

STOR-AGE PROPERTY REIT LIMITED

MANUAL

in terms of

Section 51 of

The Promotion of Access to Information Act

2/2000

(the "ACT")

Last update: 24 June 2021

Access to information Manual

1. Introduction to Stor-Age and scope

Stor-Age is a Real Estate Investment Trust whose shares are listed on the JSE. It derives rental income from its properties developed or acquired for trading. Stor-Age was listed on the JSE in November 2015.

The scope of this manual includes Stor-Age and the following related entities in which Stor-Age has a direct interest:

Holding company	Registration number	Incorporation
Stor-Age Property REIT Limited	2015/168454/06	South Africa
Subsidiaries		
Roeland Street Investments (Pty) Ltd	2011/011717/07	South Africa
Roeland Street Investments 2 (Pty) Ltd	2012/206233/07	South Africa
Unit Self Storage (Pty) Ltd	2016/499256/07	South Africa
Stor-Age International (Pty) Ltd	2017/356027/07	South Africa
Gauteng Storage Properties (Pty) Ltd	2004/009597/07	South Africa
Storage RSA Trading (Pty) Ltd	2003/007337/07	South Africa
Betterstore Self Storage Holdings Limited	51216	Guernsey
Betterstore Self Storage Properties I Limited	54467	Guernsey
Betterstore Self Storage Properties III Limited	51216	Guernsey
Betterstore Self Storage Operations Limited	07272715	UK
Betterstore Properties UK Limited	11810512	UK
Flexi Store Self Storage Limited	04713546	UK
Storage Boost Holdings Limited	06413968	UK
Storage Boost Limited	06652201	UK

Joint Venture companies: cont.

Sunningdale Self Storage (Pty) Ltd	2018/018193/07	South Africa
K2021547143 (South Africa) (Pty) Ltd	2021/547143/07	South Africa
K2021547526 (South Africa) (Pty) Ltd	2021/547526/07	South Africa
SK JV 1 Limited	13091047	UK
SK JV 2 Limited	13290067	UK

2. Company contact details (Section 51 (1) (a) of PAIA)

Information officer: Mr. Stephen Lucas

Address: 216 Main Road, Claremont
Cape Town
7708
South Africa

Telephone: +27 (021) 6713323

Website: www.stor-age.co.za

E-mail: info@stor-age.co.za

3. The Act (Section 51(1) (b)) of PAIA

3.1. The Act grants a requester access to records of a private body, if the record is required for the exercise or protection of any rights. If a public body lodges a request, the public body must be acting in the public interest.

3.2. Requests in terms of the Act shall be made in accordance with the prescribed procedures, at the rates provided. The forms and tariff are dealt with in paragraphs 6 and 7 of the Act.

3.3. Requesters are referred to the Guide in terms of Section 10 which has been compiled by the South African Human Rights Commission, which will contain information for the purposes of exercising Constitutional Rights. The Guide is available from the SAHRC.

3.4. The contact details of the Commission are:

Postal Address:	Private Bag 2700, Houghton, 2041
Telephone Number:	+27-11-877 3600
Fax Number:	+27-11-403 0625
Website:	www.sahrc.org.za

4. Purpose of the Manual

The purpose of this manual is to: -

- 4.1. Detail the procedure to be followed by a requestor and the manner in which a request for access shall be facilitated, for purposes of PAIA; and
- 4.2. For the purposes of POPI, detail the purpose for which personal information may be processed; a description of the categories of data subjects for whom Stor-Age processes personal information, as well as the categories of personal information relating to such data subjects; and the recipients to whom personal information may be supplied.

5. Definitions and Interpretation

The following words will bear the following meanings in this manual: -

- 5.1. "**Act**" shall mean the Promotion of Access to Information Act, No 2 of 2000, together with all relevant regulations published;
- 5.2. "**Data Subject**" shall mean the person to whom personal information relates;
- 5.3. "**JSE**" JSE Limited, a company duly registered and incorporated with limited liability under the company laws of the Republic of South Africa under registration number 2015/168454/06;
- 5.4. "**Manual**" shall mean this manual, together with all annexures thereto as available at the offices of Stor-Age from time to time;
- 5.5. "**PAIA**" shall mean Promotion of Access to Information Act, No 2 of 2000;
- 5.6. "**POPI**" shall mean Protection of Personal Information Act, No 4 of 2013;
- 5.7. "**POPI Regulations**" shall mean regulations promulgated in terms of section 112(2) of POPI;
- 5.8. "**Private Body**" shall ascribe to the meaning as promulgated in section 1 of both PAIA and POPI;
- 5.9. "**Processing**" shall ascribe to the meaning as promulgated in section 1 of POPI;
- 5.10. "**Record**" shall ascribe to the meaning as promulgated in section 1 of POPI;
- 5.11. "**Responsible Party**" shall mean 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;

- 5.12. "Requestor" shall ascribe to the meaning as promulgated in section 1 of PAIA;
- 5.13. "Request for Access" shall ascribe to the meaning as promulgated in section 1 of PAIA;
- 5.14. "SAHRC" shall mean the South African Human Rights Commission;
- 5.15. "Stor-Age" shall mean Stor-Age Property REIT Limited (registration number 2015/168454/06), a company incorporated in South Africa, and various of its subsidiaries as set out on page 2-3.

6. Records automatically available to the public (Section 51(1) of PAIA)

Annual reports	Available on website www.stor-age.co.za
Interim reports	Available on website www.stor-age.co.za
Investment analyst presentations	Available on website www.stor-age.co.za
Stock Exchange News Service announcements	Available on website www.stor-age.co.za

7. Records held that may be requested (Section 51(1)(e) of PAIA)

Note: This section of the Manual sets out the subject and categories of records held by Stor-Age. The inclusion of any subject or category of records should not be taken as an indication that records falling within those subjects and/or categories will be made available under the Act. In particular, certain grounds for refusal as set out in the Act may be applicable to a request for such records.

7.1. Administration

- Policies and procedures
- Internal correspondence (including minutes of meetings) not marked confidential
- Risk, security and insurance records, operational records

7.2. Statutory records

- Incorporation documents
- Memorandum of Incorporation
- Minutes of shareholder meetings
- Records relating to the appointment of directors, auditors
- Secretary, public office and any other officer
- Share register and other statutory registers
- Statutory returns to relevant authorities

7.3. Financial records

- Accounting records, books and documents
- Banking records
- Auditors' reports
- Tax records and returns

VAT returns

SARB returns

Statistics SA returns

Management reports

Rental agreements

7.4. Human resources / employment records

Employment contracts

BEE statistics

Career development

Disciplinary code

Employment equity reports and plans

Recruitment policies

Retirement benefits and medical aid records

STEAs records

Training records and skills development

PAYE, UIF and WCA returns

7.5. Intellectual Property

Trade-marks, copyrights and designs

Records relating to domain names

Licenses relating to intellectual property rights

Other agreements relating to intellectual property rights

7.6. Information technology

Contract agreements with service providers

Other documentation pertaining to computer systems and computer programmes

8. The request procedures

Form of request:

- 8.1. The requester must use the prescribed form to make the request for access to a record. This must be made to the information officer. This request must be made to the address or electronic mail address of the information officer.
- 8.2. The requester must provide sufficient detail on the request form to enable the information officer to identify the record and the requester. The requester should also indicate which form of access is required. The requester should also indicate if he or she wishes to be informed in any other manner and state the necessary particulars to be so informed.
- 8.3. The requester must identify the right that he or she is seeking to exercise or protect and provide an explanation as to why the requested record is required for the exercise or protection of that

right.

8.4. If a request is made on behalf of a person, the requester must submit proof of the capacity in which the requester is making the request to the satisfaction of the information officer.

9. Fees:

9.1. The PAIA Act provides for two types of fees:

- a) A request fee, payable by a Requestor other than a personal Requestor; and
- b) An access fee, which must be calculated by considering reproduction costs, search and preparation time and cost, as well as postage costs.

9.2. When a request is received by the information officer, the information officer shall by notice require the Requester, other than a personal Requester, to pay the prescribed request fee (if any) before further processing of the request.

9.3. If a search for the record is necessary and the preparation of the record for disclosure, including arrangement to make it available in the requested form, requires more than the hours prescribed in the regulations for this purpose, the information officer shall notify the Requester to pay as a deposit the prescribed portion of the access fee which would be payable if the request is granted.

9.4. The information officer shall withhold a record until the Requester has paid the fee or fees as indicated.

9.5. A Requester whose Request for Access to a record has been granted, must pay an access fee for reproduction and for search and preparation, and for any time reasonably required in excess of the prescribed hours to search for and prepare the record for disclosure, including making arrangements to make it available in the request form.

9.6. If a deposit has been paid in respect of a Request for Access, which is refused, then the information officer shall repay the deposit to the Requester.

9.7. The fee that the Requester must pay to a Private Body is R50. The Requester may lodge an application to the court against the tender or payment of the requested fee [s 54(3)(b)].

10. Grounds for refusal

Stor-Age may refuse a request for information on the following basis:

- Mandatory protection of the privacy of a third party who is a natural person, which would involve the unreasonable disclosure of personal information of that natural person;
- Mandatory protection of the commercial information of a third party;
- Trade secrets of that third party;
 - Financial, commercial, scientific or technical information which disclosure could likely cause harm to the financial or commercial interests of that third party; and
 - Information disclosed in confidence by a third party to Stor-Age, if the disclosure could put that third party at a disadvantage in negotiations or commercial competition;
- Mandatory protection of confidential information of third parties if it is protected in terms of any agreement or legislation;
- Mandatory protection of confidential information if the disclosure would constitute a breach of a duty or confidence to a third party in terms of any agreement;
- Mandatory protection of the safety of individuals and the protection of safety of property;
- Mandatory protection of records which would be regarded as privileged in legal proceedings;

- The commercial activities of Stor-Age, which may include:
 - Trade secrets of Stor-Age;
 - Financial, commercial, scientific or technical information which disclosure could likely cause harm to the financial or commercial interests of Stor-Age; and
 - Information which, if disclosed, could put Stor-Age at a disadvantage in negotiations or commercial competition;
 - A computer programme which is owned by Stor-Age, and which is protected by copyright; and
 - The research information of Stor-Age or a third party on behalf of Stor-Age if the disclosure would expose the third party, Stor-Age or the researcher of the subject matter of the research to a serious disadvantage.
- Requests for information that are clearly frivolous or vexatious, or which involve an unreasonable diversion of resources, shall be refused.

11. Processing of Personal Information

Purpose of processing:

Stor-Age uses the personal information under its care in the following ways:

- Administration of invoice payments and issuing of invoices
- Rendering services according to instructions given by clients
- Staff administration which will include existing and potential new employees
- Keeping of accounts and records
- Complying with tax laws
- To provide accounts and services to the customer, in accordance with terms agreed to by the customer
- To undertake activities related to the provision of accounts, services and trade transactions
- The purposes related to any authorised disclosure made in terms of collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction, agreement, law or regulation
- Any additional purposes expressly authorised by the customer
- Any additional purposes as may be notified to the customer or Data Subjects in any notice provided by Stor-Age
- To comply with any regulation passed under the relevant legislation, or any legal process put forward by any regulatory authority
- To protect Stor-Age's rights and property, including intellectual property

12. List of applicable legislation

- Basic Conditions of Employment Act, No 75 of 1997
- Occupational Health and Safety Act, No 85 of 1993
- Broad-Based Black Economic Empowerment Act, No 53 of 2003
- Consumer Protection Act, No 68 of 2008
- Companies Act, No 71 of 2008
- Pension Funds Act, No 24 of 1956
- Compensation for Occupational Injuries and Health Diseases Act, No 130 of 1993
- Skills Development Levies Act, No 9 of 1999
- Consumer Affairs (Unfair Business Practices) Act, No 71 of 1988

- Skills Development Act, No 97 of 1998
- Copyright Act, No 98 of 1978
- Trade Marks Act, No 194 of 1993
- Employment Equity Act, No 55 of 1998
- Unemployment Contributions Act, No 4 of 2002
- Harmful Business Practices Act, No 23 of 1999
- Unemployment Insurance Act, No 63 of 2001
- Income Tax Act, No 95 of 1967 Value Added Tax Act, No 89 of 1991
- Intellectual Property Laws Amendments Act, No 38 of 1997
- Electronic Communications and Transactions Act, No 37 of 2007
- Labour Relations Act, No 66 of 1995
- Promotion of Access of Information Act, No 37 of 2007
- National Credit Act, No 34 of 2005
- Tax Administration Act, No 28 of 2011
- Financial Markets Act, No 19 of 2012
- Securities Transfer Act, No 25 of 2007

13. Availability of the manual (Section 52(3) of PAIA)

The manual is available for inspection at the offices of Stor-Age free of charge.

The manual can also be accessed on the websites of the SAHRC (www.sahrc.org.za) and Stor-Age (www.stor-age.co.za) and may be published in the Government Gazette.

14. Prescribed fees and forms in respect of private bodies

The prescribed forms and fees for requests to private bodies, are available on the website of the Department of Justice and Constitutional Development, www.doj.gov.za.