

URBAN PROPERTY MANAGEMENT

trading as Urban Property Services

"Building a Legacy. Together."

PRIVACY POLICY

and

MANUAL IN TERMS OF SECTION 51 OF THE PROMOTION OF ACCESS TO INFORMATION ACT 2 OF 2000 ("PAIA")

Prepared with reference to the Protection of Personal Information Act 4 of 2013 ("POPIA")

Applicable to: www.urbanpm.co.za

Version 1.0 — Effective Date: 28 March 2025 — Last Reviewed: 10 July 2026

1. Definitions and Interpretation

In this document, unless the context indicates otherwise:

- “Body Corporate” means the body corporate of a sectional title scheme established under the Sectional Titles Schemes Management Act 8 of 2011 (“STSMA”);
- “CSOS” means the Community Schemes Ombud Service, established under the Community Schemes Ombud Service Act 9 of 2011;
- “HOA” means a homeowners’ association;
- “Information Officer” means the person designated by UPM in terms of section 55 of POPIA and section 51 of PAIA, being the head of UPM or that person’s duly appointed deputy;
- “Information Regulator” means the Information Regulator established under section 39 of POPIA;
- “PAIA” means the Promotion of Access to Information Act 2 of 2000, as amended, and its Regulations;
- “Personal Information” bears the meaning given to it in section 1 of POPIA, and includes information relating to an identifiable, living natural person and, where applicable, an identifiable, existing juristic person;
- “POPIA” means the Protection of Personal Information Act 4 of 2013, as amended, and its Regulations;
- “Processing” bears the meaning given to it in section 1 of POPIA and includes collection, receipt, recording, organisation, collation, storage, updating, retrieval, use, dissemination and destruction of information;
- “Record” bears the meaning given to it in section 1 of PAIA;
- “Requester” bears the meaning given to it in section 1 of PAIA;
- “UPM”, “we”, “us” or “our” means Urban Property Management, trading as Urban Property Services, the private body and responsible party to which this document applies;
- “User”, “you” or “your” means any natural or juristic person who visits or uses the UPM website, or whose personal information UPM otherwise processes, including owners, trustees, tenants, prospective clients, suppliers and job applicants.

PART A — PRIVACY POLICY

2. Introduction

Urban Property Management (“UPM”, trading as Urban Property Services) provides sectional title, body corporate and homeowners’ association management services in Pretoria and the greater Gauteng region. UPM is accredited with the Property Practitioners Regulatory Authority (PPRA), the National Association of Managing Agents (NAMA), and is registered with the Council for Debt Collectors.

UPM is committed to protecting the privacy and Personal Information of everyone we deal with, including the visitors to our website, our clients (bodies corporate, HOAs, trustees and owners), tenants, suppliers, job applicants and business contacts. This Privacy Policy explains what Personal Information we collect, why we collect it, how we use and protect it, and what rights you have under POPIA.

This Privacy Policy applies to www.urbanpm.co.za and to the Personal Information UPM collects through that website, by telephone, email, WhatsApp, in person and through our management of community schemes.

3. Who is Responsible for Your Information

UPM is the “responsible party” as defined in POPIA in respect of the Personal Information described in this Policy. Our contact and Information Officer details are:

Entity name	Urban Property Management (trading as Urban Property Services)
Company registration number	2020/801022/07 (Private Company)
Physical address	Pegasus Building 1, 210 Amarand Avenue, Menlyn Maine, Pretoria, 0181
Telephone	012 004 3322
WhatsApp	063 860 4850
Website	www.urbanpm.co.za
Information Officer	Jan Paul Smit (Managing Director), appointed 1 May 2022
Deputy Information Officer	Gerda Muller (General Manager)
Information Officer email	info@urbanpm.co.za
Information Regulator registration	Registration No. 2025-002012, registered 28 March 2025

4. The Personal Information We Collect

Depending on how you interact with UPM, we may collect:

4.1 Website visitors

- Contact details submitted through forms (e.g. the “Get a Quote” form), such as name, email address, telephone number, scheme or complex name, and message content;
- Technical information such as IP address, browser type, device type, and pages visited, collected automatically through cookies and similar technologies (see clause 10 below);

4.2 Owners, trustees and residents of managed schemes

- Identity details (name, ID or passport number, contact details, postal and physical address);
- Section or property ownership details, participation quota, levy and financial account information, banking details for levy collection and payments;

- Correspondence, complaints, meeting minutes, conduct rule breaches, and CSOS or legal matters relating to the scheme;
- In limited circumstances, information relevant to debt collection processes, in compliance with the National Credit Act and Council for Debt Collectors requirements.

4.3 Prospective clients and business contacts

- Name, role, organisation, contact details, and the content of enquiries or proposals exchanged with UPM.

4.4 Job applicants

- Curriculum vitae details, qualifications, employment history, references, and any information submitted through UPM's recruitment forms.

UPM does not intentionally collect special personal information (as defined in POPIA, e.g. health, religious or political information, or criminal behaviour) or information relating to children, except where this is strictly necessary for a legitimate purpose (for example, a debt collection or CSOS-related process) and then only in compliance with POPIA.

5. How We Collect Your Information

- Directly from you — when you complete a form on our website, call, WhatsApp, or email us, sign a management agreement, or attend an AGM/SGM;
- From the body corporate or HOA that appoints us, or from a previous managing agent, when we take over management of a scheme;
- From publicly available sources, such as the Deeds Office, where necessary to confirm ownership;
- Automatically through our website, via cookies and analytics tools (see clause 10).

6. Why We Process Your Information

UPM processes Personal Information for the following purposes:

- To respond to enquiries and quote requests submitted through urbanpm.co.za;
- To perform our managing agent duties under the STSMA, the Sectional Titles Act 95 of 1986, and applicable HOA constitutions, including levy administration, financial reporting, arrears collection, AGM/SGM administration, and maintenance coordination;
- To communicate with owners, trustees and residents about scheme matters;
- To comply with legal obligations, including those arising from CSOS proceedings, the National Credit Act, tax legislation, and PPRA/NAMA regulatory requirements;
- To manage supplier and contractor relationships;
- To assess job applications;
- To improve our website and marketing, and, where you have consented, to send you newsletters or marketing communications;
- For security, fraud prevention, and to protect the legitimate interests of UPM, our clients, and other data subjects.

7. Legal Basis for Processing

UPM only processes Personal Information where at least one of the following grounds under section 11 of POPIA applies: you have consented to the processing; the processing is necessary to perform a contract to which you are a party (e.g. a management agreement); the processing is required to comply with a legal obligation; the processing protects a legitimate interest of yours; or the processing is necessary to pursue the legitimate

interests of UPM or a third party to whom the information is supplied, provided this is not overridden by your interests.

8. Sharing and Disclosure of Information

UPM does not sell Personal Information. We may share Personal Information, on a need-to-know basis, with:

- Trustees and directors of the relevant body corporate or HOA, to the extent necessary for scheme governance;
- CSOS, in connection with a dispute, conciliation or adjudication;
- Attorneys, debt collectors, auditors, and other professional advisors engaged in connection with scheme administration;
- Banks and payment processors, for levy collection and payment purposes;
- Contractors and service providers engaged to maintain common property, strictly to the extent required to perform the relevant work;
- Regulatory bodies, including the PPRA, NAMA, the Council for Debt Collectors, and the Information Regulator, where legally required;
- Service providers who support UPM's IT systems, website hosting, and communication platforms (including WeConnectU), under written confidentiality and processing terms;
- Any party where disclosure is required by law or court order.

Where UPM engages a third party to process Personal Information on its behalf (an "operator" under POPIA), we require that party to process the information only for the agreed purpose, to maintain confidentiality, and to implement appropriate security safeguards.

9. Cross-Border Transfers

Some of the service providers referred to in clause 8 (for example, cloud hosting, email, or analytics providers) may store or process information outside South Africa. Where this occurs, UPM will only transfer Personal Information to a foreign country where the recipient is subject to a law, binding agreement, or other arrangement that provides an adequate level of protection substantially similar to POPIA, or where you have consented to the transfer, or another basis under section 72 of POPIA applies.

10. Cookies and Website Analytics

The UPM website may use cookies and similar technologies to remember your preferences, understand how visitors use the site, and improve our services. You can disable cookies through your browser settings, although this may affect the functionality of certain parts of the website. We do not use cookies to make automated decisions that produce legal or similarly significant effects concerning you.

11. Direct Marketing

In accordance with section 69 of POPIA, UPM will only send you direct marketing communications (such as newsletters or promotional content) if you are an existing client and the marketing relates to similar products or services, or if you have given your consent. You may opt out of direct marketing communications at any time by contacting us using the details in clause 3, or by using the "unsubscribe" option in any marketing email.

12. Data Retention

UPM retains Personal Information only for as long as necessary to fulfil the purposes described in this Policy, or as required by law. Scheme-related financial and governance records are generally retained for the periods required under the STSMA, the Companies Act, and tax legislation. Website enquiry information that does not result in an ongoing relationship is retained for a limited period and then securely deleted or anonymised.

13. Security Safeguards

UPM takes reasonable technical and organisational measures to protect Personal Information against loss, unauthorised access, interference, modification, or disclosure, including access controls, secure storage of physical and electronic records, and confidentiality obligations imposed on staff and operators. No system is completely secure, and UPM cannot guarantee absolute security; however, we take these obligations seriously and will notify the Information Regulator and affected data subjects of any security compromise as required under section 22 of POPIA.

14. Your Rights as a Data Subject

Subject to POPIA, you have the right to:

- Be notified that your Personal Information is being collected, and for what purpose;
- Access the Personal Information UPM holds about you;
- Request correction, updating or deletion of your Personal Information where it is inaccurate, irrelevant, excessive, out of date, incomplete or misleading, or where UPM is no longer authorised to retain it;
- Object, on reasonable grounds, to the processing of your Personal Information;
- Withdraw consent to processing where the processing is based on consent, without affecting the lawfulness of processing carried out before withdrawal;
- Not be subject to a decision based solely on automated processing that affects you significantly, without an opportunity to make representations;
- Submit a complaint to the Information Regulator regarding alleged interference with your protected Personal Information;
- Institute civil proceedings regarding alleged non-compliance with POPIA.

To exercise any of these rights, please contact our Information Officer using the details in clause 3. We may need to verify your identity before giving effect to your request.

15. Complaints to the Information Regulator

If you are not satisfied with how UPM has handled your Personal Information, you may lodge a complaint with the Information Regulator of South Africa:

Physical address	27 Stiemens Street, Braamfontein, Johannesburg, 2001
Postal address	P.O. Box 31533, Braamfontein, 2017
Email	enquiries@inforegulator.org.za / complaints.IR@justice.gov.za
Website	www.inforegulator.org.za

16. Changes to This Privacy Policy

UPM may update this Privacy Policy from time to time to reflect changes in our processing activities or legal requirements. The current version will always be available on our website, with the “last reviewed” date shown on the cover page.

PART B — MANUAL IN TERMS OF SECTION 51 OF PAIA

17. Purpose of This Manual

Section 51 of PAIA requires every private body to compile and make available a manual to assist members of the public to understand what records UPM holds, and how to request access to those records in order to exercise or protect a right. This Manual also incorporates the information required under section 51(1)(a)–(d), as amended, and aligns with section 17 of POPIA, which requires a responsible party to document its processing operations.

This Manual should be read together with Part A (the Privacy Policy) above, which explains in more detail how and why UPM processes Personal Information.

18. Head of the Private Body and Contact Details

Head of the private body	Jan Paul Smit, Managing Director, Urban Property Management
Information Officer	Jan Paul Smit — registered with the Information Regulator, No. 2025-002012 (28 March 2025)
Postal / physical address	Pegasus Building 1, 210 Amarand Avenue, Menlyn Maine, Pretoria, 0181
Telephone	012 004 3322
WhatsApp	063 860 4850
Email	info@urbanpm.co.za
Website	www.urbanpm.co.za

19. Guide on How to Use PAIA

The Information Regulator has, in terms of section 10 of PAIA, published a guide containing information to assist any person wishing to exercise a right in terms of PAIA or POPIA, including the objectives of both Acts, the postal and street address, phone and fax number of the Information Regulator, and how to make requests, in each official language. This guide is available from the Information Regulator at www.inforegulator.org.za, or by contacting the Information Regulator using the details in clause 15 above.

20. Records Automatically Available Without a Request

The following categories of records are voluntarily made available by UPM without the need for a formal PAIA request, for example on our website or on request from our office:

- This Privacy Policy and PAIA Manual;
- General company and services information, including our accreditations (PPRA, NAMA, Council for Debt Collectors);
- General contact details and office location;
- Published marketing and educational content (articles, social media content, brochures).

21. Categories of Records Held by UPM

In accordance with section 51(1)(e) of PAIA, UPM holds records falling broadly within the following categories, some of which are available on request and some of which may be subject to grounds for refusal under Chapter 4 of PAIA:

21.1 Corporate and compliance records

- Company registration and regulatory accreditation records (PPRA, NAMA, Council for Debt Collectors);

- Internal policies, including this Privacy Policy and PAIA Manual, and POPIA compliance documentation.

21.2 Client and scheme records

- Management agreements with bodies corporate and HOAs;
- Financial records, including levy rolls, arrears reports, budgets, financial statements, and reserve fund records;
- AGM/SGM notices, agendas and minutes;
- Conduct rules, correspondence, and maintenance records;
- CSOS and legal correspondence relating to managed schemes.

21.3 Personal information of data subjects

- Owner, trustee and resident contact and identity information;
- Supplier and contractor records;
- Employee and job applicant records;
- Website enquiry and marketing consent records.

21.4 Financial and operational records

- Banking and levy collection records;
- Invoices, contracts and procurement records;
- Insurance records relating to managed schemes.

Note: Some of the above records belong to the relevant body corporate or HOA rather than to UPM itself, and requests for scheme-specific records (e.g. an individual owner's financial statement) may need to be directed to, or confirmed with, the relevant body corporate or HOA trustees.

22. Records Available in Terms of Other Legislation

Certain records referred to above are also governed by other legislation, including the Sectional Titles Schemes Management Act 8 of 2011, the Sectional Titles Act 95 of 1986, the Community Schemes Ombud Service Act 9 of 2011, the Companies Act 71 of 2008, the National Credit Act 34 of 2005, and tax legislation administered by SARS. Where such legislation provides its own access procedure, a requester may be directed to follow that procedure instead of, or in addition to, PAIA.

23. How to Request Access to a Record (Section 53 Procedure)

A requester who wishes to obtain access to a record held by UPM must comply with the following procedure:

1. Complete the prescribed request form (Form 2 to the PAIA Regulations, available from the Information Regulator's website), providing sufficient detail to enable the record to be identified.
2. Specify the form of access required (for example, a copy of the record or an inspection).
3. Provide proof of identity of the requester and, where applicable, proof of authority if requesting on behalf of another person.
4. Submit the completed form to the Information Officer at the contact details in clause 18, together with any prescribed request fee.
5. UPM will respond within 30 days of receipt of the request, as required by section 56 of PAIA (or notify the requester of an extension where permitted).
6. If access is granted, UPM will notify the requester of the applicable access fee (if any) before providing the record.
7. If access is refused, UPM will provide adequate reasons for the refusal, with reference to the relevant provision of PAIA.

24. Fees

PAIA permits a private body to charge a request fee for a request for access to a record (other than a record containing the requester's own personal information), and an access fee for reproduction and search/preparation time, calculated in accordance with the fee schedule prescribed under PAIA. The current prescribed fees are published by the Information Regulator and the Department of Justice and Constitutional Development, and will be confirmed to a requester in writing before any fee becomes payable. No fee is charged for a request for a requester's own personal information, save for the actual cost of reproduction, where applicable.

25. Grounds for Refusal of Access

UPM may refuse a request for access to a record where a ground for refusal set out in Chapter 4 of Part 3 of PAIA applies, which may include (without limitation): protection of the privacy of a third party who is a natural person, including a deceased person; protection of certain confidential information of a third party; protection of commercial information of UPM or a third party; protection of legally privileged information; and safety of individuals and protection of property. Where a request is refused, in whole or in part, UPM will provide the requester with adequate reasons, including the relevant provision of PAIA relied upon.

26. POPIA-Related Requests

Where a request relates to a data subject's own Personal Information held by UPM, the data subject may make that request either under PAIA or by contacting UPM's Information Officer directly under clause 14 of the Privacy Policy above (Part A), which provides a simpler route for individuals seeking access to, or correction of, their own information.

27. Remedies Available to a Requester

A requester who is dissatisfied with a decision of UPM under PAIA may lodge a complaint with the Information Regulator (see clause 15 above) or apply to a court for appropriate relief, in accordance with Part 5 of PAIA.

28. Availability of This Manual

This Manual is available on the UPM website at www.urbanpm.co.za, and a copy may be inspected, free of charge, at UPM's principal place of business during normal business hours, or obtained from the Information Officer on request, subject to a reasonable reproduction fee where applicable.

29. Updates to This Manual

UPM will update this Manual on a regular basis, and whenever there is a material change to the categories of records it holds, its processing activities, or applicable legislation.