



GAP MANAGEMENT

Protection Of Personal Information Policy

In Terms Of Protection of Personal Information Bill (2009)

1. INTRODUCTION

Despite the Protection Of Personal Information Bill not being in effect as an act GAP Management prefers compliance thereto in further support of relevant legislation and internal policies.

The aim hereof is to ensure that every possible effort is made to:

- a. limit access to information only to authorised parties
- b. apply information only in compliance with legislation

2. DEFINITIONS

- a. "POPIA" refers to Protection Of Personal Information Bill (2009).
- b. "PAIA" refers to the Promotion Of Access To Information Act 2 Of 2000.
- c. "IST Policy" refers to GAP Management's IST User Operating Policy.
- d. "COC" refers to GAP Management's Code Of Conduct.
- e. "Party" and, or, "parties" refers to all entities in relationship with GAP Management and includes, but is not limited to, GAP Management, its personnel and its customers.



3. COMPANY INFORMATION

GAP Management renders full life cycle property management products and services to a variety of customers. GAP Management's contact details and those of its appointed officials are as follow:

- a. Name: GAP Management
- b. Address: 96 Third Avenue, Newton Park, Port Elizabeth
- c. Telephone Number: 041 364 1986
- d. Fax Number: 041 264 0435
- e. E-Mail Address: info@gapmanagement.co.za
- f. Web Address: www.gapmanagement.co.za

4. INFORMATION OFFICER

All enquiries relating to this document must be address in writing to GAP Management's Information Officer whose contact detail is as follow:

- a. Name: Andre Ollphent
- b. Designation: Chief Executive Officer
- c. Address: 96 Third Avenue, Newton Park, Port Elizabeth
- d. Telephone Number: 041 364 1986
- e. Fax Number: 041 264 0435
- f. E-Mail Address: andre@gapmanagement.co.za

96 THIRD AVE | NEWTON PARK | PORT ELIZABETH | 6000
(041) 3641 986 | info@gapmanagement.co.za | (041) 3640 435
UNIT 9 | NORMA JEAN SQUARE | 244 JEAN AVENUE | CENTURION
T: (012) 664 1156 | F: (012) 664 0802

VAT NO: 4780212165 | REG. NO: 2003/005674/07



5. INFORMATION HELD

- a. The information held by GAP Management is defined in its PAIA manual.
- b. A copy of GAP Management's PAIA manual can be obtained from its web site and, or, from its Information Officer.

6. PARTIES PRIVIED TO ACCESS INFORMATION

- a. Even though GAP Management commits to the relevant legislation it still, without prejudice, retains the sole right to grant or deny access to its information.
- b. As GAP Managements holds information relating to various parties GAP Management also uphold each party's relevant rights in terms of each party's internal governance and national as well as international legislation.
- c. In the event that information relates to other parties the relevant party retains the rights to allow and, or, decline access to its information.

7. PROTECTION OF INFORMATION

GAP Management commits to every possible effort to limit access to the information it holds. At present information access controls includes, but is not limited to:

- a. Managed physical access to information storage devices and systems.
- b. Managed electronic access to information storage devices and systems.
- c. Managed retention of information storage devices and systems.
- d. Managed information encryption.



- e. Managed governance relating to information as constituted by national legislation as well as GAP Management's IST Policy, COC, PAIA and POPIA.

8. POLICY MAINTENANCE

GAP Management reserves the right to adjust this policy document inclusive of all other governance relating hereto from time to time and as allowed by South African legislation.

In terms of the above note the change schedule of this document as follow:

DATE	DESCRIPTION
2012-01-13	Draft policy published for approval by Directors and Auditors.
2012-01-31	Policy implementation.