

PAIA MANUAL

In terms of s.51 of the Promotion of Access to Information Act 2 of 2000 (as amended)

Lango Management SA (Pty) Ltd

Registration Number: 2019/067639/07

1. Introduction and Purpose of this Manual

This Manual is published in terms of section 51 of the Promotion of Access to Information Act 2 of 2000 ("**PAIA**"), as amended. It applies to Lango Management SA (Pty) Ltd ("**LMSA**"), a private body as defined in PAIA. This Manual provides a reference to the records held by LMSA and the process for requesting access to such records.

2. Definitions

Unless otherwise indicated, terms used in this Manual have the meaning assigned to them in PAIA. Key definitions include: "access fee", "information officer", "Information Regulator" "personal information", "private body", "record", "requester" and "third party".

3. Guide on How to Use PAIA

In terms of section 10 of PAIA, the Information Regulator has compiled a Guide containing information to assist persons wishing to exercise their rights under PAIA. The Guide is available from the Information Regulator at <https://inforegulator.org.za/paia/> or from the Information Regulator's offices.

4. Records Available in Terms of Other Legislation

LMSA retains records in accordance with, inter alia, the following legislation (where applicable):

- 4.1 Basic Conditions of Employment Act 75 of 1997
- 4.2 Companies Act 71 of 2008
- 4.3 Compensation for Occupational Injuries and Diseases Act 130 of 1993
- 4.4 Electronic Communications and Transactions Act 25 of 2002
- 4.5 Employment Equity Act 55 of 1998
- 4.6 Immigration Act 13 of 2002
- 4.7 Income Tax Act 58 of 1962
- 4.8 Labour Relations Act 66 of 1995
- 4.9 Occupational Health and Safety Act 85 of 1993
- 4.10 Pension Funds Act 24 of 1956
- 4.11 Promotion of Access to Information Act 2 of 2000
- 4.12 Protection of Personal Information Act 4 of 2013
- 4.13 Securities Transfer Tax Act 25 of 2007
- 4.14 Skills Development Levies Act 9 of 1999

- 4.15 Tax Administration Act 28 of 2011
- 4.16 Unemployment Insurance Act 63 of 2001
- 4.17 Unemployment Insurance Contributions Act 4 of 2002
- 4.18 Value-Added Tax Act 89 of 1991

5. Categories of Records Held by LMSA

The following categories of records are held, to the extent applicable, in respect of the following subjects:

Category of Records	Subjects
5.1 Human resources and employment records	Employees Directors
5.2 Financial and accounting records	Lango group entities Tenants and their representatives Prospective acquisition targets
5.3 Tax records, including SARS filings	Employees Directors
5.4 IT systems and electronic communications records	Employees Directors Parties communicating with Lango
5.5 Supplier / service provider agreements	Suppliers Service Providers
5.6 Governance records (board, shareholder and statutory records)	Employees Directors Lango group entities Shareholders
5.7 Compliance and regulatory filings	Employees Directors

6. Records Automatically Available

No categories of records are automatically available without a formal PAIA request.

7. Request Procedure

A requester must complete the prescribed Form 2 (*Request for Access to Record*) in terms of the PAIA Regulations, 2021. The request must be submitted to the information officer at the address or email listed below. The request must provide sufficient particulars to identify the

record requested, the identity of the requester, the form of access required, and proof of authority where applicable. LMSA will notify the requester of its decision within 30 days of receipt of the request, as required by section 56 of PAIA. If the request involves a third party, LMSA will comply with the notification procedures in sections 71 to 73 of PAIA.

8. Applicable Fees

The request fee payable by a requester is **R140.00**, unless the request relates to their own personal information. The access fees prescribed under the PAIA Regulations, 2021 include:

- 8.1. **R2.00** per A4 black-and-white photocopy or printed page;
- 8.2. **R145.00** for each hour or part of an hour, excluding the first hour, reasonably required to search for and prepare the record for disclosure, not to exceed **R435.00**;
- 8.3. **R40.00** for a copy in a computer readable form or a copy of an audio record, on a flash drive (the flash drive to be provided by the requester);
- 8.4. **R40.00** for a copy in a computer readable form or a copy of an audio record, on a compact disc where the disc is provided by the requester, or **R60.00** where the disc is provided to the requester;
- 8.5. **R24.00** per A4-size page for a transcription of an audio record;
- 8.6. For the transcription or copying of visual images or audio records, the fee will be the amount charged by the relevant service provider (such work is outsourced);
- 8.7. Postage, email or other electronic transfer: the actual expense incurred (if any).

A deposit of one-third of the estimated access fee may be required where search time exceeds six hours. LMSA may withhold the record until all applicable fees have been paid. No fees will be charged in an amount exceeding the amount set forth under 'Fees in respect of private bodies' in Annexure B to the Regulations relating to the Promotion of Access to Information, 2021.

9. Grounds for Refusal of Access

Access to records may be refused in accordance with Chapter 4 of PAIA, including where disclosure would result in:

- 9.1. Unreasonable disclosure of personal information of a third party (section 63)
- 9.2. Disclosure of confidential information of a third party (section 64)
- 9.3. Breach of legal privilege (section 67)
- 9.4. Commercial harm to the private body (section 68)
- 9.5. Endangerment of safety or security (section 69)
- 9.6. Records subject to mandatory protection or other statutory prohibitions

10. Remedies Available if Request is Refused

As LMSA is a private body, there is no internal appeal procedure. A requester who is dissatisfied with a decision of LMSA in relation to a request for access may lodge a complaint with the Information Regulator in terms of section 77A of PAIA. A requester may apply to a court of competent jurisdiction for appropriate relief in terms of section 78 of PAIA only after the complaints procedure referred to in section 77A has been exhausted, and within the time periods prescribed in PAIA.

11. Processing of Personal Information

LMSA processes personal information in accordance with the Protection of Personal Information Act 4 of 2013 ("**POPIA**"). Details of such processing are set out in LMSA's Privacy Policy, available on its website. Requests for access to personal information are subject to both PAIA and POPIA. For the purposes of section 51(1)(c) of PAIA, the following information regarding LMSA's processing of personal information is provided:

- 11.1. **Purpose of processing:** LMSA processes personal information for purposes including the management of real estate assets and tenancies, financial administration, employee and human resources administration, supplier and service provider engagement, regulatory and statutory compliance, and general business administration.
- 11.2. **Categories of data subjects and of the information relating thereto:** data subjects may include employees, directors and officers, shareholders, tenants and their representatives, customers, suppliers and service providers, and other counterparties. The information processed may include identification and contact details, financial and banking details, employment and remuneration information, and contractual information.
- 11.3. **Recipients or categories of recipients:** personal information may be supplied to other entities within the Lango group, professional advisers, auditors, banks and financial institutions, operators and service providers acting on LMSA's behalf, and regulatory or governmental authorities where required by law.
- 11.4. **Cross-border processing or transfer:** personal information may be transferred to or processed by other entities within the Lango group and their service providers located outside the Republic of South Africa, including in jurisdictions such as the United Kingdom and the Republic of Mauritius. Any such transfer is effected in accordance with the conditions for trans-border information flows in section 72 of POPIA.
- 11.5. **Security measures:** LMSA has implemented appropriate, reasonable technical and organisational measures to secure the integrity and confidentiality of personal

information and to prevent its loss, damage or unauthorised destruction or access, as contemplated in section 19 of POPIA. A general description of these measures can be made available on request to the extent that disclosure would not prejudice that security.

12. Availability of this Manual

This Manual shall be made available for inspection at LMSA's principal place of business and on the website of the Lango group, www.langorealestate.com. A copy may be requested from the information officer, subject to payment of the fee set out in paragraph 8.1 above. This Manual will be made available to the Information Regulator upon request.

13. Information Officer Contact Details

Information Officer	Thomas Reilly, Chief Executive Officer
Email	thomas.reilly@langorealestate.com
Local Information Officer	Matthew Dalby, Chief Legal Officer
Email	matthew.dalby@langorealestate.com
Address for Requests (Physical & Postal)	Oxford & Glenhove Precinct 19 9 th Street Houghton Estate Johannesburg 2198 South Africa
Registered Office	323 Lynnwood Road Menlo Park Pretoria 0081 South Africa
Telephone number	+44 781 806 7466
Telefax number	N/A

14. Updating of this Manual

This Manual will be reviewed and updated from time to time as required by section 51 of PAIA.

15. Version History

Last Updated	2 July 2026
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