PAIA MANUAL

PREPARED IN TERMS OF SECTION 51 OF THE *PROMOTION OF ACCESS TO INFORMATION ACT 2 OF 2000* (AS AMENDED) AND THE *PROTECTION OF PERSONAL INFORMATION ACT 4 OF 2013* (AS AMENDED)

OF

Blok Urban Apartment Living (Pty) Ltd
Registration Number: 2015/426794/07

COMPILED: NOVEMBER 2026

1. INTRODUCTION

At Blok Urban Apartment Living (Pty) Ltd, registration number 2015/426794/07 ("Blok", "we", "us" or "our"), we understand the importance of transparency and the constitutional right of access to information. We will use reasonable efforts to ensure that any person who requires access to a record in order to exercise or protect a right has access to the PAIA Guide prepared by the Regulator and assistance from us with the request process.

Blok takes reasonable steps to protect the records it holds against unlawful access and to process personal information in accordance with applicable South African law. We have prepared this PAIA manual in accordance with section 51 of PAIA to assist persons seeking access to records held by us under PAIA.

2. DEFINITIONS AND INTERPRETATION

In this PAIA Manual, unless the context indicates otherwise, the following words and expressions have the meanings assigned to them, and cognate expressions have corresponding meanings:

2.1. "**DIO**" means the Deputy Information Officer;

2.2. "**IO**" means Information Officer;

2.3. "**PAIA**" means the Promotion of Access to Information Act, 2 of 2000*,* as amended;

2.4. "**POPIA**" means the Protection of Personal Information Act, 4 of 2013, as amended;

2.5. "**Regulator**" means the Information Regulator established in terms of section 39 of POPIA;

2.6. "**Regulations**" means the regulations published in terms of section 92 of PAIA; and

2.7. "**South Africa**" means the Republic of South Africa.

3. PURPOSE OF PAIA MANUAL

The purpose of this PAIA manual is to assist anyone to:

3.1. review the categories of records we hold which are available without having to submit a formal PAIA request;

3.2. understand how to make a request for access to a record of ours, by providing a description of the subjects on which we hold records and the categories of records held under each subject;

3.3. review the types of records which are available in accordance with any other legislation;

3.4. access all the relevant contact details of the Company's IO, who will assist with the records anyone intends to access;

3.5. understand how to access the guide on how to use PAIA, as updated by the Regulator;

3.6. understand whether we will process personal information, the purposes for which we process personal information and the description of the categories of data subjects and of the information or categories of information relating thereto;

3.7. distinguish the categories of data subjects and of the information or categories of information relating thereto;

3.8. identify the third parties to whom personal information may be supplied by us;

3.9. identify if we have planned to transfer or process personal information outside of South Africa and the parties to whom the personal information may be transferred; and

3.10. understand the appropriate security measures we employ to ensure the confidentiality, integrity, and availability of the personal information we process.

4. GUIDE ON HOW TO USE PAIA AND HOW TO OBTAIN ACCESS TO THE GUIDE

4.1. The Regulator has, in terms of section 10(1) of PAIA, updated and made available the revised Guide on how to use PAIA ("**PAIA Guide**"), 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.

4.2. The Regulator has made the PAIA Guide available in each of the official languages of South Africa and in braille.

4.3. The PAIA Guide contains the following:

4.3.1. The objects of PAIA as well as POPIA;

4.3.2. How to access the postal address, telephone number and email address of every registered IO and/or DIO (for both public and private bodies);

4.3.3. The manner and form of request for:

4.3.3.1. access to a record of a public body contemplated in section 11 of PAIA; and

4.3.3.2. access to a record of a private body contemplated in section 50 of PAIA.

4.3.4. the assistance available from the IO of a body in terms of PAIA and POPIA;

4.3.5. the assistance available from the Regulator in terms of PAIA and POPIA;

4.3.6. all remedies in law available regarding an act or failure to act in respect of a right or duty conferred or imposed by PAIA and POPIA, including the manner of lodging –

4.3.6.1. an internal appeal;

4.3.6.2. a complaint to the Regulator; and

4.3.6.3. an application with a court against a decision by the IO of a public body, a decision on internal appeal or a decision by the Regulator or a decision of the head of a private body;

4.3.7. the provisions of sections 14 and 51 of PAIA requiring a public body and private body, respectively, to compile a manual, and how to obtain access to a manual;

4.3.8. the provisions of sections 15 and 52 of PAIA providing for the voluntary disclosure of categories of records by a public body and private body, respectively;

4.3.9. the notices issued in terms of sections 22 and 54 of PAIA regarding fees to be paid in relation to requests for access; and

4.3.10. the Regulations.

4.4. Anyone can inspect or make copies of the PAIA Guide from the office of the Regulator, during normal working hours.

4.5. The PAIA Guide can also be obtained -

4.5.1. upon request to the Company's IO; or

4.5.2. from the website of the Regulator (https://inforegulator.org.za).

4.6. A copy of the PAIA Guide is also available in the following two official languages, for public inspection during normal office hours -

4.6.1. English; and

4.6.2. Afrikaans.

5. CONTACT DETAILS FOR ACCESS TO INFORMATION

5.1. INFORMATION OFFICER

Name: Jacques Eliazer van Embden, Chief Executive Officer

Telephone: +27 66 186 1658

Email: legal@blok.co.za

5.2. DEPUTY INFORMATION OFFICERS:

Name: Nicole Janine Noordien and Lilitha Mia Klaaste

Email: legal@blok.co.za

Information Regulator registration number: 2026-069042

5.3. GENERAL CONTACT:

Email: legal@blok.co.za

5.4. ADDRESS

Physical Address: 82 Main Road, Sea Point, Cape Town, 8005

Postal Address: 82 Main Road, Sea Point, Cape Town, 8005

Telephone: +27 66 186 1658

Website: www.blok.co.za

6. PROCEDURE TO REQUEST ACCESS TO INFORMATION

6.1. A request for access to a record held by the Company must be made on a form that corresponds substantially to Form 2 of the Regulations, together with proof of payment of the prescribed fee, and submitted to the Company's IO at the contact details set out above.

6.2. When completing Form 2 or a form substantially similar, a requester must provide clear and accurate information and clearly state the right which the requestor seeks to exercise or protect, the record which they are seeking to access and an explanation as to how such record will assist them to exercise or protect their rights.

6.3. The Company has 30 (thirty) days within which to respond to any request received. Once a decision has been made, the IO will inform a requester of their decision whether to grant or refuse a request and any fees payable on a form that corresponds substantially to that of Form 3 of the Regulations.

6.4. The Company may refuse a request for access to a record on any of the grounds listed in Chapter 4 of PAIA (which are listed in the PAIA Guide).

6.5. A requestor is required to pay the request fee before a request will be processed. The request fee is listed in Annexure B to the Regulations. The current request fee payable is **R140.00 (one hundred and forty Rand) per request**.

6.6. The request fee must be paid into the Company's nominated bank account, which details are available from our IO on request.

6.7. Blok is the responsible party where it determines the purposes and means of processing, including for enquiries made directly to Blok and its own buyer relationships. A property portal may separately determine how it collects and processes information submitted through its listings. Where Blok processes information on a portal's behalf under the applicable arrangements, it may act as that portal's operator for that processing. If Blok receives a request concerning portal-controlled processing, it will, where appropriate and subject to applicable law, direct the requester to the portal or coordinate with it; Blok will address requests concerning processing for which Blok is the responsible party.

7. REMEDIES

7.1. If a requestor is unhappy with a decision made, they may submit a complaint to the Regulator.

7.2. A complaint to the Regulator must be made on a form which corresponds substantially to that of Form 5 of the Regulations. A complaint to the Regulator must be lodged within 180 (one hundred and eighty) days of receipt of the decision from the Company.

7.3. The complaint will then follow the dispute resolution process described in the Regulations as well as the PAIA Guide.

7.4. A requester may also apply to court for appropriate relief within 180 (one hundred and eighty) days of receipt of the decision from the Company.

8. RECORDS WHICH ARE AVAILABLE WITHOUT REQUEST

The following records are available without a formal PAIA request where Blok has made them publicly available. Confirm the listed website publications before issuing this manual:

Category of records	Types of the Record	Where Available
Company Policies	Privacy Policy	On Website
Company Policies	PAIA Manual	On Website
Company Information	Company profile, development brochures, floor plans and press releases	On Website

9. RECORDS WHICH ARE AVAILABLE IN ACCORDANCE WITH OTHER LEGISLATION

Blok keeps the following records in terms of the legislation listed below. Access to these records is subject to PAIA and the relevant legislation:

Category of Records	Applicable Legislation

PAIA Manual	Promotion of Access to Information Act 2 of 2000
Memorandum of Incorporation	Companies Act 71 of 2008
Privacy Policy	Protection of Personal Information Act 4 of 2013
Securities register, beneficial ownership register, minutes, resolutions and annual returns	Companies Act 71 of 2008
Client due diligence records, transaction records and risk management and compliance programme	Financial Intelligence Centre Act 38 of 2001
Fidelity fund certificates and property practitioner records	Property Practitioners Act 22 of 2019
Accounting records, tax returns and supporting documents	Income Tax Act 58 of 1962 and Tax Administration Act 28 of 2011
VAT returns, invoices and supporting documents	Value-Added Tax Act 89 of 1991
Employment contracts, time records, remuneration and leave records	Basic Conditions of Employment Act 75 of 1997
Disciplinary records, collective agreements and arbitration awards	Labour Relations Act 66 of 1995
Employment equity plans and reports	Employment Equity Act 55 of 1998
Workplace skills plans, training records and levy returns	Skills Development Act 97 of 1998 and Skills Development Levies Act 9 of 1999
UIF registration, declarations and contributions	Unemployment Insurance Act 63 of 2001 and Unemployment Insurance Contributions Act 4 of 2002

COIDA registration, incident and claim records	Compensation for Occupational Injuries and Diseases Act 130 of 1993
Health and safety records and construction site records	Occupational Health and Safety Act 85 of 1993
Sale agreements for land and sectional title units	Alienation of Land Act 68 of 1981
Consumer agreements, disclosures and complaints	Consumer Protection Act 68 of 2008
Home builder registration and home enrolment records	Housing Consumer Protection Measures Act 95 of 1998
Sectional plans, schemes and body corporate records	Sectional Titles Act 95 of 1986 and Sectional Titles Schemes Management Act 8 of 2011
Transfer and title records	Deeds Registries Act 47 of 1937
Building plans and approvals	National Building Regulations and Building Standards Act 103 of 1977
Electronic communications and electronic transaction records	Electronic Communications and Transactions Act 25 of 2002

10. SUBJECTS AND CATEGORIES OF RECORDS HELD

The Company holds records on the following subjects:

Subject of Records	Categories of Records
Company Secretarial	Memorandums of incorporation, resolutions, director registrations, minutes of meetings, shareholder registers, securities and beneficial ownership registers, share certificates and CIPC filings
Finance	Banking/bank account records, quotes and invoices, accounting records, financial statements and reports, invoices
Intellectual Property	Trademarks, copyright, knowhow, and contractual agreements
Tax	Income tax records, contractual agreements, tax dispute records

Human Resources	HR policies and procedures, job applications, employment contracts, personnel files, payroll, leave and benefits records, disciplinary and grievance records, training records and statutory returns
Shareholders and Investors	Share subscription agreements, shareholders agreements, investor and shareholder FICA documents and investor correspondence
Legal and Compliance	Contracts, litigation and dispute records, legal opinions, FICA risk management and compliance programme, Property Practitioners Regulatory Authority records and POPIA and PAIA records, including the request register
Development and Projects	Development agreements, service level agreements, building plans, approvals, zoning records, contractor and professional team agreements, home builder enrolment records and site health and safety records
Information Technology	Software licences; website, CRM and other information-technology systems and technical documentation; lead-management and property-enquiry records; data-protection, retention, security, access-control and audit records; incident-management records; records relating to technology, cloud hosting, communications, marketing, analytics and other service providers; and records relating to cross-border processing and data transfers.
Suppliers, Operators and Vendors	Supplier, service-provider, property-portal and operator contractual, due-diligence, performance and compliance records, including applicable data-processing and retention arrangements.
Property Sales, Buyer Relationships and Website Operations	Property listings, enquiries and lead records, including enquiries received through property portals; prospective-buyer and buyer relationship records; apartment requirements and preferences; property-transaction, identity-verification and FICA-related records; relevant company-registration and financial records; correspondence and support records; marketing-consent, preference and opt-out records; website, advertising and analytics records; and records of disclosures to transaction participants and body corporates where applicable. Portal-originated records may be subject to the relevant portal's terms and processing arrangements.

11. PROCESSING OF PERSONAL INFORMATION

11.1. **Purpose of Processing**

11.1.1. Blok processes personal information as a responsible party where it determines the purposes and means of processing, including for direct enquiries, prospective-buyer and buyer relationships, property transactions, website operations and its own business administration. Property portals may be responsible parties for information collected through their listings; where Blok processes that information on a portal's behalf, Blok may act as its operator under the applicable arrangements. Blok processes information relating to leads, prospective buyers, buyers, apartment owners, investors, shareholders, directors, website visitors, employees, applicants, suppliers, service providers and persons who contact Blok where permitted by POPIA. Further details are set out in Blok's Privacy Policy.

11.1.2. Blok processes personal information in the following circumstances:

11.1.2.1. to receive and respond to property enquiries; assess apartment requirements and preferences; manage leads and prospective-buyer relationships; administer property transactions, including identity verification and FICA-related processes where applicable; and maintain related correspondence and records;

11.1.2.2. to communicate with leads, prospective buyers, buyers, apartment owners, transaction participants and service providers; respond to enquiries and support requests; manage relationships; and send property-enquiry, transaction, service and administrative communications;

11.1.2.3. to administer and protect Blok, its website, CRM and other systems, including troubleshooting, monitoring, website analytics, testing, maintenance, support, reporting and hosting, and to disclose information to authorised recipients where necessary for property transactions, building management or compliance with applicable law;

11.1.2.4. to comply with legal, regulatory, recordkeeping, risk-management, fraud-prevention and compliance obligations, including disclosures to competent government authorities where required or permitted by law;

11.1.2.5. to issue shares and administer relationships with investors and shareholders, including beneficial ownership records;

11.1.2.6. to recruit, employ, pay and manage employees and comply with employment legislation;

11.1.2.7. to appoint and manage contractors, consultants, suppliers and service providers;

11.1.2.8. to comply with reporting and other obligations to the Companies and Intellectual Property Commission, the South African Revenue Service, the Financial Intelligence Centre and the Property Practitioners Regulatory Authority;

11.1.2.9. to use aggregated or irreversibly anonymised information to improve our website, property services, customer relationships and reporting;

11.1.2.10. to use identifiable personal information to operate, maintain and improve our services only where permitted by applicable law and on an appropriate lawful basis;

11.1.2.11. to use technology and service providers for website operations, CRM, communications, cloud storage, analytics and internal administration where permitted by applicable law and subject to appropriate safeguards; and

11.1.2.12. to conduct direct marketing only with the required separate consent or where an applicable POPIA exception permits it, and to record and respect marketing preferences and opt-outs.

11.2. **Data Subjects and Information Processed**

Where Blok acts as a responsible party, it may process the following categories of information about the following data subjects. Information received through property portals may also be processed under the applicable portal arrangements:

Data Subjects	Personal Information that may be processed
Leads, prospective buyers, buyers, apartment owners and website visitors	First and last name, telephone number, email address, residential address, apartment requirements and preferences, enquiry and correspondence records; where relevant to a prospective purchase or transaction, identity number, nationality, country or location, gender, marital status, identity-document copies, FICA documentation and company-registration details; property-transaction records; website technical, usage, cookie and advertising data; and marketing-consent, preference and opt-out records.
Property owners, body-corporate representatives, transaction participants, suppliers and service providers	Company and contact-person information, including names, registration and VAT details, addresses, telephone numbers and email addresses; property, unit, transaction and contractual information; correspondence and support records; and banking, tax or other information where relevant to the relationship or transaction.
Employees / Possible Employees / Partners	Full name, identity documentation, address, contact information, educational qualifications (including curriculum vitae), employment, payroll, banking and tax information, and other information required for recruitment, employment administration and compliance with applicable law, including, where required by law, race, gender and disability information for employment equity reporting, nationality, next of kin details, proof of medical aid or insurance registration and, for applicants, references and criminal record checks where applicable.
Independent Contractors / Sub-Contractors	Company information such as name, registration number, VAT information, registered address, and/or personal information such as full name, address, identity number, contact information, and information obtained from contractual agreements such as confidential information, banking information and/or tax information.

Investors and Shareholders	Names, identity or registration numbers, contact details, addresses, tax numbers, bank details, share subscription and shareholding details, FICA documents and beneficial ownership information, including information about the natural persons who ultimately own or control a company or trust.
Directors, Trustees and Representatives of Juristic Persons	Names, identity numbers, contact details, addresses and proof of authority.
Visitors to Sites and Offices	Names, contact details and office access control records

11.3. **Third Party Recipients to Whom We Share Personal Information**

Where necessary and lawful, Blok may supply personal information to the following categories of recipients:

Category of personal information	Recipients or Categories of Recipients to whom the personal information may be supplied
Identity, contact, property-enquiry, apartment-preference, buyer, verification and FICA-related, property-transaction, contractual, technical, usage, marketing, correspondence and employment-related data, as relevant to the recipient and purpose.	- Internal recipients, including Blok's directors, employees and authorised personnel with a legitimate need to know, and Blok's affiliates and related entities (if any), where permitted by applicable law; - Authorised service providers and operators supporting CRM, cloud hosting and storage, IT infrastructure, website operations, communications and email delivery, security, verification, marketing, advertising and analytics, subject to applicable contractual and legal safeguards; and property portals where information is exchanged under the relevant arrangements; - Relevant property-transaction participants and professional advisers where necessary and lawful; the relevant building's body corporate once a buyer becomes an apartment owner, where necessary for property or building management and otherwise lawful; competent authorities, regulators and law-enforcement agencies where required or permitted by law; and parties involved in a corporate transaction, subject to applicable law and appropriate safeguards;

	- Conveyancing attorneys, bond originators and banks; the Financial Intelligence Centre, the Companies and Intellectual Property Commission, deeds offices and municipalities; auditors, accountants and legal advisers; and payroll and benefit providers, the Department of Employment and Labour and the Compensation Fund in respect of employee information; - National governments and/or their respective authorities pursuant to our adherence with legislative requirements (such as the South African Revenue Service).

11.4. **International Transfers**

11.4.1. Blok may transfer, store, host, allow access to or otherwise process personal information outside South Africa for the purpose of -

11.4.1.1. providing, hosting, maintaining and supporting Blok's website, CRM, property-enquiry, buyer-relationship, communications, marketing, reporting and related business operations;

11.4.1.2. using service providers for technology, cloud storage, CRM, accounting, communications, marketing, analytics, support, verification and business administration, and interacting with property portals that may operate internationally;

11.4.1.3. cloud storage and authorised remote access by service providers outside South Africa where necessary for these purposes, subject to applicable data-processing arrangements and safeguards; or

11.4.1.4. to engage with regulatory bodies.

11.4.2. Where Blok transfers personal information to a third party outside South Africa, it will comply with POPIA's cross-border transfer requirements, relying on an applicable legal basis or appropriate protections as required in the circumstances. Blok does not limit its cloud or service-provider processing to a particular server location.

11.5. **Data Security**

To protect personal information against loss, damage, unauthorised destruction, unlawful access or processing, Blok implements reasonable technical and organisational measures appropriate to the information and risks involved. These include role-based CRM access for designated personnel and mandatory two-factor authentication across its systems. Operators who process personal information on Blok's behalf are bound by written agreements requiring them to keep it confidential and secure. Where Blok has reasonable grounds to believe that personal information has been accessed or acquired by an unauthorised person, it will investigate and contain the incident and notify the Information Regulator and affected data subjects as required by POPIA.

Retention and deletion are managed in accordance with Blok's internal retention requirements. Personal information is retained only for as long as necessary for the relevant purpose or as

required or permitted by applicable law, contract, dispute, complaint, investigation, audit or legal hold. Where retention is no longer justified, information is deleted, destroyed or de-identified as appropriate. Records obtained in terms of the Financial Intelligence Centre Act 38 of 2001 are kept for at least five years from the end of the business relationship or the conclusion of the single transaction, as required by that Act.

12. AVAILABILITY OF PAIA MANUAL

12.1. Physical inspection of this manual can be arranged by appointment through the Information Officer. A copy of this PAIA Manual is also available -

12.1.1. on our website, at www.blok.co.za

12.1.2. to any person upon request and upon the payment of a reasonable prescribed fee; and

12.1.3. to the Information Regulator upon request.

12.2. The fee for a copy of this PAIA Manual, as contemplated in Annexure B of the Regulations, shall be payable per each A4-size photocopy made.

13. UPDATE TO THIS PAIA MANUAL

13.1. This PAIA Manual will be reviewed by the Company's IO at least annually and updated as necessary to reflect material changes in the Company's records, processing activities, contact details or applicable law.

13.2. This PAIA Manual was last updated on 11 November 2026.

Thank you for your interest and if you have any questions, please direct them to the IO.

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Jacques Eliazer van Embden, Information Officer