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**BONDEED (Pty) Ltd**

Prepared in accordance with the Promotion of Access to Information Act, 2000 ("PAIA") and the Protection of Personal Information Act, 2013 ("POPIA")

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**1. Introduction & Purpose of Manual**

This manual has been compiled in accordance with PAIA and POPIA to:

- Assist any person wishing to request access to records held by BONDEED (Pty) Ltd ("BONDEED").
  - Ensure that data subjects are aware of their rights under POPIA, including the right to access and correct personal information.
  - Promote transparency while safeguarding personal information in line with our legal obligations.
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**2. Contact Details of Information Officer**

**Information Officer:** Ruan Greeff

**Position:** Managing Director

**Email:** ruan@bondeed.co.za

**Telephone:** 021 007 0800

**Physical Address:** Available upon request

**Postal Address:** Available upon request

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**3. Description of Business**

BONDEED is a bond origination company that assists clients in sourcing mortgage finance ("bonds") from major banks in South Africa. We act as an intermediary between clients and banks, streamlining the home loan application process, offering advice, pre-approval services, and supporting both buyers and estate agents throughout the property finance process.

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**4. Automatically Available Records**

BONDEED does not make any personal information automatically available without a formal request.

Any publicly accessible information is limited to:

- General information on our website (service descriptions, contact information).  
All other information is securely stored and only released upon formal request in terms of PAIA or POPIA.
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**5. Categories of Records Held by BONDEED**

The following categories of records are held and may be subject to a formal access request:

**5.1 Client Records**

- Bond application forms and supporting documentation (e.g., identity documents, proof of income, bank statements).
- Correspondence with clients (emails, letters, call logs).
- Pre-approval reports and affordability assessments.
- Signed consent forms.

**5.2 Financial Records**

- Invoices and payment records.
- Bank account records relating to transactions with clients or service providers.

**5.3 Operational & Administrative Records**

- Contracts and agreements with service providers and partners.
- Internal policies and procedures.
- Meeting notes relevant to service delivery.

#### 5.4 Human Resources Records

- Employee contracts and personal files.
- Payroll and leave records.

#### 5.5 Marketing Records

- Marketing campaign information.
- Records of consent for marketing communication.

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### 6. Grounds for Refusal of Access

In terms of PAIA, BONDEED may refuse access to a record if:

- The record contains personal information of a third party.
- Disclosure would reveal trade secrets, confidential commercial information, or financial information of BONDEED or a third party.
- Disclosure could reasonably be expected to endanger the life or physical safety of an individual.
- The record is subject to legal privilege.
- Disclosure would contravene legislation or a court order.

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### 7. Request Procedure

To request access to a record:

1. Complete the prescribed PAIA/POPIA request form (Form C for private bodies).
2. Submit the form to the Information Officer via email or post, with adequate proof of identity.
3. Indicate whether the request is made under PAIA (general record) or POPIA Section 23 (personal information).
4. Pay the applicable request or access fee (see Section 8).
5. BONDEED will process the request within the prescribed timeframes (usually 30 days).

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### 8. Fees

Fees are determined by the PAIA Fee Regulations:

Item	Fee (ZAR)
Photocopy / printed A4 page	R1.10
Printed copy from electronic file	R0.75 per page
Copy on CD	R70.00 per CD
Postage	Actual cost
Search & preparation time (per hour or part thereof)**	R30.00

#### Notes:

- For **non-personal** requests (PAIA), a request fee may apply before processing begins.
- For **personal information** requests (POPIA Section 23), no request fee is payable, but an access fee may apply if reproduction or preparation exceeds one hour.
- If search/preparation costs exceed R100, a deposit of one-third of the estimated cost may be requested.

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### 9. POPIA Section 23 – Access to Personal Information

Under Section 23 of POPIA, a data subject may request:

- Confirmation of whether BONDEED holds their personal information.
- Access to their personal information.
- A description of the personal information held, including the identity of third parties who have accessed it.

Such requests will be processed within a reasonable time, in an understandable format, and subject to applicable access fees.

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## 10. POPIA Section 24 – Correction or Deletion of Personal Information

A data subject may request BONDEED to:

- Correct or delete personal information that is inaccurate, irrelevant, excessive, out of date, incomplete, misleading, or unlawfully obtained.
- Destroy or delete records that BONDEED is no longer authorised to retain.

Requests must be made in the prescribed format and accompanied by proof of identity.

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## 11. Remedies

If a requester is dissatisfied with BONDEED's response:

- They may lodge a complaint with the Information Regulator:  
**Website:** [www.inforegulator.org.za](http://www.inforegulator.org.za)  
**Email:** [complaints.IR@inforegulator.org.za](mailto:complaints.IR@inforegulator.org.za)
- They may also institute court proceedings in terms of PAIA or POPIA.

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## 12. Availability of the Manual

This manual is available:

- On BONDEED's website as a downloadable PDF.
- By requesting a copy from the Information Officer via email.

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## 13. Cross-Border Transfers of Personal Information

BONDEED may transfer or store personal information on secure data servers located in the European Union. Such transfers are conducted in accordance with Section 72 of POPIA. BONDEED makes use of POPIA-compliant services, including Zoho's EU-based cloud infrastructure, which provides security and data protection standards that meet or exceed South African requirements.