



PAIA Manual

September 2025

1. INTRODUCTION

This PAIA Manual (the “Manual”) governs how we, **B2B Prime Services Africa (Pty) Ltd** (a subsidiary of B2B Prime Services EU Limited) (referred to herein as “we”, “us” or “B2Prime ZA”), a licensed Financial Service Provider authorised and regulated by the Financial Sector Conduct Authority of South Africa (“FSCA”) with FSP license no. 54191, comply with the requirements laid out in the Promotion of Access to Information Act 2 of 2000 (“the Act”).

PAIA gives third parties (“requesters”) the right to approach private bodies to request information held by them, which is required in the exercise and/or protection of any rights. On request, the private body is required to release such information, unless the Act expressly states that the records containing such information may or must not be released. This Manual informs requesters of procedural and other requirements which a request must meet and should be read in conjunction with the Protection of Personal Information Act 4 of 2013 and with our Privacy Policy.

2. GUIDE TO THE ACT

Pursuant to Section 10 of the Act, the Information Regulator has published a guide to the Act, containing the information needed for the exercise of the rights contemplated under the Act. The guide can be found on the Information Regulator’s website, as set out below. All queries regarding this guide should be directed to the Information Regulator.

Email: enquiries@info regulator.org.za

Website: www.info regulator.org.za

3. ACCESS TO RECORDS

Records held by us may be accessed on request only once the following requirements for access have been met:

- 3.1. that record is required for the exercise or protection of any rights;
- 3.2. the requester complies with the procedural requirements of the Act relating to a request for access to that record; and



3.3. access to that record is not refused in terms of any ground for refusal provided by the Act.

4. PROCEDURE

4.1. Any requester who would like to access records held by us may do so by completing the “Form 2 (Request for Access to Record)” found on the Information Regulator’s website, and submitting it to us via email (to the address set out in the section herein entitled “Contact Details”), or by delivery/post to our postal address.

4.2. The prescribed form must be filled in with sufficient detail to enable the Information Officer to identify:

4.2.1. the record or records requested;

4.2.2. the identity of the requester;

4.2.3. what form of access is required; and

4.2.4. the postal address, e-mail address or fax number of the requester.

4.3. A requester must state that he or she requires the information in order to exercise or protect a right, and clearly state what the nature of the right is so to be exercised or protected. The requester must also provide an explanation of why the requested record is required for the exercise or protection of that right.

4.4. We will process any request within 30 (thirty) days of receipt of such request, unless the requester has stated special reasons which satisfy the Information Officer that circumstances dictate that a shorter time period is appropriate.

5. DECISION

5.1. We will, within 30 (thirty) days of receipt of a request, decide whether to grant or decline a request and give notice with reasons (if required) to that effect.

5.2. The 30 (thirty) day period within which we must decide whether to grant or refuse a request, may be extended for a further period of not more than 30 (thirty) days if the request is for a large quantity of information or the request requires a search for information held at another office (other than the head office) and/or the information cannot reasonably be obtained within the original 30 (thirty) day period. The Information Officer will notify the requester in writing should an extension be necessary.

6. REASONS FOR REFUSAL

6.1. While all requests for access to information will be considered, the decision to grant such



request is made in a manner that balances the requester's right to access such information against any other rights held by us, as well as the rights of third parties.

6.2. A request for access may be justifiably refused for any of the reasons set out in the Act. This includes, but is not limited to:

- 6.2.1. Limitations aimed at the protection of personal information in line with the Protection of Personal Information Act 4 of 2013;
- 6.2.2. Commercial confidentiality of both ourselves and third parties;
- 6.2.3. Protection of safety of individuals and property; and
- 6.2.4. Legal privilege.

7. FEES

7.1. Under the Act, we are entitled to charge:

- 7.1.1. a request fee; and
- 7.1.2. an access fee, which must be calculated by taking into account reproduction costs, search and preparation time and cost, as well as postal costs where applicable.

7.2. When a request is received by the Information Officer, the Information Officer may by notice require the requester, other than a personal requester, to pay the prescribed request fee (if any), before further processing of the request.

7.3. 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.

7.4. The Information Officer shall be entitled to withhold a record until the requester has paid the fee or fees as indicated.

7.5. 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. 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.

8. SCHEDULE OF RECORDS

The following is a schedule of the records / information kept by us for which a request may be made for access. This schedule is not exhaustive and may be amended from time to time.



CATEGORY	RECORDS / INFORMATION
Client Records	Company & Contact Information Client Records & Correspondence Billing Information
Human Resource Records	Human Resource Policies & Procedures Employee Records & References Remuneration Records Performance Reviews Training Manuals & Records SETA Records Disciplinary Code Medical aid Records Pension Fund Records
Business Records	Company Policies and Secretarial Records Corporate Correspondence Licenses & Certifications Financial & Accounting Records Marketing Information & Strategies Product and Service Information
Supplier Records	Supplier Information Supplier Agreements & Contracts Billing Information

9. RECORDS AVAILABLE WITHOUT REQUEST

Records of a public nature, typically those disclosed on our website and in our various annual reports,



may be accessed without the need to submit a formal application.

Other non-confidential records, such as statutory records maintained at CIPC, may also be accessed without the need to submit a formal application. However, please note that an appointment to view such records will still have to be made with the Information Officer if in-person inspection is needed.

10. ACCESS TO MANUAL

The Manual will be made available for inspection, free of charge, by any interested party at our office, on reasonable prior notice. The Manual will also be available on our website.

11. CONTACT DETAILS

Company Name:	B2B Prime Services Africa (Pty) Ltd
Physical Address:	Unit 4, 29 First Avenue East, Parktown North, Johannesburg, South Africa
Postal Address:	Unit 4, 29 First Avenue East, Parktown North, Johannesburg, South Africa
Email:	za.compliance@b2prime.com
Website:	https://b2prime.com
Information Officer:	Martina Macadova