Principal: Madelein Venter
FFC:1233859
Comp Reg: 2025/527073/07
madelein@lyniesrealestate.co.za
0685198755
Date:

PAIA MANUAL
OF
LYNIES REAL ESTATE (PTY) LTD

Registration Number: 2025/527073/07
Property Practitioners Regulatory Authority (PPRA) Registration: [Insert Agency Registration Number]
Business FFC: 56550
Master Principal Property Practitioner: Madelein Venter
Prepared in terms of Section 51 of the Promotion of Access to Information Act 2 of 2000, as amended
Date of first issue: 26 November 2025
Date of revision: 12 October 2026
Version: 2.0

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1. INTRODUCTION

This PAIA Manual is prepared in accordance with Section 51 of the Promotion of Access to Information Act 2 of 2000 ("PAIA"), as amended.
Lynies Real Estate (Pty) Ltd ("Lynies Real Estate", "Lynies", "the Company" or "the private body") is a private body conducting business as a property practitioner and is regulated by the Property Practitioners Regulatory Authority ("PPRA") in terms of the Property Practitioners Act 22 of 2019 ("PPA").
The purpose of this Manual is to provide information concerning the records held by Lynies Real Estate and to explain the procedure to be followed when a person wishes to request access to such records.
The Manual is also intended to assist Lynies Real Estate in complying with the applicable requirements of PAIA, the Protection of Personal Information Act 4 of 2013 ("POPIA"), the PPA and applicable PPRA requirements.
The Manual must be read together with Lynies Real Estate's privacy, data-protection and internal compliance procedures.

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2. PURPOSE OF THE MANUAL

The purpose of this Manual is to:

1. **identify the records held by Lynies Real Estate;**
2. **identify the categories of records that may be requested;**
3. **explain how a requester may obtain access to records;**
4. **identify the circumstances in which access may be refused;**
5. **explain the fees that may apply;**
6. **provide the contact details of the person responsible for PAIA requests;**
7. **promote transparency and accountability; and**
8. **protect the privacy and personal information of clients, employees, property practitioners and other persons whose information is held by Lynies Real Estate.**

PAIA gives effect to the constitutional right of access to information held by public and private bodies where such information is required for the exercise or protection of a right.

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3. LEGISLATIVE AND REGULATORY FRAMEWORK

Lynies Real Estate operates within, and will take account of, the following legislation and regulatory requirements, insofar as applicable:
3.1 Constitution of the Republic of South Africa, 1996

In particular, Section 32, which provides for the right of access to information.
3.2 Promotion of Access to Information Act 2 of 2000 (PAIA)
PAIA gives effect to the constitutional right of access to information and regulates requests for records held by public and private bodies.
3.3 Protection of Personal Information Act 4 of 2013 (POPIA)
POPIA regulates the processing and protection of personal information and provides rights and responsibilities concerning personal information.
3.4 Property Practitioners Act 22 of 2019 (PPA)
The PPA regulates property practitioners and establishes the Property Practitioners Regulatory Authority.
3.5 Regulations and Rules applicable to property practitioners
Lynies Real Estate will comply with applicable regulations, rules, standards and directives issued under the PPA and by the PPRA.
3.6 Financial Intelligence Centre Act 38 of 2001 (FICA)
Where applicable, Lynies Real Estate will maintain records required for FICA compliance, including appropriate client identification and verification records.
3.7 Companies Act 71 of 2008
The Company will maintain applicable corporate and statutory records required by law.

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4. INFORMATION OFFICER

The Information Officer of Lynies Real Estate is:
Name: Madelein Venter
Designation: Principal Property Practitioner / Head of Private Body / Information Officer
Company: Lynies Real Estate (Pty) Ltd
Physical Address: 2 Ida Close Brackenfell 7440
Postal Address: same as above
Telephone: 0845723719
Email: info@lyniesrealestate.co.za
Website: www.lyniesrealestate.co.za
The Information Officer is responsible for, among other things:

- **facilitating compliance with PAIA and POPIA;**
- **dealing with requests for access to records;**
- **ensuring that appropriate internal procedures exist for handling information requests;**
- **protecting personal information against unauthorised access or disclosure;**
- **maintaining this Manual; and**
- **assisting requesters with the prescribed request process where reasonably possible.**

Where a Deputy Information Officer is appointed, the details will be recorded in this Manual and communicated through the Company's official channels.

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5. CONTACT DETAILS OF THE INFORMATION REGULATOR

The Information Regulator is responsible for monitoring and enforcing compliance with PAIA and POPIA.
Information Regulator
Physical Address:
JD House
27 Stiemens Street
Braamfontein
Johannesburg
2001
Postal Address:
P.O. Box 31533
Braamfontein
Johannesburg
2017
Telephone: 010 023 5200
Email: enquiries@inforegulator.org.za
Website: www.inforegulator.org.za
A requester may approach the Information Regulator where permitted by PAIA, including where a

request has been refused or has not been dealt with in accordance with PAIA.

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6. GUIDE ON HOW TO USE PAIA

The Information Regulator has published a Guide explaining how to use PAIA.
The Guide is available from the Information Regulator and provides information concerning:

- **the purpose of PAIA;**
- **the rights of requesters;**
- **how to make requests;**
- **the prescribed forms;**
- **applicable fees;**
- **remedies available to requesters; and**
- **the responsibilities of public and private bodies.**

The Information Regulator makes the PAIA Guide and prescribed forms available through its official website.

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7. RECORDS HELD BY LYNIES REAL ESTATE

Lynies Real Estate holds records in physical and/or electronic form.
The following categories of records may be held:
7.1 Corporate and statutory records
These may include:

- **registration documents;**
- **memorandum of incorporation;**
- **company resolutions;**
- **statutory registers;**
- **records relating to directors and officers;**
- **shareholder records where applicable;**
- **annual returns and company filings;**
- **business registration documentation; and**
- **other statutory corporate records.**

Access to certain records may be restricted by law or because they contain confidential or personal information.

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8. PROPERTY PRACTITIONER AND PPRA RECORDS

Lynies Real Estate may hold records relating to its registration and operation as a property practitioner, including:

- **PPRA registration records;**
- **Fidelity Fund Certificates;**
- **principal property practitioner records;**
- **property practitioner records;**
- **candidate property practitioner records;**
- **continuing professional development records;**
- **training and qualification records;**
- **compliance correspondence;**
- **PPRA submissions;**
- **audit and compliance records;**
- **disciplinary or regulatory correspondence, where applicable;**
- **inspection records;**
- **agency agreements and mandates;**
- **property transaction documentation; and**
- **records required to demonstrate compliance with the PPA and applicable PPRA requirements.**

Access may be restricted where records contain confidential information, personal information belonging to another person or information protected by law.

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9. PROPERTY AND TRANSACTION RECORDS

Depending on the services provided, Lynies Real Estate may hold records relating to:

- **property listings;**
- **property mandates;**
- **sole mandates;**
- **open mandates;**
- **buyer and seller records;**
- **landlord and tenant records;**
- **lease agreements;**
- **offers to purchase;**
- **agreements of sale;**
- **property disclosures;**
- **property inspection information;**
- **property reports;**
- **comparative market analyses;**
- **valuation-related information;**
- **commission records;**
- **invoices;**
- **statements;**
- **correspondence;**
- **photographs and marketing material;**
- **property advertising records;**
- **referral records;**
- **transaction administration records; and**
- **other records relating to property transactions.**

Access to these records is subject to the rights of the persons concerned and the limitations contained in PAIA and POPIA.

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10. CLIENT AND CUSTOMER RECORDS

Lynies Real Estate may hold personal information relating to:

- **sellers;**
- **buyers;**
- **landlords;**
- **tenants;**
- **property owners;**
- **prospective clients;**
- **purchasers;**
- **applicants;**
- **service providers;**
- **contractors;**
- **property practitioners;**
- **employees;**
- **applicants for employment; and**
- **other persons who interact with the Company.**

Such records may include:

- **names and contact details;**
- **identification information;**
- **addresses;**
- **correspondence;**
- **financial information where lawfully required;**
- **FICA verification information;**
- **proof of address;**
- **transaction information;**
- **banking information where necessary;**
- **employment information where required;**

- **records relating to property ownership;**
- **lease information;**
- **contractual information; and**
- **other information lawfully collected in connection with the Company's business.**

Personal information will be processed in accordance with POPIA and applicable law.

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11. FICA AND COMPLIANCE RECORDS

Where applicable, Lynies Real Estate may maintain records relating to client identification and verification.
These may include:

- **identity documents;**
- **company registration documents;**
- **trust documents;**
- **proof of address;**
- **beneficial ownership information;**
- **source-of-funds information where required;**
- **client verification records;**
- **risk assessments;**
- **compliance records;**
- **correspondence relating to FICA; and**
- **other legally required documentation.**

Because these records may contain highly confidential personal information, access may be restricted in accordance with PAIA, POPIA, FICA and other applicable legislation.

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12. FINANCIAL AND ACCOUNTING RECORDS

Lynies Real Estate may hold:

- **invoices;**
- **receipts;**
- **financial statements;**
- **accounting records;**
- **bank records;**
- **commission records;**
- **debtor and creditor records;**
- **payment records;**
- **trust account records, where applicable;**
- **records relating to rental income and deposits;**
- **audit and independent review records;**
- **tax records;**
- **accounting correspondence; and**
- **supporting financial documentation.**

Access may be refused where the records contain confidential third-party information or are protected by applicable legislation.

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13. HUMAN RESOURCES RECORDS

Lynies Real Estate may hold records concerning employees, contractors and property practitioners, including:

- **employment agreements;**
- **independent contractor agreements;**
- **remuneration information;**
- **commission arrangements;**
- **leave records;**
- **performance records;**
- **disciplinary records;**
- **training records;**
- **qualification records;**

- **identification and verification records;**
- **tax-related records; and**
- **other employment-related information.**

Access to another person's employment or personal information will generally be restricted unless a lawful basis for disclosure exists.

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14. MARKETING AND COMMUNICATION RECORDS

These may include:

- **website content;**
- **social-media content;**
- **advertising material;**
- **property photographs;**
- **brochures;**
- **newsletters;**
- **client communications;**
- **marketing campaigns;**
- **advertising records; and**
- **website analytics and related information.**

Certain records may be available publicly without a formal PAIA request.

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15. RECORDS AUTOMATICALLY AVAILABLE

Certain information may be available without a formal PAIA request, including information that Lynies Real Estate makes publicly available through:

- **its website;**
- **property listing platforms;**
- **social-media pages;**
- **advertising material;**
- **brochures;**
- **public marketing material; and**
- **other lawful public communications.**

A requester should first check whether the requested information is already publicly available before submitting a formal PAIA request.

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16. RECORDS THAT MAY BE REQUESTED

A requester may request access to records held by Lynies Real Estate where PAIA provides a right of access.
A request for access to records held by a private body must identify the record requested and the right the requester seeks to exercise or protect, together with an explanation of why the requested record is required for that purpose.
A request will be considered in accordance with PAIA, POPIA and other applicable legislation.

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17. HOW TO MAKE A PAIA REQUEST

A requester must submit a request using the prescribed PAIA Form 2 – Request for Access to Record.
The request should be submitted to the Information Officer using the contact details contained in this Manual.
The requester should provide:

1. **sufficient information to identify the record;**
2. **sufficient information to identify the requester;**
3. **the form of access required;**
4. **the right the requester seeks to exercise or protect; and**
5. **an explanation of why the requested record is required for the exercise or protection of that right.**

Where the request is made on behalf of another person, appropriate proof of authority must be provided.

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18. PROCESSING OF REQUESTS

Upon receiving a request, Lynies Real Estate will:

1. **acknowledge receipt where appropriate;**
2. **assess whether the request complies with PAIA;**
3. **identify the relevant records;**
4. **determine whether the records may lawfully be disclosed;**
5. **consider the rights and privacy of third parties;**
6. **consider any applicable grounds for refusal;**
7. **determine any applicable fees;**
8. **make a decision within the period prescribed by PAIA; and**
9. **communicate the decision to the requester.**

Where permitted by PAIA, the prescribed period may be extended in accordance with the Act.

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19. GROUNDS FOR REFUSAL

Lynies Real Estate may refuse access to a record where PAIA permits or requires refusal.
Examples may include records involving:

- **protection of personal information of another person;**
- **protection of commercial information;**
- **confidential information;**
- **protection of trade secrets;**
- **privileged information;**
- **information supplied in confidence;**
- **protection of the safety of individuals;**
- **protection of commercial interests;**
- **records relating to legal proceedings;**
- **legally protected confidential information; or**
- **other grounds recognised by PAIA.**

A refusal will, where required, be accompanied by reasons and information regarding the review or complaint mechanisms available to the requester.

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20. PROTECTION OF THIRD-PARTY INFORMATION

Where a requested record contains information relating to a third party, Lynies Real Estate will consider whether PAIA requires or permits consultation with that third party before disclosure.
Personal information belonging to another individual will not automatically be disclosed merely because a requester asks for it.
The Company's obligations under POPIA will be considered when processing all PAIA requests.

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21. PROTECTION OF PERSONAL INFORMATION

Lynies Real Estate recognises that PAIA and POPIA must be applied together.
The Company will take reasonable steps to:

- **process personal information lawfully;**
- **collect information for legitimate purposes;**
- **limit access to personal information;**
- **protect personal information against unauthorised access;**
- **maintain appropriate security safeguards;**
- **retain information only for as long as legally required or reasonably necessary;**
- **provide access to personal information where POPIA provides a right of access; and**
- **respect the privacy rights of data subjects.**

A PAIA request will not be used as a means of improperly obtaining another person's private information.

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22. PRESCRIBED FORMS

The following forms may be relevant to access-to-information requests:
Form 1: Request for a copy of the PAIA Guide.

Form 2: Request for Access to Record.
Form 3: Outcome of Request and Fees Payable.
Form 4: Internal Appeal Form, where applicable.
Form 5: Complaint Form to the Information Regulator.
The latest prescribed forms should be obtained from the Information Regulator to ensure that the current versions are used.

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23. FEES

Where permitted by PAIA, Lynies Real Estate may charge prescribed fees associated with processing a request.
Fees may include, where applicable:

- **request fees;**
- **access fees;**
- **search and preparation fees;**
- **reproduction fees;**
- **postage or delivery fees; and**
- **other fees permitted by PAIA.**

Where a fee is payable, the requester will be informed of the applicable amount and payment requirements.
Fees will not be charged where PAIA provides that a request is exempt from payment.

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24. FORM OF ACCESS

Where a request is granted, Lynies Real Estate will provide access in the form reasonably requested, subject to the provisions of PAIA and the practical circumstances relating to the record.
Access may include:

- **inspection of a record;**
- **copies of documents;**
- **electronic copies;**
- **printed copies;**
- **information extracted from electronic records; or**
- **another lawful form of access.**

Where the requested form of access would unreasonably interfere with the operation of Lynies Real Estate or the preservation of the record, another reasonable form of access may be provided where permitted by PAIA.

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25. INTERNAL REVIEW AND REMEDIES

Lynies Real Estate will communicate the outcome of a PAIA request to the requester.
Where PAIA does not provide for an internal appeal against a private body's decision, a requester may approach the Information Regulator in accordance with the applicable procedure.
A requester may also have the right to approach a court of competent jurisdiction where permitted by law.
The Information Regulator currently provides a prescribed complaint process for PAIA matters involving private bodies.

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26. RECORD RETENTION

Lynies Real Estate will retain records in accordance with:

- **applicable legislation;**
- **PPRA requirements;**
- **PPA requirements;**
- **FICA requirements where applicable;**
- **POPIA;**
- **tax requirements;**
- **Companies Act requirements; and**
- **the Company's internal record-retention procedures.**

Records will not be destroyed where there is a legal requirement to retain them or where they are subject

to a pending legal, regulatory, audit or compliance matter.

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27. SECURITY OF RECORDS

Lynies Real Estate will take reasonable and appropriate measures to protect records against:

- **unauthorised access;**
- **loss;**
- **destruction;**
- **alteration;**
- **unlawful disclosure; and**
- **other forms of misuse.**

Electronic records may be protected through appropriate access controls, passwords, backups and other reasonable security measures.
Physical records will be stored in a manner reasonably designed to prevent unauthorised access.

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28. AVAILABILITY OF THIS MANUAL

This Manual will be made available:

1. **on the Lynies Real Estate website;**
2. **at the Company's offices, where applicable; and**
3. **upon request, subject to any applicable requirements.**

The Company will review this Manual periodically and update it when necessary.
The Information Regulator requires PAIA Manuals to be available to members of the public and provides an online service for PAIA Manual submissions.

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29. PAIA ANNUAL REPORTING

Lynies Real Estate will comply with applicable annual reporting requirements relating to requests for access to information.
The Information Regulator currently provides an electronic portal for the submission of PAIA annual reports by private bodies. The annual reporting process relates to requests received and processed by the private body.
The Information Officer will maintain appropriate records of:

- **PAIA requests received;**
- **dates received;**
- **records requested;**
- **decisions made;**
- **requests granted;**
- **requests refused;**
- **fees charged;**
- **extensions granted;**
- **complaints or disputes; and**
- **other information required for reporting purposes.**

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30. PROPERTY PRACTITIONER COMPLIANCE

As a registered property practitioner, Lynies Real Estate will maintain records necessary to demonstrate compliance with the Property Practitioners Act and applicable PPRA requirements.
Such records may include records relating to:

- **Fidelity Fund Certificates;**
- **mandates;**
- **property transactions;**
- **trust monies;**
- **accounting records;**
- **audits;**
- **property practitioner registration;**
- **CPD;**
- **compliance inspections;**
- **complaints;**

- **disciplinary matters;**
- **client records;**
- **FICA verification;**
- **statutory records; and**
- **other regulatory requirements.**

The PPRA confirms that business property practitioners are subject to specific record-keeping, trust-accounting and audit requirements under the PPA.

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31. POPIA AND PAIA INTERACTION

PAIA and POPIA must be applied together.
Where a person requests access to their own personal information, the request may also be dealt with under the applicable POPIA provisions.
Where a requester seeks access to information relating to another person, Lynies Real Estate will consider the privacy rights of that person before making any disclosure.
The Company will seek to balance:

- **the right of access to information;**
- **the protection of personal information;**
- **confidentiality;**
- **contractual obligations;**
- **legal requirements; and**
- **the legitimate interests of the Company and affected third parties.**

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32. UPDATES TO THIS MANUAL

This Manual will be reviewed periodically and amended where necessary to reflect:

- **changes in legislation;**
- **changes in PAIA or POPIA requirements;**
- **changes in PPRA requirements;**
- **changes in the Company's business operations;**
- **changes in the Information Officer or Deputy Information Officer; and**
- **changes in contact details or record categories.**

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33. APPROVAL

This Manual is approved for and on behalf of:
LYNIES REAL ESTATE (PTY) LTD
Principal / Head of Private Body / Information Officer
Name: Madelein Venter
Signature: *MVenter*
Date: 13/10/2026

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34. VERSION CONTROL

Version	Date	Description
1.0	**26/11/2025**	**Initial PAIA Manual**
2.0	**12 October 2026**	**Updated PAIA Manual incorporating PAIA, POPIA, PPA and PPRA-related requirements**

ANNEXURE A
INFORMATION REGULATOR CONTACT INFORMATION
Information Regulator
Telephone: 010 023 5200
Email: enquiries@inforegulator.org.za
Website: www.inforegulator.org.za
The latest PAIA forms, guides and private-body manual template should be obtained from the Information Regulator's official website.

ANNEXURE B

INTERNAL PAIA REQUEST REGISTER

Lynies Real Estate should maintain an internal register containing at least:

Date Received Requester Record Requested PAIA Form Decision Date Responded Fee Notes

This register should be kept securely and should itself be protected against unauthorised access.

ANNEXURE C

RECORD CATEGORIES – QUICK REFERENCE

Category	Examples
Corporate	Registration, MOI, resolutions, statutory records
PPRA	FFCs, registration, CPD, compliance
Property	Mandates, offers, leases, sale records
Client	Contact, transaction and property information
FICA	ID, verification, beneficial ownership
Financial	Invoices, payments, accounting records
Trust	Trust receipts, payments and supporting records
HR	Employment and practitioner records
Marketing	Website, advertising, social media
Legal	Contracts, legal correspondence, disputes
POPIA	Personal-information processing records
Compliance	PAIA, POPIA, FICA and regulatory records

END OF PAIA MANUAL