

ACCESS TO INFORMATION MANUAL

PAIA Manual

Glensburg (Pty) Ltd

Glensburg Town Planners · Glensburg Cities Institute

Compiled in terms of section 51 of the Promotion of Access to Information Act 2 of 2000, read with the Protection of Personal Information Act 4 of 2013 and the regulations made under both Acts.

VERSION

2.0

EFFECTIVE

22 September 2026

NEXT REVIEW

September 2027

REG. NO.

2023/764252/07

At a glance

A summary for requesters and data subjects. The Manual that follows governs; section and regulation references are to PAIA, POPIA and their regulations.

WHERE TO SEND IT

The Information Officer

Glensburg (Pty) Ltd
planning@glensburg.co.za · +27 10 442 5522
35 Fricker Road, Illovo, Johannesburg, 2196

HOW TO ASK

Use Form 2

Identify the record, the right you need it to exercise or protect, and the form of access you want. Attach proof of identity, and proof of authority if you act for someone else (Annexure B).

WHAT IT COSTS

R140.00 request fee

Access fees apply only if access is granted, and a deposit may be asked for if the search will take more than six hours (Annexure A). Confirming whether we hold personal information about you is free.

HOW LONG IT TAKES

30 days

A decision within 30 days of receiving your request. The period may be extended once, by up to 30 days, with written reasons.

YOUR PERSONAL INFORMATION

Object, correct or delete

Object to processing, or ask us to correct or delete your personal information, free of charge (Annexures D and E).

IF YOU DISAGREE

The Information Regulator

Complain to the Regulator within 180 days of our decision. PAIA provides no internal appeal against a private body.

DOCUMENT CONTROL

Document	PAIA Manual of Glensburg (Pty) Ltd
Version	2.0, superseding Version 1.0 of 21 January 2026
Effective date	22 September 2026
Approved by	The Director of Glensburg (Pty) Ltd, as head of the private body
Custodian	Information Officer
Review	At least annually, and on any material change in the law, in Glensburg's records or in its processing of personal information
Next scheduled review	September 2027
Classification	Public

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SECTION 51 COMPLIANCE INDEX

Requirement	Provision	In this Manual
Contact details of the head of the body	s 51(1)(a)(i)	Section 2
Other prescribed information (fees and forms)	s 51(1)(a)(ii)	Annexures A to E
Description of the Guide and how to obtain it	s 51(1)(b)(i); reg 3	Section 3
Latest section 52(2) notice; voluntary disclosure	s 51(1)(b)(ii); reg 5	Section 4
Records available in terms of other legislation	s 51(1)(b)(iii)	Section 5
Detail to facilitate a request; subjects and categories of records	s 51(1)(b)(iv)	Sections 6 and 9
Purpose of processing personal information	s 51(1)(c)(i)	Paragraph 7.1
Categories of data subjects and of personal information	s 51(1)(c)(ii)	Paragraph 7.2
Recipients of personal information	s 51(1)(c)(iii)	Paragraph 7.3
Planned transborder flows	s 51(1)(c)(iv)	Paragraph 7.4
Information security measures	s 51(1)(c)(v)	Paragraph 7.5
Regular updating	s 51(2)	Section 13
Availability of the Manual	s 51(3)	Section 12

1 Introduction

PAIA s 51 · POPIA

1.1 About Glensburg

- 1.1.1** Glensburg (Pty) Ltd ("Glensburg"), registration number 2023/764252/07, is a South African town planning and architecture practice trading as Glensburg Town Planners. From its office in Illovo, Johannesburg, Glensburg prepares and prosecutes land development applications, provides strategic spatial planning, architectural and development advisory services, and represents clients before municipal planning tribunals and appeal authorities. Its clients include private landowners, corporate developers and the public sector.
- 1.1.2** Glensburg's planning and architectural work is led by professionals registered with the South African Council for Planners (SACPLAN) and the South African Council for the Architectural Profession (SACAP).
- 1.1.3** Glensburg also operates the Glensburg Cities Institute ("the Institute"), its research and publishing unit, which produces research and commentary on urban policy and planning. The Institute is not a separate legal entity: its records are records of Glensburg and are covered by this Manual.
- 1.1.4** Glensburg's work involves rights in land, statutory applications to municipalities and other organs of state, and personal and commercial information entrusted to it by clients and others. It handles that information in accordance with the transparency, accountability and respect for privacy to which PAIA and POPIA give effect.

1.2 Purpose of this Manual

- 1.2.1** PAIA gives effect to the right of access to information in section 32 of the Constitution. Section 51 of PAIA requires the head of every private body to make available a manual that describes the records the body holds and how access to them may be requested. As amended by POPIA, section 51 also requires the manual to describe how the body processes personal information.
- 1.2.2** This Manual enables any person to:
- (a) contact the officers responsible for access to information and for the protection of personal information at Glensburg;
 - (b) find the records that are available without a formal request, and the records that other legislation makes available;
 - (c) identify the subjects on which Glensburg holds records and the categories of records held on each subject;
 - (d) make a request for access to a record, and understand the fees, timeframes and grounds on which access may be refused;
 - (e) understand how Glensburg processes personal information, and how data subjects may exercise their rights under POPIA; and
 - (f) pursue the remedies available under PAIA and POPIA.

1.3 Scope and application

- 1.3.1** This Manual applies to every record of Glensburg, including records of the Institute, in whatever form or medium the record exists and whenever it came into existence (section 3 of PAIA).
- 1.3.2** A record in the possession or under the control of an employee of Glensburg acting in that capacity, or of an independent contractor engaged by Glensburg acting in that capacity, is regarded as a record of Glensburg (section 4 of PAIA).

- 1.3.3** The description of a subject or category of records in this Manual does not mean that access to any record will be granted. Every request is decided on its own merits in accordance with PAIA.
- 1.3.4** PAIA does not apply to a record requested for the purpose of criminal or civil proceedings after those proceedings have commenced, where the production of or access to the record is provided for in any other law (section 7 of PAIA). Such records must be sought under the rules that govern the proceedings.

1.4 Definitions

Terms defined in PAIA or POPIA bear the same meaning in this Manual. In addition:

Constitution	The Constitution of the Republic of South Africa, 1996.
data subject	The person to whom personal information relates.
Guide	The guide on how to use PAIA, compiled and updated by the Information Regulator in terms of section 10 of PAIA.
head	In relation to Glensburg, its Director, as the officer equivalent to a chief executive officer, or a person duly authorised by the Director (section 1 of PAIA).
Information Officer	In relation to Glensburg, its head, or a person duly authorised by the head to act as such (section 1 of PAIA, read with section 1 of POPIA).
Information Regulator or Regulator	The Information Regulator established by section 39 of POPIA.
PAIA	The Promotion of Access to Information Act 2 of 2000, as amended.
PAIA Regulations	The Regulations relating to the Promotion of Access to Information, 2021 (GN R757, Government Gazette 45057 of 27 August 2021).
personal information	Information relating to an identifiable, living natural person and, where applicable, an identifiable, existing juristic person, as defined in section 1 of POPIA.
personal requester	A requester seeking access to a record containing personal information about the requester.
POPIA	The Protection of Personal Information Act 4 of 2013.
POPIA Regulations	The Regulations relating to the Protection of Personal Information, 2018, as amended with effect from 17 April 2025 (Government Gazette 52523).
processing	Any operation or activity concerning personal information, as defined in section 1 of POPIA.
record	Any recorded information, regardless of form or medium, in the possession or under the control of Glensburg, whether or not Glensburg created it.
requester	Any person, including a public body or an official of a public body, who requests access to a record of Glensburg, or a person acting on that person's behalf.
third party	Any natural or juristic person, other than the requester, to whom or to which a requested record relates.

2 Contact details

PAIA s 51(1)(a)

2.1 Glensburg's contact details for the purposes of PAIA and POPIA are:

Registered name	Glensburg (Pty) Ltd
Trading names	Glensburg Town Planners; Glensburg Cities Institute
Registration number	2023/764252/07
Head of the private body	The Director of Glensburg (Pty) Ltd
Information Officer	Contactable at the addresses and numbers below. Glensburg's head is its Information Officer unless the head duly authorises another person to act as such (section 1 of PAIA, read with section 1 of POPIA).
Street address	35 Fricker Road, Illovo, Johannesburg, 2196
Postal address	35 Fricker Road, Illovo, Johannesburg, 2196
Telephone	+27 10 442 5522
Fax	Not in use
Email	planning@glensburg.co.za
Website	glensburg.co.za

- 2.2 Requests under PAIA, and objections and requests under POPIA, should be addressed to the Information Officer. Marking an email "PAIA request" or "POPIA request" in the subject line helps us route it promptly.
- 2.3 A request or document sent by email is in writing, and an electronic signature is accepted (regulation 1 of the PAIA Regulations, read with sections 12 and 13 of the Electronic Communications and Transactions Act 25 of 2002).
- 2.4 The Information Officer is responsible for encouraging Glensburg's compliance with the conditions for the lawful processing of personal information, for dealing with requests made under PAIA and POPIA, and for working with the Regulator in any investigation (section 55(1) of POPIA). The Information Officer must also ensure that a compliance framework is developed, implemented, monitored, maintained and continually improved (regulation 4 of the POPIA Regulations).

3 The Guide on how to use PAIA

PAIA s 51(1)(b)(i) · s 10

- 3.1 The Information Regulator has, in terms of section 10 of PAIA, updated and made available the Guide on how to use PAIA, in an easily comprehensible form, for any person who wishes to exercise a right contemplated in PAIA or POPIA. The edition current at the date of this Manual was published in October 2021.
- 3.2 The Guide is available in each of the official languages and in braille. It describes, among other things:
- (a) the objects of PAIA and POPIA;
 - (b) the contact details of the information officer of every public body, and of every deputy information officer of public and private bodies;

- (c) the manner and form of a request for access to a record of a public body and of a private body;
- (d) the assistance available from information officers and from the Regulator;
- (e) the remedies available in law, including complaints to the Regulator and applications to court;
- (f) the provisions of PAIA on manuals and on the voluntary disclosure of records; and
- (g) the fees payable in relation to requests for access, and the regulations made under PAIA.

3.3 The Guide may be obtained:

- (a) from the Regulator's website, info regulator.org.za;
- (b) by inspection at Glensburg's office during normal business hours (regulation 3(1) of the PAIA Regulations); and
- (c) on written request to the Information Officer on Form 1 (Annexure C), or to the Regulator.

3.4 Glensburg does not charge for a copy of the Guide or for its inspection (regulation 3(3) of the PAIA Regulations).

4 Records available without a request

PAIA s 51(1)(b)(ii) · s 52

4.1 At the date of this Manual, no notice has been published in terms of section 52(2) of PAIA regarding Glensburg's records.

4.2 Glensburg voluntarily makes the categories of records below available without a person having to request access in terms of PAIA (section 52(1) of PAIA, read with regulation 5 of the PAIA Regulations). Records published on the website are free. A copy of any other record in this section may be obtained on payment of the reproduction fees in items 2 to 8 of Annexure A (regulation 5(3)).

Category	Records	Where available
Corporate information	Company profile; registered name, registration number and contact details; descriptions of Glensburg's services	Website; on request
Research and publications	Reports, policy briefs, working papers and commentary published by the Glensburg Cities Institute; practice guides and explainers	Website
Service and fee information	Descriptions of application types and processes; indicative fee information, where published	Website
Compliance documents	This Manual; the Glensburg Privacy Policy	Website; Glensburg's office

RECORDS HELD BY PUBLIC BODIES

Many records connected with land development are also held by public bodies, and it is often quicker to obtain them at source. An application lodged with a municipality, with its supporting documents, is held by that municipality and is ordinarily open for inspection during the public participation period set by the applicable municipal planning by-law. Registered deeds are held by the Deeds Registries, and diagrams and general plans by the Surveyor-General. A record of a public body may be requested from that body under Part 2 of PAIA.

5 Records held in terms of other legislation

PAIA s 51(1)(b)(iii)

5.1 Glensburg keeps records in terms of, or subject to, the legislation listed below. Where legislation other than PAIA gives a person a right of access to a record, access may also be requested in terms of that legislation. The list is not exhaustive and is reviewed with this Manual.

Legislation	Records (examples)
Companies Act 71 of 2008	Memorandum of Incorporation; registers of directors and securities; minutes and resolutions; annual returns; accounting records
Tax Administration Act 28 of 2011; Income Tax Act 58 of 1962; Value-Added Tax Act 89 of 1991	Tax and VAT returns, assessments and supporting records; correspondence with SARS
Basic Conditions of Employment Act 75 of 1997; Labour Relations Act 66 of 1995; Employment Equity Act 55 of 1998	Employment contracts; records of working time and remuneration; disciplinary records; employment equity records where applicable
Unemployment Insurance Act 63 of 2001; Unemployment Insurance Contributions Act 4 of 2002; Skills Development Act 97 of 1998; Skills Development Levies Act 9 of 1999	UIF and skills development levy declarations and payments; training records
Compensation for Occupational Injuries and Diseases Act 130 of 1993; Occupational Health and Safety Act 85 of 1993	Registration and assessment records; incident records
Spatial Planning and Land Use Management Act 16 of 2013; municipal planning by-laws	Land development applications; public participation records; objections and responses; decisions, conditions of approval and appeal records
Planning Profession Act 36 of 2002; Architectural Profession Act 44 of 2000	Professional registration and continuing professional development records
Deeds Registries Act 47 of 1937; Sectional Titles Act 95 of 1986; Land Survey Act 8 of 1997	Deeds Registry and Surveyor-General records obtained for applications and sectional title conversions
National Building Regulations and Building Standards Act 103 of 1977	Building plan submissions and approvals
National Environmental Management Act 107 of 1998; National Heritage Resources Act 25 of 1999	Environmental and heritage authorisations and comments associated with applications
Broad-Based Black Economic Empowerment Act 53 of 2003	B-BBEE affidavits or certificates
Copyright Act 98 of 1978	Publication, licensing and permission records of the Institute
Electronic Communications and Transactions Act 25 of 2002	Electronic communications, transactions and signatures
Protection of Personal Information Act 4 of 2013; Promotion of Access to Information Act 2 of 2000	Records of processing, requests, objections and security compromises; this Manual

6 Subjects and categories of records held

PAIA s 51(1)(b)(iv)

- 6.1** Glensburg holds records on the subjects and in the categories set out below. The description is intended to help a requester identify the record sought; it does not mean that access will be granted.
- 6.2** Client and project records frequently contain personal information of third parties, confidential commercial information supplied by clients, or privileged material. Access to such records is subject to the grounds of refusal in section 10 and to the third-party procedure in paragraph 9.6.

Subject	Categories of records
Corporate and governance	Memorandum of Incorporation; registration certificate; registers of directors and securities; minutes and resolutions; annual returns; B-BBEE documentation; insurance policies
Professional registration and standards	SACPLAN and SACAP registration records of professional staff; continuing professional development records; professional indemnity insurance
Client mandates	Engagement letters and mandates; powers of attorney; fee proposals and quotations; correspondence with clients
Land development applications	Applications for rezoning, subdivision, consolidation, township establishment, consent use, departures, building line relaxation, removal of restrictive conditions and related matters; motivating memoranda; zoning certificates; title deeds and Deeds Registry searches; diagrams and general plans; conveyancers' certificates and bondholders' consents; specialist reports; site development plans and layouts; municipal comments, decisions, conditions of approval and services agreements
Public participation, objections and hearings	Notices to owners and occupiers; proof of service and advertisement; objections and comments received; responses to objections; tribunal and appeal records; contravention notices and responses
Architecture and design	Architectural drawings; building plan submissions and approvals; building regulation compliance documentation
Development advisory	Planning due diligence reports; development potential and feasibility assessments
Research and publications (Institute)	Research plans; interview and fieldwork records; recordings, transcripts and datasets; participant information and consent records; manuscripts and drafts; editorial and peer-review correspondence; published outputs
Human resources	Recruitment records; employment contracts; personnel files; leave, performance and disciplinary records; payroll; PAYE, UIF and skills development levy records; training records; employment equity records where applicable; occupational health and safety records
Finance and tax	Annual financial statements; management accounts; accounting records; invoices and statements; banking records; asset register; tax and VAT returns; audit or independent review reports
Suppliers and sub-consultants	Appointments of land surveyors, engineers, conveyancers and specialist consultants; supplier and operator agreements; invoices; supplier registration details
Information technology	Information security records; system access and backup records; software licences; website hosting, domain and administration records; cookie consent records

Subject	Categories of records
Marketing and communications	Website content; newsletters and publication alerts; subscriber lists and consent records; enquiry and quotation request records; event records
Legal and compliance	Contracts; legal opinions and correspondence with legal advisers; litigation and dispute records; insurance claims; complaints; PAIA and POPIA records, including registers of requests and of security compromises

7 Processing of personal information

PAIA s 51(1)(c) · POPIA

7.1 Purposes of processing

7.1.1 Glensburg collects personal information for specific, explicitly defined and lawful purposes related to its functions and activities (section 13 of POPIA). Those purposes are:

- (a) performing professional mandates, including preparing, lodging and prosecuting land development and related applications, and providing architectural, design and development advisory services;
- (b) serving statutory notices, conducting public participation and responding to objections and comments, as the Spatial Planning and Land Use Management Act 16 of 2013 and municipal planning by-laws require;
- (c) representing clients before municipal planning tribunals, appeal authorities and courts;
- (d) responding to enquiries and requests for quotations, and concluding and administering agreements with clients, sub-consultants and suppliers, including invoicing and the recovery of fees;
- (e) recruiting, employing and administering staff;
- (f) conducting, publishing and disseminating research through the Institute;
- (g) sending newsletters and publication alerts to people who have asked to receive them, and managing events;
- (h) operating, securing and improving Glensburg's website, subject to the cookie preferences a visitor records;
- (i) complying with obligations imposed by law, including tax, labour, company and professional registration obligations, and obligations under PAIA and POPIA;
- (j) establishing, exercising or defending legal rights and claims, and obtaining professional advice and insurance; and
- (k) protecting the security of Glensburg's premises, systems and records.

7.2 Categories of data subjects and of personal information

Data subjects	Personal information that may be processed
Clients who are natural persons, including property owners and prospective purchasers	Names; identity numbers; contact details; residential and postal addresses; property descriptions, title deed and bond information; powers of attorney and signatures; correspondence; invoicing and payment information, including banking details where needed for payments or refunds
Clients that are juristic persons, and their directors, trustees, members and representatives	Registered names; registration and VAT numbers; names, identity numbers and contact details of representatives; resolutions and other proof of authority; property and transaction information

Data subjects	Personal information that may be processed
Enquirers and prospective clients	Names; contact details; property of interest; details of the enquiry or request for a quotation
Owners and occupiers of neighbouring properties, objectors and other interested and affected parties	Names; property descriptions; postal, physical and email addresses; comments, objections and representations made in a public participation process
Municipal and other officials, tribunal members and other professionals	Names; positions; business contact details; correspondence; professional registration details
Research participants (Institute)	Names or pseudonyms; organisational affiliations; contact details; interview recordings, notes and transcripts, including views and opinions; consent records
Newsletter subscribers and event participants	Names; email addresses; organisations; subscription preferences and consent records; attendance records
Website visitors	IP addresses; device and browser information; cookie identifiers and consent preferences; information submitted through contact and quotation forms
Employees, job applicants and interns	Names; identity numbers; contact details and addresses; qualifications and employment history; references; professional registration numbers; tax numbers; banking details; remuneration and benefits; leave, performance and disciplinary records; next-of-kin details; medical certificates; race and gender where required for employment equity and B-BBEE reporting
Service providers, sub-consultants and suppliers, and their personnel	Registered names; registration and VAT numbers; contact persons and details; banking details; B-BBEE status; professional registration details

- 7.2.1** Special personal information, such as health information in a medical certificate or information about race used for employment equity reporting, is processed only where POPIA authorises it (sections 26 to 33), for example to comply with an obligation imposed by law or with the data subject's consent.

7.3 Recipients of personal information

Recipients	Personal information that may be supplied
Municipalities, municipal planning tribunals and appeal authorities	Application documents, including owners' and applicants' details and property information; responses to objections
Other organs of state, including provincial departments and environmental, heritage and transport authorities	Information required for comments, consents and authorisations associated with an application
Members of the professional team: land surveyors, conveyancers, engineers, architects and specialist consultants	Information each needs to perform its part of a mandate
Courts, tribunals and legal advisers	Information needed to establish, exercise or defend rights
SACPLAN and SACAP	Registration and professional conduct information

Recipients	Personal information that may be supplied
SARS, the Department of Employment and Labour, the Unemployment Insurance Fund, the Compensation Fund and CIPC	Tax, payroll, employment and company information that the law requires to be submitted
Auditors or independent reviewers, accountants, banks and insurers	Financial and business information; information relevant to insurance cover and claims
Operators: IT, cloud storage, email, website hosting, consent management and communications providers	Personal information they process on Glensburg's behalf, under written contracts (sections 20 and 21 of POPIA)
Research collaborators and publishers (Institute)	Research data in de-identified form, or identified data only with the participant's consent
Law enforcement and regulatory authorities	Personal information that Glensburg is required by law to disclose

APPLICATIONS ARE PUBLIC DOCUMENTS

When an application is lodged with a municipality, the owner's details and property information form part of the application, which may be made available for public inspection in terms of the applicable municipal planning by-law. Objections and comments lodged by interested and affected parties are usually provided to the applicant, who must respond to them.

7.4 Planned transborder flows of personal information

7.4.1 Glensburg uses reputable enterprise cloud services, including Google Workspace and Microsoft Azure, to store and process records. These services may store or process personal information on servers outside South Africa. Service providers that support Glensburg's website and its consent management may also process website data outside South Africa.

7.4.2 Glensburg transfers personal information to a third party outside South Africa only where section 72 of POPIA permits it, including where:

- (a) the recipient is subject to a law, binding corporate rules or a binding agreement that provides an adequate level of protection, substantially similar to the conditions for lawful processing in POPIA;
- (b) the data subject consents to the transfer;
- (c) the transfer is necessary for the performance of a contract between the data subject and Glensburg, or for pre-contractual measures taken at the data subject's request; or
- (d) the transfer is necessary for the conclusion or performance of a contract concluded in the interest of the data subject between Glensburg and a third party.

7.5 Information security measures

7.5.1 Glensburg secures the integrity and confidentiality of personal information in its possession or under its control by taking appropriate, reasonable technical and organisational measures to prevent its loss, damage or unauthorised destruction, and its unlawful access or processing (section 19 of POPIA). The measures include:

- (a) **governance:** a designated Information Officer responsible for the compliance framework and for reviewing risks to personal information;

- (b) **access control:** access limited to personnel who need the information for their work, individual user accounts, password protection and multi-factor authentication on business systems;
- (c) **technical safeguards:** firewalls, anti-malware software, encryption of data in transit to and from Glensburg's website and cloud services, software updates and backups;
- (d) **physical safeguards:** controlled access to Glensburg's office and secure storage of paper records;
- (e) **people:** confidentiality obligations in employment and sub-consultant agreements, and internal awareness sessions on the protection of personal information;
- (f) **operators:** written contracts requiring operators to establish and maintain appropriate security measures (sections 20 and 21 of POPIA); and
- (g) **security compromises:** where there are reasonable grounds to believe that personal information has been accessed or acquired by an unauthorised person, notification of the Regulator and of affected data subjects as section 22 of POPIA requires.

7.5.2 This description is general so as not to compromise the measures it describes.

7.6 Retention of records

- 7.6.1 Glensburg retains records of personal information only for as long as the law requires or permits, or as long as they are needed for the purpose for which they were collected (section 14 of POPIA). Statutory minimum periods include seven years for company records (section 24 of the Companies Act 71 of 2008), five years for records supporting tax returns (section 29 of the Tax Administration Act 28 of 2011) and three years for prescribed employment records (section 31 of the Basic Conditions of Employment Act 75 of 1997). Project records may be kept longer where they remain relevant to rights in land, to professional obligations or to the defence of claims.
- 7.6.2 Records kept for research purposes are retained with appropriate safeguards against their use for any other purpose (section 14(2) of POPIA). Records that are no longer required are destroyed, deleted or de-identified in a manner that prevents their reconstruction (section 14(5)).

8 Rights of data subjects

POPIA ss 11, 23, 24, 69, 74

8.1 A data subject may, among other rights:

- (a) ask Glensburg to confirm, free of charge, whether it holds personal information about the data subject, and request the record or a description of that information, including the identity of the third parties, or categories of third parties, who have had access to it (section 23(1));
- (b) request the correction or deletion of personal information that is inaccurate, irrelevant, excessive, out of date, incomplete, misleading or obtained unlawfully, or the destruction or deletion of a record that Glensburg is no longer authorised to retain (section 24(1));
- (c) object, on reasonable grounds relating to the data subject's particular situation, to processing based on section 11(1)(d) to (f), and object at any time to processing for purposes of direct marketing (section 11(3));
- (d) withdraw consent at any time, without affecting the lawfulness of processing before the withdrawal (section 11(2)(b));
- (e) not receive direct marketing by means of unsolicited electronic communications, except as section 69 permits; and
- (f) lodge a complaint with the Information Regulator (section 74).

- 8.2 Access to your personal information.** Confirmation of whether Glensburg holds personal information about you is free. The record or a description of the information is provided at the prescribed fee, if any; where a fee is payable, Glensburg will first give you a written estimate and may require a deposit (section 23(3)). A request for the record itself is dealt with in the manner that section 53 of PAIA prescribes (section 25 of POPIA), using Form 2 (Annexure B), and may be refused on the grounds set out in section 10 (section 23(4)).
- 8.3 Objections, corrections and deletions are free.** An objection may be made on a form substantially similar to POPIA Form 1 (Annexure D), and a request for correction, deletion or destruction on a form substantially similar to POPIA Form 2 (Annexure E). No fee is payable for either (regulations 2 and 3 of the POPIA Regulations). You may submit them:
- (a) by hand at Glensburg's office, or by post;
 - (b) by email to planning@glensburg.co.za;
 - (c) by WhatsApp to +27 79 375 2704; or
 - (d) by telephone on +27 10 442 5522. An objection or request made by telephone is recorded electronically, and the recording or a transcription is made available to you on request, free of charge.
- 8.4** Glensburg will notify you of the action taken on a request for correction, deletion or destruction within 30 days of receiving it (regulation 3 of the POPIA Regulations). Where a correction affects decisions taken about you, Glensburg will, where reasonably practicable, inform each person to whom the information was disclosed (section 24(3) of POPIA).
- 8.5** Glensburg does not make decisions about data subjects based solely on the automated processing of personal information (section 71 of POPIA).
- 8.6** A complaint about the processing of personal information may be lodged with the Information Regulator at POPIAComplaints@inforegulator.org.za, in the manner prescribed by regulation 7 of the POPIA Regulations. You may raise a concern with the Information Officer at any time; doing so does not limit your right to complain to the Regulator.

9 How to request access to a record

PAIA ss 50, 53–60

9.1 The right of access

- 9.1.1** A requester must be given access to a record of Glensburg if (section 50(1) of PAIA):
- (a) the record is required for the exercise or protection of any rights;
 - (b) the requester complies with the procedural requirements of PAIA; and
 - (c) access is not refused on any ground set out in Chapter 4 of Part 3 of PAIA (section 10 of this Manual).
- 9.1.2** It is not enough that a record would be interesting or useful. The requester must identify the right concerned and explain why the record is required for its exercise or protection.

9.2 Making a request

- 9.2.1** A request must be made on Form 2 (Annexure B), or on a form that corresponds substantially with it, and addressed to the Information Officer at the address or email address in section 2 (section 53(1) of PAIA; regulation 7(1) of the PAIA Regulations).

9.2.2 The requester must (section 53(2)):

- (a) provide enough particulars to identify the record requested and the requester;
- (b) indicate the form of access required;
- (c) specify a postal address or fax number in the Republic, and may add an email address for correspondence;
- (d) identify the right the requester seeks to exercise or protect, and explain why the record is required for that purpose;
- (e) state any manner, in addition to a written reply, in which the requester wishes to be informed of the decision; and
- (f) if the request is made on behalf of another person, submit proof of the capacity in which it is made, to the reasonable satisfaction of the Information Officer.

9.2.3 Proof of identity must be attached to the request, as Form 2 requires.

9.2.4 **Assistance.** The Information Officer will assist any requester with a request. A requester who cannot complete Form 2 because of illiteracy or a disability may make the request orally; the Information Officer will then complete Form 2 on the requester's behalf and give the requester a copy (regulation 7(2) of the PAIA Regulations).

9.3 Fees

9.3.1 **Request fee.** On receipt of a request, the Information Officer will by notice require the requester to pay the prescribed request fee of R140.00 before the request is processed further (section 54(1) of PAIA). A data subject who wishes only to confirm whether Glensburg holds personal information about the data subject may do so free of charge (paragraph 8.2).

9.3.2 **Deposit.** If the search for and preparation of the record would require more than six hours, the requester will be required to pay a deposit of not more than one third of the access fee that would be payable if the request were granted (section 54(2); regulation 8(3)). If the request is refused, the deposit is repaid (section 54(4)).

9.3.3 **Access fee.** If the request is granted, the requester must pay the access fee for reproduction, for search and preparation beyond the first hour, and for postage or electronic transfer (section 54(6); Annexure A). Glensburg may withhold the record until the fees have been paid (section 54(5)).

9.3.4 A notice requiring payment of the request fee or a deposit will state that the requester may lodge a complaint with the Regulator, or an application with a court, against the tender or payment of the fee or deposit, and the procedure for doing so (section 54(3)).

9.3.5 Glensburg charges only the fees prescribed by the PAIA Regulations, together with VAT where it applies.

9.4 Decision and timeframes

9.4.1 The Information Officer will decide a request as soon as reasonably possible, and in any event within 30 days after it is received, and will notify the requester of the decision (section 56(1) of PAIA).

9.4.2 The period may be extended once, by not more than 30 days, on a ground listed in section 57(1): for example, where the request is for a large number of records or requires a search through a large number of records, where consultation within Glensburg or with another private body is needed and cannot reasonably be completed within 30 days, or where the requester consents in writing. Notice of the extension, with adequate reasons and the requester's right to lodge a complaint or an application against it, will be given within the original period (section 57(2)).

9.4.3 If no decision is given within the applicable period, the request is regarded as refused (section 58).

- 9.4.4** A notice granting a request states the access fee payable, the form in which access will be given, and the requester's right to lodge a complaint or an application against the fee or the form of access (section 56(2)). A notice refusing a request states adequate reasons, including the provisions of PAIA relied on, without referring to the content of the record, and the requester's right to lodge a complaint or an application against the refusal (section 56(3)).

9.5 Form and language of access

- 9.5.1** Access is given in the form the requester reasonably requires or, if no form is specified, in the form the Information Officer reasonably determines (section 60 of PAIA).
- 9.5.2** Records are provided in the language in which they are held, which is usually English.
- 9.5.3** Where part of a record may or must be refused, every part that can reasonably be severed from the refused part is disclosed (section 59).

9.6 Third parties

- 9.6.1** If Glensburg is considering a request for a record that might contain personal information of a third party, a third party's trade secrets or confidential commercial information, information supplied in confidence, or a third party's research information (sections 63(1), 64(1), 65 or 69(1) of PAIA), the Information Officer will take all reasonable steps to inform the third party of the request, by the fastest means reasonably possible and within 21 days of receiving it (section 71).
- 9.6.2** The third party may, within 21 days after being informed, make written or oral representations why the request should be refused, or give written consent to the disclosure (section 72).
- 9.6.3** The Information Officer will decide the request within 30 days after every third party has been informed (section 73(1)). If access is granted, it is given after 30 days from the notice to the third party, unless a complaint to the Regulator or an application to court is lodged within that period (section 73(4)).

9.7 Records that cannot be found or do not exist

- 9.7.1** If, after all reasonable steps have been taken, a record cannot be found or does not exist, the Information Officer will notify the requester by affidavit or affirmation, giving a full account of the steps taken. The notice is regarded as a decision to refuse the request. If the record is later found, access will be given unless a ground for refusal applies (section 55).

10 Grounds for refusal of access

PAIA ss 62–70

- 10.1** Glensburg may refuse access only on the grounds set out in Chapter 4 of Part 3 of PAIA. Where a ground is mandatory, Glensburg must refuse access; where it is discretionary, Glensburg may refuse access.

Ground	Section	Nature
Unreasonable disclosure of personal information about a third party who is a natural person, including a deceased individual, subject to the exceptions in section 63(2)	63	MANDATORY
Trade secrets of a third party; its financial, commercial, scientific or technical information whose disclosure would be likely to cause it harm; information supplied in confidence whose disclosure could reasonably be expected to disadvantage it in negotiations or prejudice it in commercial competition	64	MANDATORY

Ground	Section	Nature
Disclosure that would constitute an action for breach of a duty of confidence owed to a third party in terms of an agreement	65	MANDATORY
Disclosure that could reasonably be expected to endanger the life or physical safety of an individual	66(a)	MANDATORY
Disclosure likely to impair the security of a building, structure or system (including a computer or communication system), a means of transport or other property, or methods and procedures for protecting individuals, the public or property	66(b)	DISCRETIONARY
A record privileged from production in legal proceedings, unless the privilege has been waived	67	MANDATORY
Glensburg's trade secrets; its financial, commercial, scientific or technical information whose disclosure would be likely to cause it harm; information whose disclosure could reasonably be expected to disadvantage it in negotiations or prejudice it in commercial competition; a computer program it owns	68	DISCRETIONARY
Research being or to be carried out by or on behalf of a third party, where disclosure would be likely to expose the third party, the researcher or the subject matter of the research to serious disadvantage	69(1)	MANDATORY
Research being or to be carried out by or on behalf of Glensburg, including research of the Institute, where disclosure would be likely to expose Glensburg, the researcher or the subject matter of the research to serious disadvantage	69(2)	DISCRETIONARY

10.2 Public interest override. Despite these grounds, Glensburg must grant access to a record if its disclosure would reveal evidence of a substantial contravention of, or failure to comply with, the law, or of an imminent and serious public safety or environmental risk, and the public interest in its disclosure clearly outweighs the harm contemplated by the ground concerned (section 70).

10.3 A request will not succeed where the requester does not show that the record is required for the exercise or protection of a right, or does not comply with the procedural requirements of PAIA (section 50(1)).

11 Remedies

PAIA Part 4 · POPIA s 74

- 11.1 No internal appeal.** PAIA provides for an internal appeal only against a decision of the information officer of certain public bodies. No internal appeal lies against a decision of Glensburg.
- 11.2 Complaint to the Information Regulator.** A requester aggrieved by a decision of Glensburg to refuse a request, or by a decision on fees (section 54), on an extension of time (section 57(1)) or on the form of access (section 60), may lodge a complaint with the Regulator within 180 days of the decision (section 77A(2)(d)). A third party aggrieved by a decision in relation to a request may do the same (section 77A(3)(c)). A request that has not been decided within the applicable period is regarded as refused (section 58). A complaint is lodged on PAIA Form 5, available from the Regulator (regulation 10 of the PAIA Regulations); a complaint lodged after 180 days requires an application for condonation.
- 11.3 Application to court.** A requester or third party may apply to court for appropriate relief within 180 days, after exhausting the complaints procedure provided for in section 77A (sections 78(1), 78(2)(d) and 78(3)(c)).
- 11.4 Personal information.** Complaints about the processing of personal information are dealt with in paragraph 8.6.

INFORMATION REGULATOR (SOUTH AFRICA)

Contact details**PHYSICAL ADDRESS**

Woodmead North Office Park, 54 Maxwell Drive,
Woodmead, Johannesburg, 2191

TELEPHONE

010 023 5200 · toll-free 0800 017 160

PAIA COMPLAINTS

PAIAComplaints@inforegulator.org.za

GENERAL ENQUIRIES

enquiries@inforegulator.org.za

POSTAL ADDRESS

P.O. Box 31533, Braamfontein, Johannesburg, 2017

WEBSITE

inforegulator.org.za

POPIA COMPLAINTS

POPIAComplaints@inforegulator.org.za

Correct at the date of this Manual. Confirm current details and forms on the Regulator's website before lodging a complaint.

12 Availability of this Manual

PAIA s 51(3)

12.1 This Manual is available:

- (a) on Glensburg's website, glensburg.co.za;
- (b) at Glensburg's office, 35 Fricker Road, Illovo, Johannesburg, for public inspection during normal business hours;
- (c) to any person on request: by email free of charge, or in printed form on payment of the reproduction fee of R2.00 per A4 page (Annexure A, item 2); and
- (d) to the Information Regulator on request.

12.2 This Manual is published in English.

13 Updating of this Manual

PAIA s 51(2)

- 13.1** The head of Glensburg updates this Manual on a regular basis. It is reviewed at least once a year, and whenever there is a material change in the law, in the categories of records Glensburg holds or in its processing of personal information. The version number and effective date on the cover identify each version; the version published on Glensburg's website is the current one.

13.2 Version history:

Version	Date	Summary of changes
1.0	21 January 2026	First issue.
2.0	22 September 2026	Full revision. Contact details updated. Aligned with the PAIA Regulations, 2021 and the POPIA Regulations as amended with effect from 17 April 2025. Fees, timeframes, grounds of refusal and remedies restated for a private body. Third-party procedure, research-information protection and data subject rights added. Prescribed forms replaced with current versions.

14 Approval

PAIA s 51

- 14.1

This Manual is approved by the head of Glensburg (Pty) Ltd in terms of section 51 of PAIA and takes effect on 22 September 2026. It supersedes Version 1.0 of 21 January 2026.
- 14.2

The signed original of this Manual is held on record by Glensburg.

APPROVAL

APPROVED BY

The Director, as head of the private body

ENTITY

Glensburg (Pty) Ltd · Reg. No. 2023/764252/07

SIGNED AT

Illovo, Johannesburg

DATE OF SIGNATURE

22 September 2026

EFFECTIVE DATE

22 September 2026

ANNEXURE A

Prescribed fees for private bodies

Annexure B to the Regulations relating to the Promotion of Access to Information, 2021 (GN R757 of 27 August 2021)

Item	Description	Amount
1	The request fee payable by every requester	R140.00
2	Photocopy of A4-size page	R2.00 per page or part thereof
3	Printed copy of A4-size page	R2.00 per page or part thereof
4	For a copy in a computer-readable form on:	
	(i) flash drive (to be provided by the requester)	R40.00
	(ii) compact disc, if provided by the requester	R40.00
	compact disc, if provided to the requester	R60.00
5	For a transcription of visual images, per A4-size page	Outsourced; at the service provider's quotation
6	Copy of visual images	Outsourced; at the service provider's quotation
7	Transcription of an audio record, per A4-size page	R24.00
8	Copy of an audio record on:	
	(i) flash drive (to be provided by the requester)	R40.00
	(ii) compact disc, if provided by the requester	R40.00
	compact disc, if provided to the requester	R60.00
9	To search for and prepare the record for disclosure, for each hour or part of an hour, excluding the first hour, reasonably required for such search and preparation	R145.00
	Not to exceed a total cost of	R435.00
10	Deposit, if the search exceeds six hours	One third of the amount per request, calculated in terms of items 2 to 8
11	Postage, email or any other electronic transfer	Actual expense, if any

NOTES

1. The request fee is payable before a request is processed further (section 54(1) of PAIA). Confirming whether Glensburg holds personal information about a data subject is free (section 23(1)(a) of POPIA).
2. The first hour of search and preparation is free, and the search and preparation fee is capped at R435.00 per request.
3. A deposit may not exceed one third of the access fee that would be payable if the request were granted (section 54(2)), and is repaid if the request is refused (section 54(4)).
4. Glensburg will notify the requester of its decision and of the fees payable, with payment details, on a form corresponding substantially with Form 3 of the PAIA Regulations (regulation 8). VAT is added where it applies.
5. If the prescribed fees are amended, the amended fees apply from their effective date.

ANNEXURE B

Form 2: Request for access to record

Regulation 7 of the PAIA Regulations. Fillable: complete it in a PDF reader, or print and complete by hand.

NOTE: 1. Proof of identity must be attached by the requester. 2. If a request is made on behalf of another person, proof of such authorisation must be attached to this form.

To	The Information Officer, Glensburg (Pty) Ltd
Address	35 Fricker Road, Illovo, Johannesburg, 2196
E-mail address	planning@gensburg.co.za
Fax number	Not in use

MARK WITH AN "X"☐

Request is made in my own name

☐

Request is made on behalf of another person

PERSONAL INFORMATION

Full names			
Identity number			
Capacity in which request is made (when made on behalf of another person)			
Postal address			
Street address			
E-mail address			
Contact numbers	Tel. (B)	Facsimile	Cellular
Full names of person on whose behalf request is made (if applicable)			
Identity number			
Postal address			
Street address			
E-mail address			
Contact numbers	Tel. (B)	Facsimile	Cellular

PARTICULARS OF RECORD REQUESTED

Provide full particulars of the record to which access is requested, including the reference number if that is known to you, to enable the record to be located. (If the provided space is inadequate, please continue on a separate page and attach it to this form. All additional pages must be signed.)

Description of record or relevant part of the record	
Reference number, if available	
Any further particulars of record	

TYPE OF RECORD (mark the applicable box with an "X")

☐	Record is in written or printed form
☐	Record comprises virtual images (this includes photographs, slides, video recordings, computer-generated images, sketches, etc)
☐	Record consists of recorded words or information which can be reproduced in sound
☐	Record is held on a computer or in an electronic, or machine-readable form

FORM OF ACCESS (mark the applicable box with an "X")

☐	Printed copy of record (including copies of any virtual images, transcriptions and information held on computer or in an electronic or machine-readable form)
☐	Written or printed transcription of virtual images (this includes photographs, slides, video recordings, computer-generated images, sketches, etc)
☐	Transcription of soundtrack (written or printed document)
☐	Copy of record on flash drive (including virtual images and soundtracks)
☐	Copy of record on compact disc drive (including virtual images and soundtracks)
☐	Copy of record saved on cloud storage server

MANNER OF ACCESS (mark the applicable box with an "X")

- ☐ Personal inspection of record at registered address of public/private body (including listening to recorded words, information which can be reproduced in sound, or information held on computer or in an electronic or machine-readable form)
- ☐ Postal services to postal address
- ☐ Postal services to street address
- ☐ Courier service to street address
- ☐ Facsimile of information in written or printed format (including transcriptions)
- ☐ E-mail of information (including soundtracks if possible)
- ☐ Cloud share/file transfer

Preferred language

Note that if the record is not available in the language you prefer, access may be granted in the language in which the record is available.

PARTICULARS OF RIGHT TO BE EXERCISED OR PROTECTED

If the provided space is inadequate, please continue on a separate page and attach it to this form. The requester must sign all the additional pages.

Indicate which right is to be exercised or protected

Explain why the record requested is required for the exercise or protection of the aforementioned right

FEES

- a) A request fee must be paid before the request will be considered.
- b) You will be notified of the amount of the access fee to be paid.
- c) The fee payable for access to a record depends on the form in which access is required and the reasonable time required to search for and prepare a record.
- d) If you qualify for exemption of the payment of any fee, please state the reason for exemption.

Reason

You will be notified in writing whether your request has been approved or denied and, if approved, of the costs relating to your request, if any. Please indicate your preferred manner of correspondence:

☐	Postal address
☐	Facsimile
☐	Electronic communication (please specify below)
Electronic communication (specify)	

Signed at _____ this _____ day of _____ 20 _____

Signature of requester / person on whose behalf request is made

FOR OFFICIAL USE

Reference number	
Request received by (state rank, name and surname of Information Officer)	
Date received	
Request fee	
Access fees	
Deposit (if any)	
Signature of Information Officer	

ANNEXURE C

Form 1: Request for a copy of the Guide

Request to an information officer for a copy of the Guide on how to use PAIA. Regulation 3 of the PAIA Regulations.
No fee is payable.

To	The Information Officer, Glensburg (Pty) Ltd 35 Fricker Road, Illovo, Johannesburg, 2196 · planning@glenzburg.co.za
I, full names	

IN MY CAPACITY AS (mark with an "X")

☐ Information officer ☐ Other

Name of public/private body (if applicable)		
Postal address		
Street address		
E-mail address		
Facsimile		
Contact numbers	Tel. (B)	Cellular

HEREBY REQUEST THE FOLLOWING COPY(IES) OF THE GUIDE

Language (mark with "X")	No. of copies	Language (mark with "X")	No. of copies
☐ Sepedi		☐ Sesotho	
☐ Setswana		☐ siSwati	
☐ Tshivenda		☐ Xitsonga	
☐ Afrikaans		☐ English	
☐ isiNdebele		☐ isiXhosa	
☐ isiZulu			

MANNER OF COLLECTION (mark with an "X")

☐ Personal collection ☐ Postal address
☐ Facsimile ☐ Electronic communication (please specify below)

Electronic communication (specify)	
------------------------------------	--

Signed at _____ this _____ day of _____ 20 _____

Signature of requester

ANNEXURE D

POPIA Form 1: Objection to the processing of personal information

In terms of section 11(3) of the Protection of Personal Information Act 4 of 2013. Regulation 2 of the POPIA Regulations, as amended. Free of charge.

NOTE: 1. Affidavits or other documentary evidence in support of the objection may be attached. 2. If the space provided for in this form is inadequate, submit information as an annexure to this form and sign each page. 3. No fee is payable. You may submit this form by hand, post, email, WhatsApp or telephone (see paragraph 8.3 of the Manual).

Reference number	For office use
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A DETAILS OF DATA SUBJECT	
Name(s) and surname / registered name of data subject	
Identity number / registration number	
Residential, postal or business address	
Code	
Contact number(s)	
Fax number / e-mail address	

B DETAILS OF RESPONSIBLE PARTY	
Name of responsible party	Glensburg (Pty) Ltd
Business address	35 Fricker Road, Illovo, Johannesburg
Code	2196
Contact number(s)	+27 10 442 5522 · WhatsApp +27 79 375 2704
Fax number / E-mail address	planning@glensburg.co.za

C REASONS FOR OBJECTION IN TERMS OF SECTION 11(3)(a)

Please provide detailed reasons for the objection.

Reasons	
----------------	--

D OBJECTION TO DIRECT MARKETING IN TERMS OF SECTION 11(3)(b)

☐ I object to the processing of my personal information for purposes of direct marketing.

Signed at _____ this _____ day of _____ 20 _____

Signature of data subject / designated person

ANNEXURE E

POPIA Form 2: Request for correction or deletion of personal information, or destruction or deletion of a record

In terms of section 24(1) of the Protection of Personal Information Act 4 of 2013, Regulation 3 of the POPIA Regulations, as amended. Free of charge.

NOTE: 1. Affidavits or other documentary evidence in support of the request may be attached. 2. If the space provided for in this form is inadequate, submit information as an annexure to this form and sign each page. 3. No fee is payable. Glensburg will notify you of the action taken within 30 days of receiving your request.

Reference number	For office use
------------------	----------------

REQUEST FOR (mark the appropriate box with an "X")

- ☐ Correction or deletion of the personal information about the data subject which is in possession or under the control of the responsible party.
- ☐ Destroying or deletion of a record of personal information about the data subject which is in possession or under the control of the responsible party and who is no longer authorised to retain the record of information.

A DETAILS OF THE DATA SUBJECT

Surname	
Full names	
Identity number	
Residential, postal or business address	
Code	
Contact number(s)	
Fax number / e-mail address	

B DETAILS OF RESPONSIBLE PARTY

Name of responsible party	Glensburg (Pty) Ltd
Business address	35 Fricker Road, Illovo, Johannesburg
Code	2196
Contact number(s)	+27 10 442 5522 · WhatsApp +27 79 375 2704
Fax number / E-mail address	planning@glensburg.co.za

C REASONS FOR THE REQUEST (mark all that apply)	
☐	The personal information is inaccurate
☐	The personal information is irrelevant
☐	The personal information is excessive
☐	The personal information is out of date
☐	The personal information is incomplete
☐	The personal information is misleading
☐	The personal information was obtained unlawfully
☐	The responsible party is no longer authorised to retain the record (section 14)

Please provide a detailed explanation for the reasons selected.

Explanation

Signed at _____ this _____ day of _____ 20 _____

Signature of data subject / designated person

GLENSBURG

TOWN PLANNERS

Glensburg (Pty) Ltd

35 Fricker Road, Illovo, Johannesburg, 2196

+27 10 442 5522 · planning@glensburg.co.za · glensburg.co.za

Published in terms of section 51 of the Promotion of Access to Information Act 2 of 2000. Version 2.0, effective 22 September 2026. The current version of this Manual is the one published at glensburg.co.za.