Not automatically available
Service Provider Databases	Not automatically available

Financial Records

Financial records are all our records related to our finances.

Financial Statements	Not automatically available (NDA required)
Tax Returns	Not automatically available
Other documents relating to Taxation of the Company	Not automatically available
Accounting Records	Not automatically available (NDA required)
Auditor Reports	Not automatically available
Banking Details	Automatically available on request
Bank Statements	Not automatically available (NDA required)
Invoices	Not automatically available

Financial records include our financial statements and banking details amongst other things, however, some of this information may necessitate the signature of a Non-Disclosure Agreement.

Insurance Records

Insurance records are all our records related to our entities insurances.

Insurance policies held by the Company	Not automatically available
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Income Tax Records

Income tax records are all our records related to our income tax obligations.

Corporate Tax Records	Not automatically available
VAT records	Not automatically available

Personnel Records

Personnel records are all our records about anyone who works for us, provides services to us, or provides services on our behalf and who receives or is entitled to receive remuneration, including our employees, contractors, and other personnel.

List of Contractors	Not automatically available
Contractor Personal Information	Not automatically available
Employee/Contractor Employment/Independent Contactor Contracts	Not automatically available
Contractor Procedures and Practices	Not automatically available
Code of Conduct for Contractors	Not automatically available
Remuneration Records to Contractors	Not automatically available

Personnel records include records about our employees and contractors.

Policies and Directives

Policies and Directives include both internal and external documents.

Internal relating to Contractors	Not automatically available
External relating to Clients and Other Third Parties	Not automatically available

Agreements or Contracts

Agreements or contracts include the documents themselves and all related documents.

Contracts concluded with clients (mandates)	Not automatically available
Supplier or service contracts	Not automatically available

Regulatory Documents

Regulatory documents include any documents required to comply with any laws.

FFC Certificates	Not automatically available
Contractor FFC Certificates	Not automatically available

Published Information

Published information includes any document that we prepare and produce.

Mandates, Offer to Purchases and Disclosure Forms	Automatically available on request
Information Available on the Website	Automatically available
Information on the Company published by third parties	Not automatically available

Client Information

Client information includes any information about anyone that we provide services to, including our customers.

Client Mandates, Offers to Purchaser and Disclosures Forms	Not automatically available
Client FICA Information (ID's, Entity Registration/CIPC and Trust Documentation).	Not automatically available
Correspondence with Clients and Client Contact Details	Not automatically available

Information we hold to comply with the Applicable Pieces of Legislation:

We hold records for the purposes of PAIA in terms of the following main laws, among others:

- Basic Conditions of Employment Act 75 of 1997;
- Broad Based Black Economic Empowerment Act 53 of 2003;
- Companies Act 61 of 1973;
- Companies Act 71 of 2008;
- Compensation for Occupational Injuries and Disease Act 130 of 1993;
- Competition Act 89 of 1998;
- Consumer Protection Act 68 of 2008;
- Copyright Act 98 of 1978;
- 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;
- Income Tax Act 58 of 1962;
- Intellectual Property Laws Amendment Act, No 38 of 1997;
- Intellectual Property Laws Amendment Act, No 28 of 2013;
- Labour Relations Act 66 of 1995;
- National Credit Act 34 of 2005;
- Occupational Health and Safety Act 85 of 1993;
- Prescription Act 18 of 1943;
- Prevention & Combating of Corrupt Activities Act 12 of 2004;
- Prevention of Constitutional Democracy Against Terrorist & Related Activities Act 33 of 2004;
- Prevention of Organised Crime Act 121 of 1998;
- Promotion of Equality and Prevention of Unfair Discrimination Act 4 of 2000;
- Protected Disclosures Act 26 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;
- Tax Administration Act 28 of 2011;
- Unemployment Contributions Act 4 of 2002;
- Unemployment Insurance Act 63 of 2001;
- Unemployment Insurance Contributions Act 4 of 2002; and
- Value Added Tax Act 89 of 1991.

How to Request Access to Information

We have authorised and designated our Information Officer to deal with all matters relating to PAIA in order to comply with our obligations in terms of the Promotion of Access to Information Act 2 of 2000. To request access to a record of Nishal Bhayroo Investments Proprietary Limited, a private company, please complete Form 2 which is available from

- The Information Regulator website at <https://info regulator.org.za/wp-content/uploads/2020/07/InfoReqSA-PAIA-Form02-Req7.pdf>

Please submit the completed form together with the relevant request fee (details here: <https://info regulator.org.za/wp-content/uploads/2020/07/Form-3-PAIA.pdf>) to our Information Officer's email address or our physical address in terms of our details provided above. Please ensure that the completed form:

- has enough information for the information officer to identify you, the requested records, and which form of access you require;
- specifies your email address and/or postal address,;
- describes the right that you seek to exercise or protect;
- explains why you need the requested record to exercise or protect that right;
- provides any other way you would like to be informed of our decision other than in writing; and
- provides proof of the capacity in which you are making the request if you are making it on behalf of someone else (we will decide whether this proof is satisfactory).

If you do not use the standard form we may:

- reject the request due to lack of procedural compliance;
- refuse it, if you do not provide sufficient information; or
- delay it.

You may request information by completing a request for access form and submitting it to our information Officer together with a request fee.

Grounds for Refusal of a Request

We may have to refuse you access to certain records in terms of PAIA to protect:

- someone else's privacy;
- another company's commercial information;
- someone else's confidential information;
- the safety of individuals and property;
- records privileged from production in legal proceedings; or
- research information.

We will notify you in writing whether your request has been approved or denied within 30 calendar days after we have received a completed request for access form. If we cannot find any requested record or it does not exist, then we will notify you by way of affidavit that it is not possible to give access to that particular record.

We may have to refuse you access to a record to protect others.

How we will give you Access

We will evaluate and consider all requests made to us in terms of PAIA. If we approve your request for access to our records, then we will decide how to provide access to you – unless you have asked for access

in a specific form. Publication of this manual does not give rise to any rights to access information records, except in terms of PAIA.

How Much it will Cost You

You must pay us a request fee as required by law when submitting a request for access to information. Please refer to '**Form 03: Outcome of request and of fees payable [Regulation 8]**' which is available on the website of the Information Regulator at www.inforegulator.org.za under the section 'PAIA /Forms'. You must pay us the fees before we will hand over any information. You may have to pay a further access fee if we grant the request for any time that has exceeded the prescribed hours to search and prepare the record for disclosure.

How we Process and Protect Personal Information

We process the personal information of various categories of people for various purposes as set out in our privacy policy, and this clause hereunder.

Categories of People

We process the personal information of the following categories of people:

- Clients;
- Contractors, Vendors, or Suppliers;
- Directors and Shareholders.

Purposes

We process the personal information to:

- Supply our Services;
- Better understand our data subjects' needs in order to supply our Services;
- Supply Client Information to Third Parties to enable us to perform our Services after having obtained our Clients consent to do so.
- Process Customer Requests or Complaints; and
- Tailor our Services to our Clients.

Categories of Personal Information

We process many different categories of personal information, including:

- Contact Details, such as Phone Numbers, Physical and Postal Addresses, and Email Addresses;
- Personal Details, such as Names, Registered Names and Entity Registration Numbers;
- Source Documents such as Identity Documents, Proofs of Address, Bank Statements, Entity Registration Documentation, Trust Deeds, Company Financials;
- Account Numbers and Account Confirmation Letters;
- Client correspondence regarding property needs.

Third-Party Disclosures

We supply the following parties Personal Information (with their Requisite Consent first having been obtained) that we Process in the Ordinary Course of Business to Fulfil our Obligations to our clients:

- Contractors, Vendors, and/or Suppliers;
- External Service Providers;
- Third Party Vendors (such as software developers and service providers) to help us maintain and or provide our services.

Security

We secure data by maintaining reasonable measures to protect personal information from loss, misuse, and unauthorized access, disclosure, alteration and destruction. We also take reasonable steps to keep personal information accurate, current, complete, confidential and reliable for its intended use.

We do our best to keep all data in our possession secure and up-to-date.

Data Subject Requests

A Data Subject has the Right to:

- Request confirmation regarding what personal information the Company holds about them and the purpose for which it is being processed.
- Be informed of how their Personal Information is being processed, kept, stored and eventually destroyed.

We give effect to data subjects rights.

Remedies

If your Request for Access is Denied, you may:

- apply to a court with appropriate jurisdiction, or
- lodge a complaint with the Information Regulator,

for the necessary relief.

Availability of this Manual

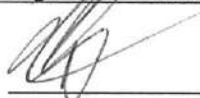
This Manual is available in English and will be available on our website, and at our offices. The manual is also electronically available on our website at: www.nbiprops.co.za.

Updates to this Manual

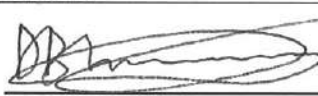
This Manual will be updated whenever we make Material Changes to the current processes, however, we do reserve the right to update it as and when we deem fit.

This Manual has been reviewed by the Director of the Company and the Appointed Information Officer and has been accepted.

Signed at JOHANNESBURG on this 26th day of JUNE 2025.



Nishal Bhayroo
Director and Owner
Nishal Bhayroo Investments Proprietary Limited



Dhanir Bhayroo
Information Officer
Nishal Bhayroo Investments Proprietary Limited