POPIA Policy – Centurion Real Estate

Nov 1, 2026 · Mariana Hattingh

1. Our Commitment

Centurion Real Estate is committed to protecting personal information in line with the Protection of Personal Information Act 4 of 2013 (POPIA). We respect the privacy of every landlord, tenant, seller, purchaser and other person whose information we handle in the course of our property practice.

Detail	Information
Registered name	Centurion Real Estate
Trading name	Centurion Real Estate
Company registration number	2005/167065/23
PPRA Fidelity Fund Certificate number	F103261
Physical address	Block E, Corporate Park 66, 269 Von Willich Street, Die Hoewes, Centurion
Postal address	Block E, Corporate Park 66, 269 Von Willich Street, Die Hoewes, Centurion
Telephone	012 661 5144 / 082 775 5140
Email	mariana@centurionrealty.co.za
Website	www.centurionrealestate.co.za

In terms of POPIA, Centurion Real Estate is the **responsible party** for the personal information we collect from our clients and the other parties to our transactions.

2. Who This Policy Applies To

This policy applies to everyone whose personal information we process in our rental and sales business:

- **Landlords** who appoint us to let or manage their property.
- **Tenants and rental applicants**, including co-applicants, sureties and listed occupants.
- **Sellers** who mandate us to market and sell their property.
- **Purchasers and prospective buyers**, including people who view property or make offers.
- **Juristic persons** (companies, close corporations, trusts) and the directors, members, trustees and beneficial owners who act for them.

Where the data subject is a company or trust, POPIA also protects its information, and we treat it with the same care.

3. Personal Information We Collect

We collect only the information we need for the transaction and to meet our legal duties. All parties provide identity documents, contact details and proof of address for FICA verification.

Party	Information we collect
Landlords	ID or passport, contact details, residential address, bank details for rental payments, SARS tax number where required, title deed or proof of ownership, municipal account details, marital status and spouse details where consent is needed, company or trust documents where applicable
Tenants and applicants	ID or passport, contact details, current and previous addresses, employer and income details, payslips and bank statements, credit and rental history, references, emergency contact, number of occupants and their names, vehicle and pet details
Sellers	ID or passport, contact details, title deed details, bond and bank details, marital status and matrimonial property regime, spouse consent, municipal and levy account details, property condition disclosures, company or trust documents where applicable
Purchasers	ID or passport, contact details, residential address, marital status and matrimonial property regime, source of funds and finance details, bond pre-approval, income and employment details where relevant to the offer, company or trust documents where applicable

Children's information. Where a rental application lists occupants under 18, we record only their names and ages, with the consent of the parent or guardian who applies.

Special personal information. We do not ask for information about race, religion, health, or similar categories unless the law requires it.

4. Why We Process Your Information and Our Lawful Basis

We use personal information only for the purposes below, and on the lawful grounds listed in section 11 of POPIA.

Purpose	Who it affects	Lawful basis (POPIA s11)
FICA customer due diligence, sanctions and PEP screening, record-keeping and reporting	All parties	Legal obligation under the Financial Intelligence Centre Act 38 of 2001 (s11(1)(c))
Compliance with the Property Practitioners Act 22 of 2019 and PPRA requirements	All parties	Legal obligation (s11(1)(c))

Purpose	Who it affects	Lawful basis (POPIA s11)
Marketing a property, arranging viewings and presenting offers	Landlords, sellers, applicants, purchasers	Concluding or performing the mandate or agreement (s11(1)(b))
Assessing rental applications, including credit and reference checks	Tenants, applicants, sureties	Your consent, given on the application form (s11(1)(a))
Drafting and managing lease agreements, collecting rent and deposits, inspections, maintenance and deposit refunds	Landlords, tenants	Performing the lease and management mandate (s11(1)(b)); Rental Housing Act 50 of 1999 (s11(1)(c))
Drafting offers to purchase and liaising with attorneys, banks and bond originators until registration	Sellers, purchasers	Performing the sale agreement (s11(1)(b))
Sending property alerts and newsletters	Anyone who opts in	Your consent, which you may withdraw at any time (s11(1)(a), s69)

Processing required by FICA or other law is mandatory. It is not based on consent and cannot be stopped by withdrawing consent. If you do not provide the information the law requires, we cannot act for you or proceed with the transaction.

We do not sell personal information or use it for purposes unrelated to your property transaction.

5. Who We Share Information With

We share personal information only where it is needed for the transaction or required by law.

- **Rentals:** credit bureaus and tenant-screening agencies (with the applicant's consent), the landlord (for approving an applicant), the tenant (landlord contact details for the lease), contractors carrying out maintenance, and the Rental Housing Tribunal where a dispute is referred.
- **Sales:** the other party to the sale, conveyancing, transferring and bond attorneys, banks and bond originators, home inspectors and compliance certificate providers, and co-listing or co-selling agencies.
- **Regulators and authorities:** the Financial Intelligence Centre, the PPRA, SARS, the Information Regulator, courts and law enforcement where the law requires it.

Operators. Some service providers process personal information on our behalf. They may process it only on our instructions and under a written agreement that requires them to keep it secure, as sections 20 and 21 of POPIA require. Our operators are:

- **PayProp** for rental collection, payments to landlords and trust account administration.

- **TPN** for credit checks and tenant screening.
- **RubyFICA**, provided by Rubynet (Pty) Ltd (Registration number 2026/345895/07), for FICA customer due diligence and screening.
- **Afrihost** for email hosting.
- **Microsoft OneDrive** for secure cloud storage of client documents.

Cross-border transfers. Where an operator stores information outside South Africa, we transfer it only where section 72 of POPIA allows, for example where the recipient is bound by laws or an agreement giving similar protection.

6. Screening, Security and Retention

Automated screening and decisions. Sanctions, PEP and adverse-media screening, credit scores and any automated risk indicators are decision-support tools only. They do not, on their own, decide whether a tenant is approved or a transaction proceeds. A person at Centurion Real Estate reviews the results and makes the final decision. You have the rights in section 71 of POPIA regarding automated decision-making, including the right to make representations about a decision.

Security measures. We protect personal information against loss, damage and unauthorised access, as required by section 19 of POPIA. Our measures include:

- Access to client files limited to staff who need it, with individual passwords.
- Paper files kept in locked storage; documents shredded when no longer needed.
- Encryption, antivirus protection and regular backups on our systems.
- Confidentiality undertakings from staff and written operator agreements with service providers.
- Regular POPIA and FICA training for all staff and candidate practitioners.

Retention. We keep personal information only as long as the law or the purpose requires:

Record	Minimum retention period	Legal requirement
FICA records: identification, verification, screening and transaction records	5 years from the end of the business relationship or the date of the single transaction	Financial Intelligence Centre Act, s22 and s23
Mandates, leases, offers to purchase, mandatory disclosure forms and other documents relating to a sale or lease	5 years from the date of the document	Property Practitioners Act, s55(1)(d)
Rental applications, successful and unsuccessful	5 years from the date of the application	Property Practitioners Act, s55(1)(d)
Emails and other electronic messages with clients and the public	5 years from the date of the message	Property Practitioners Regulations, reg 40
Advertising and marketing material	5 years from the date of the material	Property Practitioners Act, s55(1)(e)

Record	Minimum retention period	Legal requirement
Trust account and accounting records	5 years	Property Practitioners Act, s54 and s55
Marketing contact lists	Until you opt out	POPIA consent (s11(1)(a), s69)

Records are kept longer if a dispute, investigation or legal process is underway. After the retention period, we destroy or de-identify the information.

Security compromises. If we have reasonable grounds to believe personal information has been accessed or acquired by an unauthorised person, we will notify the Information Regulator and the affected people as soon as reasonably possible, as section 22 of POPIA requires. The notice will be in writing, describe the compromise as far as known, and explain what you can do to protect yourself. Our operators must tell us immediately of any compromise affecting our clients' information.

7. Your Rights, Our Information Officer and Complaints

Your rights. Subject to FICA and other retention laws, you may:

- Ask whether we hold your personal information and request a copy.
- Ask us to correct or update inaccurate information.
- Ask us to delete information we are no longer entitled to keep.
- Object, on reasonable grounds, to processing that is not required by law.
- Withdraw consent where we rely on it, such as credit checks not yet run or marketing.
- Opt out of direct marketing at any time.
- Lodge a complaint with the Information Regulator.

Send requests to our Information Officer. Requests for access to records are handled under our PAIA Manual, available at our office and on request.

Information Officer

Detail	Information
Name	Mariana Hattingh
Email	mariana@centurionrealty.co.za
Telephone	082 775 5140
Address	Block E, Corporate Park 66, 269 Von Willich Street, Die Hoewes, Centurion
Information Regulator registration	Registered on 26 June 2026 under number 2026-044920, verifiable on the Regulator's eServices Portal
Deputy Information Officer	None appointed

Complaints to the Information Regulator

If you believe we processed your information in breach of POPIA, please contact our Information Officer first. You may also complain directly to the Regulator:

Detail	Information
Physical address	JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001
Postal address	P.O. Box 31533, Braamfontein, 2017
Telephone	010 023 5200
Toll-free	080 001 7160
General enquiries	enquiries@inforegulator.org.za
POPIA complaints	POPIAComplaints@inforegulator.org.za
PAIA complaints	PAIAComplaints@inforegulator.org.za
Website	inforegulator.org.za

Changes to this policy. We may update this policy from time to time. The current version is available at our office and on request.