



Protect

Protection of Personal Information Manual

(POPIA MANUAL)

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1. INTRODUCTION AND PURPOSE:

- 1.1 PEC Utility Management (Pty) Ltd (PEC hereafter) is a private company registered South Africa. PEC needs Personal Information relating to both individual and juristic persons in order to carry out its business and organisational functions.
- 1.2 The manner in which this information is processed and the purpose for which it is processed is determined by PEC. PEC is accordingly a Responsible Party for the purposes of the Protection of Personal Information Act 4 of 2013 (“POPIA”) and will ensure that the Personal Information of a Data Subject is processed in accordance with the provisions of POPIA and is obligated to comply with The Protection of Personal Information Act 4 of 2013 (POPIA hereafter).
- 1.3 POPIA requires PEC to inform its clients, consumers and employees as to the manner in which their personal information is gathered, used, protected, disclosed and destroyed.
- 1.4 PEC guarantees its commitment to protecting the member’s privacy and ensuring that their personal information is used appropriately, transparently, securely and in accordance with applicable laws.
- 1.5 This Policy sets out the manner in which PEC deals with client, consumer and employee personal information and stipulating the purpose for which said information is used.
- 1.6 The Policy will be made available on the PEC website at www.pecutilities.co.za and by requesting it from PEC’s head office.
- 1.7 The purpose of this policy is:
 - 1.7.1 To inform stakeholders;
 - 1.7.2 Comply with the laws in respect of personal information, it holds about data subjects;
 - 1.7.3 Follow good practice;
 - 1.7.4 Protect PEC’s reputation;
 - 1.7.5 Protect PEC from the consequences of a breach of its responsibilities; and
 - 1.7.6 Protect a Data Subject against loss or breach of their personal information.



2. **DEFINITIONS:**

- 2.1 **Data subject** means the person to whom personal information relates;
- 2.2 **POPIA** refers to the Protection of Personal Information Act 4 of 2013;
- 2.3 **Processing** means any operation or activity or any set of operations, whether or not by automatic means, concerning personal information, including:
- 2.3.1 the collection, receipt, recording, organisation, collation, storage, updating or modification, retrieval, alteration, consultation or use;
 - 2.3.2 dissemination by means of transmission, distribution or making available in any other form; or
 - 2.3.3 merging, linking, as well as restriction, degradation, erasure or destruction of information.
- 2.4 **Record** means any recorded information-
- 2.4.1 regardless of form or medium, including any of the following;
 - 2.4.1.1 writing of any material;
 - 2.4.1.2 information produced, recorded or stored by means of any tape-recorder, computer equipment, whether hardware or software or both, or other device, and any material subsequently derived from information so produced, recorded or stored;
 - 2.4.1.3 label, marking or other writing that identifies or describes anything of which it forms part, or to which it is attached by any means;
 - 2.4.1.4 book, map, plan, graph or drawing;
 - 2.4.1.5 photograph, film, negative, tape or other device in which one or more visual images are embodied so as to be capable, with or without the aid of some other equipment, of being reproduced;
 - 2.4.2 in the possession or under the control of the responsible party;
 - 2.4.3 whether or not it was created by the responsible party; and
 - 2.4.4 regardless of when it came into existence.
- 2.5 **Responsible Party** means a public or private body or any other person which, alone or in conjunction with others determines the purpose of and means for processing personal information, and shall, for purposes of this Policy, refer to PEC
- 2.6 **Personal Information** means information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person, including, but not limited to:

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- 2.6.1 information relating to the race, gender, sex, pregnancy, marital status, national, ethnic or social origin, colour, sexual orientation, age, physical or mental health, wellbeing, disability, religion, conscience, belief, culture, language and birth of the person;
 - 2.6.2 information relating to the education or the medical, financial, criminal or employment history of the person;
 - 2.6.3 any identifying number, symbol, e-mail address, physical address, telephone number, location information, online identifier or other particular assignment to the person;
 - 2.6.4 the biometric information of the person;
 - 2.6.5 the personal opinions, views or preferences of the person;
 - 2.6.6 correspondence sent by the person that is implicitly or explicitly of a private or confidential nature or further correspondence that would reveal the contents of the original correspondence;
 - 2.6.7 the views or opinions of another individual about the person and;
 - 2.6.8 the name of the person if it appears with other personal information relating to the person or if the disclosure of the name itself would reveal information about the person.
- 2.7 **Information Officer** means the person who is responsible for ensuring PEC's compliance with POPIA. The Director of Governance of PEC is elected as the designated Information Officer and is registered with the South African Information Regulator. PEC may elect a Deputy Information Officer to assist the Information Officer with his / her duties.
- 2.8 **Information Regulator** means an independent board that has been established in terms of section 39 of POPIA to empower, enforce and monitor compliance.
- 2.9 **Public Record** means a record that is accessible in the public domain, and which is in the possession of or under control of a public body, whether or not it was created by a public body.
- 2.10 **Processing** means any operation or activity or any set of operations, whether or not by automatic means, concerning personal information, including –
- 2.10.1 The collection, receipt, recording, organisation, collation, storage, updating or modification, retrieval, alteration, consultation or use;

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- 2.10.2 Dissemination by means of transmission, distribution or making available in any other form; or
 - 2.10.3 Merging, liking, as well as restriction, degradation, erasure or destruction of information.

3. POLICY STATEMENT AND RESPONSIBILITIES:

- 3.1 PEC guarantees its commitment to protecting clients, consumers and employees' privacy and ensuring their Personal information is used appropriately, transparently, securely and in accordance with applicable laws, as far as it applies to our specific industry.

4. COMPLIANCE WITH REGARDS TO PROTECTION OF PERSONAL INFORMATION:

- 4.1 Data subjects have the following rights:
 - 4.1.1 Being notified that their Personal Information is being collected by PEC;
 - 4.1.2 Know whether PEC holds Personal Information about them, and to access that information Any request for information must be handled in accordance with the provisions of PEC's PAIA Manual;
 - 4.1.3 Objection to PEC's use of personal information and request the deletion of such Personal Information (deletion would be subject to the PEC record keeping requirements);
 - 4.1.4 Notification if information is being used for something other than what was consented for;
 - 4.1.5 Establishing whether PEC holds information;
 - 4.1.6 Request the correction or deletion of inaccurate, irrelevant, excessive, out of date, incomplete, misleading or unlawfully obtained personal information;
 - 4.1.7 Object to the processing of Personal Information for direct marketing by means of unsolicited electronic communications;
 - 4.1.8 Lodge a complaint with the Information Regulator regarding an alleged infringement of any of the rights protected under POPIA and to institute civil proceedings regarding the alleged non-compliance with the protection of his, her or its personal information.

5. PURPOSE OF PROCESSING PERSONAL INFORMATION:

As outlined above, Personal Information may only be processed for a specific purpose. The purpose for which PEC processes or will process Personal Information is set out in Appendix 1 of this Policy.

6. CONDITIONS FOR LAWFUL PROCESSING:

- 6.1 Chapter 3 of POPIA provides for the minimum Conditions of Lawful Processing of Personal Information by a Responsible Party. These conditions may not be derogated from unless exclusions apply as outlined in POPIA.
- 6.2 PEC needs Personal Information relating to both individuals and juristic persons in order to carry out its business and organisational functions. The manner in which this information is processed and the purpose for which it is processed is determined by PEC. PEC, being a Responsible Party for purposes of POPIA, will accordingly ensure that the Personal Information of a Data Subject –
 - 6.2.1 Is processed lawfully, fairly and transparently. This includes the provision of appropriate information to Data Subjects when their data is collected by PEC, in the form of privacy or data collection notices. PEC must also have a legal basis (for example, consent_ to process Personal Information;
 - 6.2.2 Is processed only for the purpose for which it was collected;
 - 6.2.3 Will not be processed for a secondary purpose unless that processing is compatible with the original purpose;
 - 6.2.4 Is adequate, relevant and not excessive for the purposes for which it was collected;
 - 6.2.5 Is accurate and kept up to date;
 - 6.2.6 Will not be kept longer than necessary'
 - 6.2.7 Is processed in accordance with integrity and confidentiality principles; this includes physical and organisational measures to ensure that Personal Information, in both physical and electronic form, are subject to an appropriate level of security when stored, used and communicated by PEC, in order to protect against access and acquisition by unauthorised persons and accidental loss, destruction or damage; and is processed in accordance with the rights of the Data Subjects, where applicable.

7. CATEGORIES OF DATA SUBJECTS:

- 7.1 PEC may possess or possesses Records relating to clients and suppliers; board members of Homeowners Associations and Body Corporates, contractors and service providers;

members of Homeowners Associations and Body Corporates; members of the public who are either –

- 7.1.1 Tenants in buildings or properties, whether such properties are situated within a Sectional Title Scheme (“Complex”) or an Estate;

Data Subject Category	Personal Information Processed
Natural Persons	Full names and Surname; contact details; physical address and postal address (including proof of residence); date of birth; Identity Number (and a copy of the Data Subjects ID); Passport Number (where a non-resident); financial information; Tax related information; nationality; gender.
Juristic Persons / Entities	Full names and Surname of contact persons; Name of legal entity; contact details of contact persons; physical address and postal address; financial information; Registration Number; Founding Documents; Tax related information; authorized signatories, beneficiaries, ultimate beneficial owners
Contracted Service Providers	Full names and Surname of contact persons; Name of legal entity; contact details of contact persons; physical address and postal address; financial information; Registration Number; Founding Documents; Tax related information; authorized signatories, beneficiaries, ultimate beneficial owners
Board Members	Full names and Surname; contact details; physical address and postal address (including proof of residence); date of birth; Identity Number (and a copy of the Data Subjects ID); Passport Number (where a non-resident); financial information; Tax related information; nationality; gender.

- 7.1.2 Landlords of properties, whether such properties are situated within a Complex or an Estate;

8. CATEGORIES OF RECIPIENTS:

- 8.1 PEC may supply the Personal Information to entities within the PEC group of companies, as well as service providers who render the following services; -

- 8.1.1 Capturing and organising of data;
- 8.1.2 Storing of data;
- 8.1.3 Sending of emails and other correspondence to stakeholders;
- 8.1.4 Conducting due diligence checks; and
- 8.1.5 Administration Assistance.



9. INFORMATION OFFICER RESPONSIBILITIES:

- 9.1 The Core focus or duties under POPIA for the Information Officer will be the following, but not limited to:
 - 9.1.1 Encourage compliance with the information protection conditions in terms of Section 55 of POPIA;
 - 9.1.2 Developing, publishing and maintaining a POPIA Policy which addresses all relevant provisions of the POPIA Act;
 - 9.1.3 Reviewing the POPIA Act and periodic updates as published;
 - 9.1.4 Ensuring that POPIA Act induction training takes place for all staff;
 - 9.1.5 Ensuring that periodic communication awareness on POPIA Act responsibilities takes place;
 - 9.1.6 Ensuring that Privacy Notices for internal and external purposes are developed and published;
 - 9.1.7 Handling data subject access requests;
 - 9.1.8 Approving unusual or controversial disclosures of personal data;
 - 9.1.9 Approving contracts with Data Operators;
 - 9.1.10 Ensuring that appropriate policies and controls are in place for ensuring the Information Quality of personal information;
 - 9.1.11 Ensuring that appropriate Security Safeguards in line with the POPIA Act for personal information are in place;
 - 9.1.12 Consider requests made pursuant to POPIA;
 - 9.1.13 Work with the Regulator in relation to investigations conducted pursuant to Chapter 6 against the SAOU; and
 - 9.1.14 Identify and govern all privacy related risks.
 - 9.1.15 Map all activities performed concerning the collection and storage of personal information i.e. before and post enactment of POPIA.
 - 9.1.16 Map all privacy laws and industry codes relevant to our activities.
 - 9.1.17 If applicable, know, understand, and ensure corporate compliance with all relevant laws of foreign jurisdictions in which we conduct business.
 - 9.1.18 Coordinate the development, implementation, and maintenance of corporate member (external) and employee (internal) privacy policies.
 - 9.1.19 Ensure compliance with corporate privacy policies and procedures throughout the body.
 - 9.1.20 Liaise with Human Resources and Legal Departments to ensure standards of disciplinary action and sanction for non-compliance.
 - 9.1.21 Liaise with Public Relations and Marketing Departments to create public information communications and procedures on privacy efforts, related issues and breaches.

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- 9.1.22 Create standards or scripts for responding to member or public enquiries.
 - 9.1.23 Create and implement procedures and standards to facilitate member verification of captured and stored personal information files.
 - 9.1.24 Monitor and control the privacy requirements and responsibilities of information processing service providers or operators in terms of sections 20 and 21 of POPIA.
 - 9.1.25 Manage breach and incident investigation processes
 - 9.1.26 Create and implement our privacy breach management plan, privacy alerts, and other privacy related operational issues.
 - 9.1.27 Create standards and procedures to manage any compromise in the security of the stored personal information correctly and appropriately.
 - 9.1.28 Investigate, analyse and document all privacy related incidents and complaints.
 - 9.1.29 Apply investigation findings to update standards, processes and systems as an on-going operational improvement routine.

10. TRANS BORDER INFORMATION FLOWS:

- 10.1 The scope of this aspect of the policy is defined by the provisions of the POPIA Chapter 9.
- 10.2 PEC will ensure that the POPIA Chapter 9, Section 72 is fully complied with. Compliance with Section 72 will be achieved through the use of the necessary contractual commitments from the relevant third parties.

11. SAFEGUARDING INFORMATION:

- 11.1 It is a requirement of POPIA to adequately protect the Personal Information that PEC holds and to avoid unauthorized access and use of your Personal information. PEC will continuously review its security controls and processes to ensure that member Personal Information is secure.
- 11.2 The following procedures are in place in order to protect the consumer's Personal Information:
 - 11.2.1 PEC's information officer is Nico Pienaar whose details are available below and who is responsible for compliance with the conditions of the lawful processing of personal information and other provisions of POPIA.
 - 11.2.2 This Policy has been put in place throughout PEC and training on this policy and the POPIA is provided to all PEC staff.

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- 11.2.3 PEC has done a risk assessment to determine where the risk to its data subjects lie. Security measures are implemented or will be implemented by PEC in order to ensure that these risks are addressed and that the Data Subject's Personal Information that is processed by PEC is safeguarded and processed in accordance with the Conditions of Lawful Processing,
 - 11.2.4 PEC have identified the relevant role players and appointed the correct people to safeguard Data Subjects' personal information.
 - 11.2.5 PEC has identified risks and has implemented the following:
 - 11.2.5.1 Incident Response Policy.
 - 11.2.5.2 Privacy Policy
 - 11.2.5.3 PAIA Manual.
 - 11.2.5.4 POPIA Policy.
 - 11.2.5.5 Awareness Training and risk assessment
 - 11.2.5.6 PEC has limited access to unstructured data.
 - 11.2.5.7 PEC has implemented access control.
 - 11.2.5.8 PEC has proper non-disclosure agreements and Service Level Agreements in place.
 - 11.2.5.9 PEC has security in place with regard to Memory Sticks, USB Ports, Mobile Devices and Shredders of documents.
 - 11.3 Each new employee will be required to sign an Employment Contract containing relevant clauses for the use and storage of employee information, or any other action so required, in terms of POPIA.
 - 11.4 Every employee currently employed within PEC will be required to sign an addendum to the Employment Contracts containing relevant consent clauses for the use and storage by PEC of employee information, or any other action so required, in terms of POPIA.
 - 11.5 PEC's current data subject information is stored on site by PEC's internal IT department.
 - 11.6 PEC captures all files electronically for back up purposes. All files will be archived at PEC's disaster recovery site (off-site) which will be available in case of a breach.
 - 11.7 All electronic files or data are backed up by the IT Department who is also responsible for system security which protects third party access and physical



threats. Internal IT Department is also responsible for Electronic Information Security.

11.8 A Security Incident Management Register will be kept logging any security incidents and to report on and manage said incidents this register will be maintained by an Appointed Security Manager, in PEC's case, the IT Manager.

11.9 Consent to process third party information is obtained during the introductory, procurement and need analysis stage of the relationship.

12. OBJECTION TO PROCESSING OF PERSONAL INFORMATION:

12.1 Section 11(3) of POPIA and regulation 2 of the POPIA Regulations provides that a Data Subject may, at any time object to the Processing of his/her Personal Information in the prescribed form 1 (attached to this Manual as Appendix 2) subject to exceptions contained in POPIA.

13. REQUEST FOR CORRECTION OF PERSONAL INFORMATION:

13.1 Section 24 of POPIA and regulation 3 of the POPIA Regulations provides that a Data Subject may be requested for their Personal information to be corrected/deleted in the prescribed Form 2 (attached to this Manual as Appendix 3)

14. COMPLAINT:

14.1 Section 5 of POPIA and regulation 7 of the POPIA Regulations provides that a Data subject may submit a complaint to the Information Regulator for interference with the protection of personal information in the prescribed Form 5 (attached to this Manual as appendix 4)

15. DESTRUCTION OF RECORDS:

15.1 Documents may be destroyed after the termination of the retention period specified in POPIA or as determined by PEC from time to time.

15.2 The documents must be shredded so that it will be impossible to reconstruct same.

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- 15.3 Deletion of electronic records must be done in consultation with the IT Service, to ensure that deleted information is incapable of being reconstructed and / or recovered.

16. EMPLOYEES AND OTHER PERSONS ACTING ON BEHALF OF PEC:

- 16.1 All employees and other persons acting on behalf of PEC will, during the course of the scope and duties of their services, gain access to and become acquainted with the personal information of certain clients, suppliers, and other employees.
- 16.2 Employees and other persons acting on behalf PEC are required to treat personal information as a confidential business asset and to respect the privacy of data subjects.
- 16.3 Employees and other persons acting on behalf of PEC may not directly or indirectly, utilise, disclose or make public in any manner to any person or third party, either within the firm or externally, any personal information, unless such information is already publicly known or the disclosure is necessary in order for the employee or person to perform his or her duties.
- 16.4 Employees and other persons acting on behalf of PEC must request assistance from the Information Officer if they are unsure about any aspect related to the protection of a data subject's personal information.
- 16.5 Employees and other persons acting on behalf of PEC must adhere to the Conditions of Lawful Processing of personal information, as provided for in chapter 3 of POPIA, at all times and must always obtain consent from the Data Subject before processing / using or storing their Personal Information.

17. SCOPE:

- 17.1 The scope of this aspect of the policy is written in support of the provisions of the POPIA, Chapter 5 - Part B.
- 17.2 At induction the documentation for staff contained in this policy document and other materials will be made available by the Information Officer. PEC's Information Officer will ensure that all staff that have access to any kind of personal information will have their responsibilities outlined during their induction procedures.

- 17.3 Continued training will provide opportunities for staff to explore POPIA Act issues through training, team meetings, and supervisions.

18. POLICY REVIEW:

- 18.1 The PEC Information Officer is responsible for an annual review to be completed prior to the policy anniversary date.
- 18.2 The PEC Information Officer will ensure relevant stakeholders are consulted as part of the annual review to be completed prior to the policy anniversary date.

19. DETAILS OF INFORMATION OFFICERS:

INFORMATION OFFICER DETAILS

NAME:	Riëtte Delport
TELEPHONE NUMBER:	012 846 3000
POSTAL ADDRESS:	P.O.Box 73639, Lynnwood Ridge, 0040
PHYSICAL ADDRESS:	128 Siersteen Street, Silvertondale, Pretoria
EMAIL ADDRESS:	popia@pecgroup.co.za

DEPUTY INFORMATION OFFICER DETAILS

NAME:	Nico Pienaar
TELEPHONE NUMBER:	012 846 3000
POSTAL ADDRESS:	P.O.Box 73639, Lynnwood Ridge, 0040
PHYSICAL ADDRESS:	128 Siersteen Street, Silvertondale, Pretoria
EMAIL ADDRESS:	popia@pecgroup.co.za

APPENDIX 1

PURPOSE OF PROCESSING PERSONAL INFORMATION

In accordance with Section 13 of the Protection of Personal Information Act 4 of 2013 ("POPIA") and as referenced in PEC's POPIA Manual, the table below sets out the purposes for which PEC Utility Management (Pty) Ltd processes or will process personal information.

Note: Personal information will only be processed for the purposes set out below, or for a further purpose that is compatible with the original purpose, in accordance with Section 15 of POPIA. The lawful basis column refers to the applicable grounds listed in Section 11(1) of POPIA.

Processing Category	Type of Personal Information Processed	Data Subjects Affected	Purpose of Processing	Lawful Basis (Section 11)
1. Client & Property Management	Full name, ID/passport number, physical address, postal address, email, telephone, financial information, account number	Homeowner Association board members; Body Corporate trustees; landlords; property owners	Entering into and performing management agreements; maintaining client records; property and account administration	Contract (s.11(1)(b)); Consent (s.11(1)(a))
2. Utility Billing & Invoicing	Name, account number, physical address, consumption data (electricity, water, gas), banking details, payment history	Residents; tenants; landlords; owners within managed schemes	Generating and issuing utility invoices; processing payments; reconciling accounts; managing arrears	Contract (s.11(1)(b)); Legal obligation (s.11(1)(c))

Processing Category	Type of Personal Information Processed	Data Subjects Affected	Purpose of Processing	Lawful Basis (Section 11)
3. Utility Consumption Monitoring	Name, account number, meter readings, consumption history, property unit details	Residents; tenants; owners within managed schemes	Reading and recording utility meters; compiling consumption reports; identifying irregular usage; reporting to municipalities	Contract (s.11(1)(b)); Legitimate interest (s.11(1)(f))
4. Debt Collection & Credit Management	Name, ID number, address, contact details, account balance, payment history, credit bureau information	Residents; tenants; owners in arrears	Following up on overdue accounts; issuing demand notices; engaging debt collection services; listing with credit bureaux as required by law	Contract (s.11(1)(b)); Legal obligation (s.11(1)(c)); Legitimate interest (s.11(1)(f))
5. Employee Administration & HR	Full name, ID number, date of birth, address, contact details, tax number, banking details, employment history, qualifications, medical information (where relevant), disciplinary records, emergency contacts	Employees; contractors; job applicants	Recruitment; employment contract administration; payroll and benefits processing; performance management; training records; PAYE and statutory compliance; termination administration	Contract (s.11(1)(b)); Legal obligation (s.11(1)(c)); Consent (s.11(1)(a))
6. Supplier & Service Provider Management	Contact person name, email, telephone, physical address, banking details, CIPC registration	Suppliers; contractors; service providers; consultants	Procurement; concluding and managing service agreements; processing payments; supplier due diligence; vendor database maintenance	Contract (s.11(1)(b)); Legal obligation (s.11(1)(c))

Processing Category	Type of Personal Information Processed	Data Subjects Affected	Purpose of Processing	Lawful Basis (Section 11)
	details, VAT number			
7. Legal & Regulatory Compliance	Any personal information relevant to a legal matter or regulatory obligation	All data subject categories	Complying with applicable legislation; responding to court orders, subpoenas or regulator requests; managing legal disputes; fulfilling tax and financial reporting obligations	Legal obligation (s.11(1)(c)); Legitimate interest (s.11(1)(f))
8. Communication & Correspondence	Name, email address, telephone number, postal address, content of correspondence	All data subject categories	Sending invoices, notices, circulars, and operational communications; responding to queries and complaints; community communication within managed schemes	Contract (s.11(1)(b)); Consent (s.11(1)(a)); Legitimate interest (s.11(1)(f))
9. Due Diligence & Risk Assessment	Name, ID/company registration number, address, directorship and beneficial ownership information, credit and risk profile	Prospective clients; suppliers; contractors; board members	Conducting background and credit checks prior to contracting; verifying identity and authority; assessing financial risk	Legitimate interest (s.11(1)(f)); Consent (s.11(1)(a))
10. Access Control & Physical Security	Name, ID number, vehicle registration, photograph, biometric data (where applicable), visitor records	Employees; contractors; visitors; residents; delivery personnel	Controlling access to PEC premises and managed properties; recording entry and exit; ensuring physical security of persons and assets	Legitimate interest (s.11(1)(f)); Consent (s.11(1)(a)) for biometrics



Processing Category	Type of Personal Information Processed	Data Subjects Affected	Purpose of Processing	Lawful Basis (Section 11)
11. IT Systems & Data Security	Username, system access logs, IP addresses, email activity logs	Employees; contractors; system users	Managing IT system access; monitoring for unauthorised access or security incidents; maintaining system integrity and data security	Legal obligation (s.11(1)(c)); Legitimate interest (s.11(1)(f))
12. POPIA & PAIA Compliance	Name, contact details, identity number, details of the data subject's request or complaint	All data subject categories	Processing and responding to data subject access requests, objections, correction requests, and complaints in terms of POPIA and PAIA	Legal obligation (s.11(1)(c))
13. Website & Digital Services	Name, email address, enquiry content, IP address, cookie data (where applicable)	Website visitors; prospective clients; members of the public	Responding to online enquiries; improving website functionality; compliance with digital communication obligations	Consent (s.11(1)(a)); Legitimate interest (s.11(1)(f))

The above purposes are not exhaustive. Where PEC intends to process personal information for a purpose not listed above, it will assess whether such further processing is compatible with the original purpose (Section 15 of POPIA) and, if not, will seek fresh consent or another applicable lawful basis.

APPENDIX 2 – FORM 1

OBJECTION TO THE PROCESSING OF PERSONAL INFORMATION

This form is prescribed in terms of Section 11(3) of the Protection of Personal Information Act 4 of 2013 ("POPIA") read with Regulation 2 of the POPIA Regulations, 2018. A Data Subject may, at any time, object to the processing of his/her personal information by submitting this completed form to PEC's Information Officer. Objection is subject to the exceptions contained in POPIA.

COMPLETED FORMS MUST BE SUBMITTED TO:

Information Officer: Riëtte Delpont

Email: popia@pecgroup.co.za | Tel: 012 846 3000

Postal: P.O. Box 73639, Lynnwood Ridge, 0040 |

Physical: 128 Siersteen Street, Silvertondale, Pretoria

SECTION A – DETAILS OF DATA SUBJECT (person making the objection)

Full name and surname

**Identity / Passport
number**

Postal address

Physical address

Telephone (work)

Telephone (cell)



Fax number	
Email address	
Capacity in which form is submitted (e.g. self, guardian, authorised representative)	

SECTION B – DETAILS OF RESPONSIBLE PARTY

Name of Responsible Party	PEC Utility Management (Pty) Ltd
Postal address	P.O. Box 73639, Lynnwood Ridge, 0040
Physical address	128 Siersteen Street, Silvertondale, Pretoria
Information Officer	Riette Delport
Contact email	popia@pecgroup.co.za

SECTION C – NATURE AND GROUNDS OF OBJECTION

Describe the processing you object to (what is being done with your personal information):

Identify the personal information concerned (what information is being processed):

Ground(s) for objection:

- ☐ The processing is causing or is likely to cause substantial damage or distress to me or another individual
- ☐ The processing is for direct marketing purposes and I have not given consent
- ☐ The processing is not necessary for the purposes for which it was collected
- ☐ My consent has been withdrawn
- ☐ Other (describe below)

If 'Other' or further explanation of grounds:

Relief requested:

- ☐ Cessation of all processing of my personal information
- ☐ Cessation of the specific processing described above only
- ☐ Deletion / destruction of my personal information
- ☐ Other (describe below)

If 'Other' or further details:

SECTION D – DECLARATION

I hereby declare that the information provided in this form is, to the best of my knowledge, true and correct, and that I am authorised to submit this objection.

Signature**Full name (print)****Date**



FOR OFFICE USE ONLY

Date received	
Reference number assigned	
Action taken / outcome	
Date of response to Data Subject	

APPENDIX 3 – FORM 2

REQUEST FOR CORRECTION OR DELETION OF PERSONAL INFORMATION

This form is prescribed in terms of Section 24 of the Protection of Personal Information Act 4 of 2013 ("POPIA") read with Regulation 3 of the POPIA Regulations, 2018. A Data Subject may request that PEC correct or delete personal information that is inaccurate, irrelevant, excessive, out of date, incomplete, misleading or unlawfully obtained, or that it is no longer necessary to retain for the purpose for which it was collected.

COMPLETED FORMS MUST BE SUBMITTED TO:

Information Officer: Riëtte Delport

Email: popia@pecgroup.co.za | Tel: 012 846 3000

Postal: P.O. Box 73639, Lynnwood Ridge, 0040 |

Physical: 128 Siersteen Street, Silvertondale, Pretoria

SECTION A – DETAILS OF DATA SUBJECT (person making the request)

Full name and surname

**Identity / Passport
number**

Postal address

Physical address

Telephone (work)

Telephone (cell)



Fax number	
Email address	
Capacity in which form is submitted (e.g. self, guardian, authorised representative)	

SECTION B – DETAILS OF RESPONSIBLE PARTY

Name of Responsible Party	PEC Utility Management (Pty) Ltd
Postal address	P.O. Box 73639, Lynnwood Ridge, 0040
Physical address	128 Siersteen Street, Silvertondale, Pretoria
Information Officer	Riëtte Delport
Contact email	popia@pecgroup.co.za

SECTION C – DESCRIPTION OF THE RECORD AND INFORMATION CONCERNED

Describe the record(s) or personal information that you wish to have corrected or deleted (be as specific as possible):

State why you believe the information is inaccurate, irrelevant, excessive, out of date, incomplete, misleading or unlawfully obtained:



SECTION D – NATURE OF REQUEST

Nature of request:	☐ Correction of inaccurate information ☐ Update of out-of-date information ☐ Deletion of information that is no longer necessary ☐ Destruction or deletion of the record in its entirety ☐ De-identification of the record ☐ Other (describe below)
If correction is requested – state the correct information or update required:	
If deletion/destruction is requested – state the grounds (e.g. purpose for which information was collected no longer exists; information was unlawfully obtained):	
Any additional information in support of this request:	

SECTION E – SUPPORTING DOCUMENTS

List any documents attached in support of this request (e.g. proof of identity, proof of updated information):



SECTION F – DECLARATION

I hereby declare that the information provided in this form is, to the best of my knowledge, true and correct, and that I am authorised to submit this request.

Signature

Full name (print)

Date

FOR OFFICE USE ONLY

Date received

**Reference number
assigned**

**Action taken (correction /
deletion / refusal)**

Reason if request refused

**Date of response to Data
Subject**



APPENDIX 4 – FORM 5

COMPLAINT TO THE INFORMATION REGULATOR

This form is prescribed in terms of Section 74 of the Protection of Personal Information Act 4 of 2013 ("POPIA") read with Regulation 7 of the POPIA Regulations, 2018. A Data Subject who believes that a Responsible Party has interfered with the protection of his/her personal information may submit a complaint to the Information Regulator using this form. **IMPORTANT:** This form is addressed TO THE INFORMATION REGULATOR, not to PEC. It is included in this Manual for the convenience of Data Subjects who wish to exercise their right to complain to the Regulator. PEC encourages Data Subjects to first raise their concerns with PEC's Information Officer before lodging a formal complaint.

COMPLETED FORMS MUST BE SUBMITTED TO THE INFORMATION REGULATOR:

JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001
P.O. Box 31533, Braamfontein, 2017
Email: infoereg@justice.gov.za | Tel: 010 023 5200
Website: www.infoeregulator.org.za

SECTION A – DETAILS OF COMPLAINANT

Full name and surname	
Identity / Passport number	
Postal address	
Physical address	



Telephone (work)	
Telephone (cell)	
Fax number	
Email address	
Are you submitting on behalf of another person?	☐ No – I am the affected Data Subject ☐ Yes – I am acting as authorised representative / guardian (attach proof of authority)
If acting in representative capacity – name of person being represented	

SECTION B – DETAILS OF RESPONDENT (Responsible Party complained against)

Full name / name of company	
Postal address	
Physical address	
Telephone number	
Email address	
Name of Information Officer (if known)	

SECTION C – NATURE OF THE COMPLAINT

Basis of complaint (select all that apply):

- ☐ Personal information was collected without my knowledge or consent
- ☐ Personal information was collected for a purpose other than stated
- ☐ Excessive personal information was collected
- ☐ My personal information was disclosed to an unauthorised third party
- ☐ My personal information was used for a purpose incompatible with the original purpose
- ☐ My personal information is inaccurate, out of date or misleading
- ☐ I was not notified of a security breach affecting my personal information
- ☐ My request for access, correction, deletion or objection was not responded to
- ☐ My personal information was retained longer than necessary
- ☐ My personal information of a child was processed without consent of a competent person
- ☐ Other (describe below)

Describe in detail the interference with your personal information (what happened, by whom, and how):

When did the interference occur or when did you become aware of it?



Steps already taken to resolve the matter with the Responsible Party (describe any complaint lodged and response received):

SECTION D – RELIEF SOUGHT

Relief requested from the Information Regulator:

- ☐ Investigation of the matter
- ☐ Order directing the Responsible Party to cease the processing
- ☐ Order directing the Responsible Party to correct or delete my personal information
- ☐ Order directing the Responsible Party to provide access to my personal information
- ☐ Any other appropriate enforcement action
- ☐ Other (describe below)

If 'Other' or further details of relief sought:

SECTION E – SUPPORTING DOCUMENTS

List any documents attached in support of this complaint (e.g. proof of identity, previous correspondence with the Responsible Party, any response received):



SECTION F – DECLARATION

I hereby declare that the information provided in this complaint is, to the best of my knowledge, true and correct, and that I am authorised to submit this complaint.

Signature	
Full name (print)	
Date	

Note to Data Subject: The Information Regulator will acknowledge receipt of your complaint and may request additional information. The Regulator has the authority to investigate, issue enforcement notices, and impose administrative fines for non-compliance with POPIA. For further information, visit www.inforegulator.org.za.