

Manual in terms of section 51 of the Promotion of Access to Information Act

Access to information held by Darryn Brick Appraisals (Pty) Ltd, a sworn appraisal practice serving estates and legal matters, and a description of the personal information it processes.

Act: Promotion of Access to Information Act 2 of 2000

Read with: Protection of Personal Information Act 4 of 2013

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1 Purpose of this manual

Section 51(1) of the Promotion of Access to Information Act 2 of 2000

The Promotion of Access to Information Act gives effect to the constitutional right of access to information held by another person where that information is required for the exercise or protection of any right. Every private body must compile a manual describing the records it holds and how a person may request access to them.

This manual is that document for Darryn Brick Appraisals (Pty) Ltd. It describes the company, the records it holds, the personal information it processes, and the procedure and fees for requesting access to a record.

It is written to be read by a member of the public. Nothing in it limits any right a person has under the Act, and nothing in it is a commitment to release a record that the Act permits or requires the company to withhold.

2 Particulars of the private body

Section 51(1)(a)

The company

Registered name	Darryn Brick Appraisals (Pty) Ltd
Trading as	DBAZA
Registration number	2018/257645/07
Nature of business	Sworn appraisals of immovable property, vehicles, jewellery, moveable assets, businesses and shares for deceased and insolvent estates, divorce and other legal matters. The company's director is a sworn appraiser appointed by the Master of the High Court, Cape Town.
Registered address	16 Bellevue Road, Sea Point, Cape Town, 8005, Western Cape, South Africa
Postal address	16 Bellevue Road, Sea Point, Cape Town, 8005, Western Cape, South Africa
Telephone	074 832 2740
Website	dbaza.co.za

Head of the private body and Information Officer

In terms of section 1 of the Act, the head of a private body that is a juristic person is its chief executive officer or equivalent, or a person duly authorised by that officer. The same person is the Information Officer for the purposes of the Protection of Personal Information Act.

Information Officer	Darryn Brick, Chief Executive Officer
Email	darryn@dbaza.co.za
Telephone	074 832 2740
Information Regulator	Registered with the Information Regulator (South Africa) as required by the Protection of Personal Information Act, under registration number 2026-067810, registered on 28 September 2026

Deputy Information Officer

No Deputy Information Officer has been designated. All requests are dealt with by the Information Officer.

3 The Information Regulator's guide

Sections 10 and 51(1)(b)

The Information Regulator has compiled a guide, in each official language, containing the information a person reasonably requires in order to exercise any right under the Act. The guide is available free of charge from the Information Regulator, and on its website.

Body	The Information Regulator (South Africa)
Address	Woodmead North Office Park, 54 Maxwell Drive, Woodmead, Johannesburg, 2191
Telephone	010 023 5200 (toll free 0800 017 160)
General enquiries	enquiries@inforegulator.org.za
PAIA complaints	PAIAComplaints@inforegulator.org.za
Website	inforegulator.org.za

4 Records available without a request

Section 52(2)

Darryn Brick Appraisals (Pty) Ltd has not published a notice under section 52(1) of the Act describing categories of records that are automatically available without a request.

The following are nevertheless available to anyone, free of charge, without a request under the Act:

- The public pages of dbaza.co.za, including the description of the company's services.
- The company's payment terms and conditions, published at dbaza.co.za/payment-terms-conditions.
- This manual.

Appraisal reports, certificates and valuation forms are prepared for the party who instructed them and are not published. They are held in confidence and are available only in terms of the Act.

5 Records available in terms of other legislation

Section 51(1)(c)

Records are held and, where the relevant statute requires it, made available in terms of the following legislation. This list is not a statement that every record held under each statute is open to the public; it identifies the legislation under which records are kept.

- Companies Act 71 of 2008
- Administration of Estates Act 66 of 1965
- Estate Duty Act 45 of 1955
- Insolvency Act 24 of 1936
- Matrimonial Property Act 88 of 1984 and the Divorce Act 70 of 1979
- Income Tax Act 58 of 1962 and the Tax Administration Act 28 of 2011
- Value-Added Tax Act 89 of 1991, to the extent that it applies to the company
- Protection of Personal Information Act 4 of 2013
- Electronic Communications and Transactions Act 25 of 2002
- Consumer Protection Act 68 of 2008
- Basic Conditions of Employment Act 75 of 1997 and the Labour Relations Act 66 of 1995, where the company employs staff

6 Subjects and categories of records held

Section 51(1)(d)

The company holds records on the subjects below. Records may be held in paper or electronic form.

SUBJECT	CATEGORIES OF RECORDS
Company and governance	Founding documents, memorandum of incorporation, CIPC filings and certificates, share register, director and shareholder records, board and shareholder resolutions, minutes, statutory registers.
Appointment and professional standing	The director's appointment as a sworn appraiser by the Master of the High Court, Cape Town, records of the oath and appointment, and correspondence with the Master.
Instructions and matter files	Letters of instruction, quotations and acceptances, estate and case reference numbers, title deeds, sectional title plans, Surveyor-General diagrams, municipal valuation and rates records, zoning records, building plans, vehicle registration documents, inventories of moveable assets, company and share records supplied for valuation, inspection notes and photographs.
Appraisal work product	Comparable sales and other market evidence, working papers and calculations, draft and final appraisal reports, sworn appraisal certificates, SARS REV 246 estate duty valuation forms, amendments, and correspondence about them.
Clients and instructing parties	Contact details of attorneys, executors, trust companies, fiduciaries, business rescue practitioners, liquidators and other instructing parties, and correspondence with them.
Financial	Accounting records, quotations, invoices, receipts and payment records, bank statements, historical invoicing records, tax returns and assessments, insurance policies, loan account records.
Employment and contractors	Contracts, contact, identity, tax and banking details, and payment records of any employee or contractor the company engages.
Communications	Email and other correspondence, website content.
Legal and compliance	Agreements with suppliers and service providers, regulatory registrations and correspondence, policies and procedures, correspondence with professional advisers, records of any dispute or litigation.

7 Processing of personal information

Section 51(1)(e) read with the Protection of Personal Information Act 4 of 2013

7.1 Categories of data subjects and the personal information held about them

DATA SUBJECT	PERSONAL INFORMATION
Deceased persons, as recorded in estate matters	Name, identity number, date of death, estate reference number, last address, and details of the assets being appraised.

DATA SUBJECT	PERSONAL INFORMATION
Executors, heirs, beneficiaries, spouses and co-owners	Name, identity number where supplied, contact details, capacity in the matter, and interest or share in the asset. This can include the names of minor beneficiaries where an instruction names them.
Parties to divorce and other legal proceedings	Name, identity number where supplied, contact details, case number, and details of the property concerned.
Instructing attorneys, fiduciaries and their staff	Name, firm, position, contact and address details, and correspondence.
Occupants, tenants, estate agents and others present at an inspection	Name and contact details where given, and photographs of the premises, which may incidentally show a person or personal belongings.
Owners and buyers of comparable properties	Name, property description, sale price and date, as recorded in the deeds registry and property data sources.
Suppliers and service providers	Name, contact details, banking details, and the records of the agreement between the parties.
Directors, and any employees or contractors	Name, identity number, contact details, address, banking details, tax reference and payment records.

The company does not seek special personal information as defined in the Act. Information about a child is processed only where an instruction names a minor beneficiary, and only for the purpose of the appraisal and as the Act permits.

7.2 Purpose of processing

- To accept, carry out and report on appraisal instructions, including the inspection of the asset.
- To issue sworn appraisals, certificates and SARS estate duty valuation forms to the instructing party, for submission to the Master of the High Court, SARS, a court or another party entitled to them.
- To quote, invoice and receive payment for the work.
- To keep a record of each appraisal and its basis, so that it can be explained or defended if it is questioned.
- To comply with the law, including estate, tax and company legislation, and to respond to lawful requests from a regulator, the Master of the High Court, SARS or a court.
- To administer the company's own affairs, including accounting and supplier relationships.

7.3 Recipients of personal information

Personal information is shared only where it is necessary for a purpose above, and only with:

- The instructing attorney, executor or other party, who receives the appraisal report, certificate and valuation form.
- The Master of the High Court, SARS, a court, or another party to the matter, where the appraisal is submitted to them in the course of the matter, ordinarily by the instructing party.
- Service providers that host the company's accounting system, email, file storage and document preparation tools, each bound by its terms to use the information only to provide its service.
- Banks and financial institutions, for the processing of payments.
- Professional advisers, including accountants and attorneys.
- A regulator, law enforcement agency or court, where the law requires or permits it.

7.4 Transfers outside South Africa

Certain service providers used by the company process information outside the Republic. Where that occurs, the transfer is made on the grounds permitted by section 72 of the Protection of Personal Information Act, under the provider's terms, which form part of the company's agreement with it and require a level of protection substantially similar to that Act.

The providers concerned are:

Xero Limited	New Zealand, with hosting outside South Africa. The company's accounting system, holding the names and contact details of clients and instructing parties, quotations, invoices and payment records.
Zoho Corporation	Hosting outside South Africa. The company's earlier invoicing system, which holds historical invoices and client contact details until they are archived.
Apple Inc. (iCloud)	United States and other locations. File storage and synchronisation for company records, including matter files and photographs.
Anthropic PBC (Claude)	United States. An assistant used in preparing and checking appraisal documents, to which matter information is supplied for that purpose.

This list is reviewed before each issue of this manual. A current list is available from the Information Officer on request.

7.5 Security safeguards

The company takes appropriate, reasonable technical and organisational measures to prevent loss of, damage to, or unauthorised destruction of personal information, and unlawful access to or processing of it. These include:

- Password protection of the devices and accounts that hold company records, with multi-factor authentication where the service offers it.
- Access limited to the director and to any person engaged on a particular matter, and only to the information that matter needs.
- Encryption of information in transit to and from the company's email and cloud services.
- Regular backups of company records, held separately from the working copies.
- Original signed documents kept secure until they are delivered to the instructing party.
- Procedures for identifying, containing and reporting a compromise of personal information, including notification to the Information Regulator and to affected data subjects where the Act requires it.

7.6 Retention

Personal information is retained only for as long as it is needed for the purpose it was collected for, or for as long as a law requires it to be kept, whichever is longer. Appraisal files are retained for at least five years after the matter is completed, being the period for which records must be kept under the Tax Administration Act, and for longer where the appraisal may still be relied on or questioned in the estate, in proceedings or by SARS. When a retention period ends the record is destroyed or de-identified.

7.7 Rights of a data subject

A data subject may ask the company to confirm whether it holds personal information about them, ask for a copy of it, ask for information that is inaccurate, irrelevant, excessive, out of date, incomplete, misleading or unlawfully obtained to be corrected or deleted, and object to the processing of it on the grounds set out in the Act. A request of this kind is made to the Information Officer using the contact details in section 2.

8 How to request access to a record

Sections 50, 53 and 56

8.1 When access must be given

Under section 50 of the Act, a requester must be given access to a record held by a private body if the record is required for the exercise or protection of any right, the procedural requirements of the Act have been met, and access is not refused on a ground set out in the Act.

8.2 The procedure

1. Complete the prescribed request form for access to a record of a private body, obtainable free of charge from the Information Regulator's website at info regulator.org.za, or from the Information Officer on request.
2. Provide sufficient particulars to enable the company to identify the record and to identify you as the requester, and state the right you seek to exercise or protect and why the record is required for it.
3. State the form of access you prefer, and whether you wish to be informed of the decision in any manner in addition to writing, giving the necessary particulars.
4. If you are making the request on behalf of another person, provide proof of the capacity in which you are doing so, to the satisfaction of the Information Officer.
5. Send the completed form to the Information Officer at the address or email address in section 2, together with proof of payment of the request fee where one is payable.

8.3 What happens next

The Information Officer will decide the request as soon as reasonably possible, and in any event within thirty days of receipt. That period may be extended once, by a further period of not more than thirty days, where the request is for a large number of records or requires a search through records held at another place, and you will be told in writing if it is extended and why.

You will be told in writing whether access is granted or refused. If access is refused, the notice will state the reasons and the provision of the Act relied on, and will describe the remedies available to you.

If the record contains the personal information of a third party, the Information Officer may be required to take reasonable steps to inform that party and to give them an opportunity to make representations before a decision is taken.

9 Fees

Section 54 and the Regulations made under the Act

Two kinds of fee may be payable. A **request fee** is payable before the request is processed. An **access fee** is payable before a record is handed over, and covers the cost of searching for, preparing and reproducing it.

A personal requester, meaning a requester seeking a record that contains their own personal information, is not required to pay the request fee.

9.1 Request fee

ITEM	AMOUNT
Request fee, payable by a requester other than a personal requester	R140.00

9.2 Access fees

ITEM	AMOUNT
Photocopy or printed copy of an A4 page, or part of a page	R2.00
Copy in a computer-readable form, on a flash drive supplied by the requester	R40.00
Copy in a computer-readable form, on a compact disc supplied by the requester	R40.00
Copy in a computer-readable form, on a compact disc supplied by the company	R60.00
Transcription of visual images	By quotation
Transcription of an audio record, per A4 page	R24.00
Copy of an audio record, on a flash drive or compact disc supplied by the requester	R40.00
Copy of an audio record, on a compact disc supplied by the company	R60.00
Searching for and preparing a record for disclosure, per hour or part of an hour, excluding the first hour	R145.00
Maximum payable for searching and preparation	R435.00
Copying or reproduction of a visual image	By quotation

9.3 Deposit

Where the Information Officer is satisfied that searching for and preparing a record will take more than six hours, a deposit of one third of the access fee that would be payable may be required before the request is processed. If access is then refused, the deposit is refunded.

9.4 Payment

Fees are payable by electronic transfer to the company's bank account, the details of which the Information Officer will provide on request. Proof of payment must accompany the request.

These amounts are the amounts prescribed by the Regulations made under the Act at the date of this manual. If the prescribed amounts change, the amounts then in force apply.

10 Grounds on which a request may be refused

Chapter 4 of Part 3 of the Act

The Act requires or permits a private body to refuse access to a record on the following grounds. Where a ground applies to only part of a record, access is given to the rest of it.

- **Privacy of a third party who is a natural person**, where disclosure would involve an unreasonable disclosure of their personal information.
- **Commercial information of a third party**, including trade secrets, financial, commercial, scientific or technical information the disclosure of which would be likely to cause harm, and information supplied in confidence during contract negotiations.
- **Information supplied in confidence by a third party**, where disclosure would be a breach of a duty of confidence owed to them.
- **The safety of an individual, or the protection of property**, where disclosure could reasonably be expected to endanger either.
- **Records privileged from production in legal proceedings**, unless the privilege has been waived.
- **Commercial information of the company**, including trade secrets, information the disclosure of which would be likely to cause harm to its commercial or financial interests, and information the disclosure of which could put it at a disadvantage in contractual or other negotiations or prejudice it in commercial competition.
- **Research information** of the company or a third party, where disclosure would be likely to expose the researcher or the subject matter of the research to serious disadvantage.

A request that is manifestly frivolous or vexatious, or that would involve a substantial and unreasonable diversion of resources, may also be refused.

Despite any of the grounds above, the Act requires disclosure where the record reveals a substantial contravention of the law or an imminent and serious public safety or environmental risk, and the public interest in disclosure clearly outweighs the harm the ground protects against.

11 Remedies available to a requester

Sections 56, 77A and 78

There is no internal appeal against a decision of the head of a private body.

A requester who is dissatisfied with a decision, including a refusal of access, the form of access given, the fee charged, or a failure to decide within the period allowed, may:

- lodge a complaint with the Information Regulator, using the prescribed complaint form, within one hundred and eighty days of the decision; or

- apply to a court with jurisdiction for appropriate relief.

The Information Regulator's contact details are set out in section 3 of this manual. A third party who is dissatisfied with a decision to grant access to a record has the same remedies.

12 Availability and updating of this manual

Section 51(3)

This manual is available:

- on the company's website at dbaza.co.za;
- at the company's registered address, for inspection during office hours, free of charge; and
- from the Information Officer on request, in which case the prescribed fee for a copy may be charged.

A copy has been submitted to the Information Regulator where the Act requires it.

The manual is reviewed at least once a year and whenever the company's particulars, the records it holds or the way it processes personal information change materially. The version and date on the first page identify the edition in force.

Darryn Brick Appraisals (Pty) Ltd · Manual 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.

Version 1.0. Fees are those prescribed by the Regulations made under the Act at the date of issue.