
TAPPI PAY (PTY) LTD

PAIA MANUAL

VERSION 1: 25 MAY 2026
FREQUENCY OF MANUAL: ANNUALLY
MANUAL OWNER: COMPLIANCE

MANUAL STATEMENT

This manual forms part of the manual owner's internal business processes and procedures.

- Any reference to the "organisation" shall be interpreted to include the "manual owner".
- The organisation's governing body, its employees, volunteers, contractors, suppliers and any other persons acting on behalf of the organisation are required to familiarise themselves with the manual's requirements and undertake to comply with the stated processes and procedures.
- Risk owners and control owners are responsible for overseeing and maintaining control procedures and activities.

MANUAL ADOPTION

By signing this document, I authorise the manual owner's approval and adoption of the processes and procedures outlined herein.

Name & Surname	Sean Maloney
Capacity	Director
Signature	<i>Sean Maloney</i>
Date	25 May 2026

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01 DEFINITIONS

Data Subject	The person to whom Personal Information relates.
Head	In relation to a private body means: (a) in the case of a natural person, that natural person or any person duly authorised by that natural person; (b) in the case of a partnership, any partner of the partnership or any person duly authorised by the partnership; (c) in the case of a juristic person – the chief executive officer or equivalent officer of the juristic person or any person duly authorised by that officer, or the person who is acting as such or any person duly authorised by such acting person.
Information Officer	The head of a private body.
Information Regulator	The Regulator established in terms of Section 39 of POPIA.
PAIA	The Promotion of Access to Information Act 2 of 2000, as amended from time to time.
Person	A natural person or a juristic person.
Personal Information	Information relating to an identifiable, living, natural person, and where applicable, an identifiable, existing juristic person. This includes: information relating to race, gender, sex, pregnancy, marital status, national origin, colour, sexual orientation, age, physical or mental health, disability, religion, belief, culture, language and birth; information relating to education, medical, financial, criminal or employment history; any identifying number, symbol, e-mail address, physical address, telephone number, location information, online identifier or biometric information; personal opinions, views or preferences of the person; correspondence sent by the person that is implicitly or explicitly of a private or confidential nature; the views or opinions of another individual about the person; and the name of the person if it appears with other personal information relating to the person.
Personal Requester	A requester seeking access to a record containing personal information about the requester.
POPIA	The Protection of Personal Information Act 4 of 2013, as amended from time to time.
Private Body	A natural person who carries or has carried on any trade, business or profession; a partnership which carries or has carried on any trade, business or profession; or any former or existing juristic person, but excludes a public body.
Processing	Any operation or activity or any set of operations, whether or not by automatic means, concerning personal information – including the collection, receipt, recording, organisation, storage, updating, retrieval, alteration, consultation or use, dissemination, merging, linking, restriction, degradation, erasure or destruction of information.
Public Body	Any department of state or administration in the national or provincial sphere of government or any municipality in the local sphere of government; or any other functionary or institution when exercising a power or performing a duty in terms of the Constitution or any legislation.
Requester	In relation to a private body, means any person – including but not limited to a public body or official thereof – making a request for access to a record of the organisation, or a person acting on behalf of such person.
Request for Access	A request for access to a record of the organisation in terms of section 50 of PAIA.
Record	Any recorded information regardless of the form or medium, in the possession or under the control of the organisation, irrespective of whether or not it was created by the organisation.
Third Party	In relation to a request for access to a record held by the organisation, means any person other than the requester.

02 MANUAL PURPOSE

The Promotion of Access to Information Act, 2000, gives effect to section 32 of the Constitution, which provides that everyone has the right to access information held by the State or any other person (or private body), when that information is required for the exercise or protection of any rights.

The purpose of PAIA is to:

- Foster a culture of transparency and accountability in public and private bodies by giving effect to the right of access to information; and
- Actively promote a society in which the people of South Africa have effective access to information to enable them to exercise and protect all of their rights more fully.

The organisation recognises everyone's right to access to information and is committed to provide access to the organisation's records where the proper procedural requirements as set out by PAIA and POPIA have been met.

The organisation's PAIA manual contains the following provisions:

Annexure	Description
Annexure A: Contact Details & Business Type	Provides the organisation's postal and street address, phone number, and e-mail address of the head of the organisation.
Annexure B: Section 10 PAIA Guide	Provides a description of the guide referred to in Section 10 of PAIA and how to obtain access to it.
Annexure C: Statutory Records	Describes the various statutes in terms of which the organisation is required to maintain records.
Annexure D: Availability of Records	Lists records held by the organisation and indicates whether each is freely available or requires a formal PAIA request. Records marked "Freely Available" can be accessed by contacting the Information Officer. Records marked "PAIA Request" require a formal request via Annexure E.
Annexure E: Request Procedure	Sets out the procedure required to be followed by a requester to obtain access to a record.
Annexure F: Prescribed Fees	Sets out the fees payable to the organisation prior to processing a request for access to a record.
Annexure G: Processing of Personal Information	Sets out the applicable aspects for the processing of personal information.
Annexure H: Outcome of Request & Fees Payable	Sets out the outcome of a request and any fees payable by the requester.

03 DUTIES OF THE INFORMATION OFFICER

The Information Officer of the organisation is responsible for:

- Publishing and proper communication of the manual – including creating manual awareness;
- The facilitation of any request for access;
- Providing adequate notice and feedback to the requester;
- Determining whether to grant a request for access to a complete/full record or only part of a record;
- Ensuring that access to a record, where so granted, is provided timeously and in the correct format; and
- Reviewing the manual for accuracy and communicating any amendments.

3.1 RIGHT OF ACCESS

The Information Officer may only provide access to any record held by the organisation to a requester if:

- The record is required for the exercise or protection of any right;
- The requester complies with the procedural requirements relating to a request for access to that record; and
- Access to that record is not refused in terms of any of the grounds for refusal listed below.

The requester must complete and submit Annexure E to the organisation.

3.2 GROUNDS FOR REFUSAL

The Information Officer must assess whether there are any grounds for refusing a request for access. Where any grounds for refusal are found, a request for access will not be granted and the Information Officer must complete Annexure H and make the completed Annexure available to the requester.

However, despite finding grounds for refusal, access to the record(s) will be provided where:

- The disclosure of the record would reveal evidence of a substantial contravention of, or failure to comply with the law or imminent and serious public or environmental risk; and
- The public interest in disclosing the record would clearly outweigh the harm contemplated.

If a request for access is made regarding a record containing information that would justify a ground for refusal, every part of the record which does not contain – or can reasonably be severed from – any such information must, despite any other provision of PAIA, also be disclosed.

Grounds for Refusal — Summary Table

A. Mandatory Protection of Privacy of a Third Party (Natural Person)

Grounds for Refusal:

Disclosure would involve the unreasonable disclosure of personal information about a third party natural person (including a deceased individual).

No Grounds for Refusal:

Record consists of information about an individual who has consented in writing to disclosure; is already publicly available; was provided to the organisation and the individual was informed it may be made public; relates to a minor's health under the requester's care; is about a deceased individual and the requester is next of kin; or relates to an official's position or functions.

B. Mandatory Protection of Commercial Information of a Third Party

Grounds for Refusal:

Record contains trade secrets; financial, commercial, scientific or technical information whose disclosure would harm a third party's commercial interests; or information supplied in confidence that could disadvantage a third party in negotiations.

No Grounds for Refusal:

Third party has consented in writing; or record reveals results of product/environmental testing that discloses a serious public safety or environmental risk.

C. Mandatory Protection of Confidential Information of a Third Party

Grounds for Refusal:

Disclosure would constitute an action for breach of a duty of confidence owed to a third party in terms of an agreement.

D. Mandatory Protection of Safety of Individuals and Property

Grounds for Refusal:

Disclosure could reasonably be expected to endanger life or physical safety; or would likely prejudice the security of a building, structure, system, means of transport, or any other property.

E. Mandatory Protection of Records Privileged from Production in Legal Proceedings

Grounds for Refusal:

Record consists of information privileged from production in legal proceedings, unless the person entitled to the privilege has waived it.

F. Commercial Information of the Organisation

Grounds for Refusal:

Record contains trade secrets of the organisation; financial, commercial, scientific or technical information whose disclosure would harm the organisation's commercial interests; information that could put the organisation at a disadvantage in negotiations; or a computer program owned by the organisation.

No Grounds for Refusal:

Record reveals results of product/environmental testing that discloses a serious public safety or environmental risk.

G. Mandatory Protection of Research Information

Grounds for Refusal:

Record contains information about research being carried out by or on behalf of a third party or the organisation, whose disclosure would likely expose the third party, the organisation, the researcher, or the subject matter to serious disadvantage.

04 NOTICE

4.1 FEE PAYABLE

Where a request for access has been received, the Information Officer will notify the requester of receipt and the prescribed fee (if any) that is payable prior to processing the request. Refer to Annexure F for a full breakdown of fees payable. Personal Requesters will not be charged a request fee.

The notice must state:

- The amount of the deposit payable (if any);
- That the requester may lodge a complaint with the Information Regulator or an application with a court against the tender or payment of the request fee, or the tender or payment of a deposit; and
- The procedure (including the period) for lodging the complaint with the Information Regulator or the application.

Except to the extent that third party notification may apply, the Information Officer to whom the request is made must, as soon as reasonably possible but in any event within 30 days after the request has been received in the prescribed format:

- Decide in accordance with PAIA whether to grant the request; and
- Notify the requester of the decision and, if the requester stated that he or she wishes to be informed in any other manner, inform him or her in that manner, if it is reasonably possible.

4.2 GRANTED REQUEST FOR ACCESS

If the request for access is granted, the notice must state:

- The access fee (if any) to be paid upon access;
- The form in which access will be given; and
- That the requester may lodge a complaint with the Information Regulator or an application with a court against the access fee or form of access granted.

4.3 REFUSED REQUEST FOR ACCESS

If the request for access is refused, the notice must:

- State adequate reasons for the refusal, including the relevant provision of PAIA that was relied on;
- Exclude from any such reasons any reference to the content of the records; and
- State that the requester may lodge a complaint with the Information Regulator or an application with a court against the refusal, and the procedure including the period for lodging a complaint.

4.4 UNDISCOVERABLE RECORD

Should all reasonable steps have been taken to find a record requested, and there are reasonable grounds for believing that the record is in the organisation's possession but cannot be found, or simply does not exist, the head of the organisation must, by way of affidavit or affirmation, notify the requester that it is not possible to provide access to that record. The affidavit or affirmation must provide a full account of all steps taken to find the record in question or to determine whether the record exists, including all communication with every person who conducted the search on behalf of the head.

05 AVAILABILITY OF THE MANUAL

A copy of this Manual is available:

- On www.tappipay.co.za;
- At the head office of TappiPay for public inspection during normal business hours;
- To any person upon request and upon payment of a reasonable prescribed fee; and
- To the Information Regulator upon request.

A fee for a copy of this Manual, as set out in Annexure F, shall be payable per each A4-size photocopy made.

ANNEXURE A: Contact Details & Business Type

A. Organisation Contact Details

Postal Address	21A Westlake Lifestyle Centre, Westlake Drive, Tokai, 7945
Street Address	21A Westlake Lifestyle Centre, Westlake Drive, Tokai, 7945
Phone Number	021 891 4848
Email Address	compliance@tappipay.co.za
Fax Number	N/A

B. Head of Organisation

Full Names & Surname	Sean Maloney
Email Address	sean@tappipay.co.za
Phone Number	0824114118
Fax Number	N/A

C. Business Type

The organisation conducts its main type of business in the following sector:

Payments and Financial Services

Head Signature: _____ Date: 25 May 2026

ANNEXURE B: Section 10 PAIA Guide

The Information Regulator has, in terms of section 10(1) of PAIA, updated and made available the revised Guide on how to use PAIA ("Guide"), in an easily comprehensible form and manner, as may reasonably be required by a person who wishes to exercise any right contemplated in PAIA and POPIA.

The Guide is available in each of the official languages and in braille, and contains descriptions of:

- The objects of PAIA and POPIA;
- The postal and street address, phone and fax number and, if available, electronic mail address of the Information Officer of every public and private body;
- The manner and form of a request for access to a record of a public body (section 11) and a private body (section 50);
- The assistance available from the Information Officer of a public body in terms of PAIA and POPIA;
- The assistance available from the Regulator in terms of PAIA and POPIA;
- All remedies in law available regarding an act or failure to act in respect of a right or duty conferred or imposed by PAIA and POPIA, including the manner of lodging an internal appeal, a complaint to the Regulator, or an application with a court;
- The provisions of sections 14 and 51 requiring a public body and private body to compile a manual, and how to obtain access to a manual;
- The provisions of sections 15 and 52 providing for the voluntary disclosure of categories of records;
- The notices issued in terms of sections 22 and 54 regarding fees to be paid in relation to requests for access; and
- The regulations made in terms of section 92.

Members of the public can inspect or make copies of the Guide from the offices of the public and private bodies, including the office of the Regulator, during normal working hours.

The Guide can also be obtained:

- Upon request to the Information Officer;
- From the website of the Regulator: <https://www.justice.gov.za/inforeg/>

PAIA grants a requester access to records of a private body, if the record is required for the exercise or protection of any rights. Where a public body lodges a request, the public body must be acting in the public interest. Requests in terms of PAIA shall be made in accordance with the prescribed procedures at the rates provided.

Head Signature: _____ Date: 25 May 2026

ANNEXURE C: Statutory Records

The organisation maintains statutory records and information in terms of the following legislation:

Administration of Estates Act	Insolvency Act
Arbitration Act	Labour Relations Act
Auditing Professions Act	Long-term Insurance Act
Basic Conditions of Employment Act	Medical Schemes Act
Closed Corporations Act	National Credit Act
Collective Investment Schemes Control Act	Occupational Health and Safety Act
Companies Act	Patents Act
Compensation of Occupational Injuries & Diseases Act	Pension Funds Act
Consumer Protection Act	Prevention of Organised Crime Act
Copyright Act	Prevention and Combatting of Corrupt Activities Act
Customs and Excise Act	Promotion of Equality and Prevention of Unfair Discrimination Act
Electronic Communications and Transactions Act	Protection of Constitutional Democracy against Terrorist and Related Activities Act
Employment Equity Act	Short-term Insurance Act
Financial Advisory & Intermediary Services Act	Skills Development Act
Financial Institutions (Protection of Funds) Act	Trademarks Act
Financial Intelligence Centre Act	Unemployment Insurance Act
Friendly Societies Act	Value Added Tax Act
Income Tax Act	

Head Signature: _____ Date: 25 May 2026

ANNEXURE D: Availability of Records

The organisation maintains the following categories of records. The status of the record's availability, the purpose for its processing and the relevant data subject category are set out below.

Records marked "Freely Available" can be accessed by contacting the Information Officer (see Annexure A) without formal procedures. Records marked "PAIA Request" require a formal request to be lodged as provided for in Annexure E.

Category	Record	Availability	Purpose	Data Subject
Public Affairs	Public Product Information	Freely Available	Convey Public Information	Organisation
	Public Corporate Records	Freely Available	Convey Public Information	Organisation
	Media Releases	Freely Available	Convey Public Information	Organisation
	Published Newsletters	Freely Available	Convey Public Information	Organisation
	Magazine Articles	Freely Available	Convey Public Information	Organisation
Regulatory & Administrative	Permits, Licenses or Authorities	Freely Available	Statutory Requirement	Organisation
	Conflict of Interest Management Policy	Freely Available	Statutory Requirement	Organisation
	Complaints Policy	Freely Available	Statutory Requirement	Organisation
	FICA Internal Rules	PAIA Request	Statutory Requirement	Organisation
	Health & Safety Plan	PAIA Request	Statutory Requirement	Organisation
	Memorandum of Incorporation	PAIA Request	Statutory Requirement	Organisation
	Minutes of Board / Directors Meetings	PAIA Request	Statutory Requirement	Organisation
	Register of Members	PAIA Request	Statutory Requirement	Organisation
	Register of Board of Directors	PAIA Request	Statutory Requirement	Organisation
	Internal Correspondence (emails/memos)	PAIA Request	Internal Communications	Employees
	Insurance Policies held by organisation	PAIA Request	Risk Management	Organisation
	Employment Applications	PAIA Request	Internal Referencing	Employees
	Employment Contracts	PAIA Request	Contractual Agreement	Employees
Human Resources	Personal Information of Employees	PAIA Request	Internal Referencing	Employees
	Employment Equity Plan	PAIA Request	Statutory Requirement	Organisation
	Medical Aid Records	PAIA Request	Internal Referencing	Employees
	Pension Fund Records	PAIA Request	Internal Referencing	Employees
	Disciplinary Records	PAIA Request	Statutory Requirement	Employees
	Performance Management Records	PAIA Request	Internal Referencing	Employees
	Salary Records	PAIA Request	Internal Referencing	Employees
	Employee Benefit Records	PAIA Request	Internal Referencing	Employees
	PAYE Records	PAIA Request	Statutory Requirement	Employees

Category	Record	Availability	Purpose	Data Subject
	SETA Records	PAIA Request	Statutory Requirement	Employees
	Disciplinary Code	PAIA Request	Statutory Requirement	Organisation
	Leave Records	PAIA Request	Internal Referencing	Employees
	Training Records	PAIA Request	Internal Referencing	Employees
	Training Manual	PAIA Request	Internal Referencing	Organisation
Financial	Financial Statements	PAIA Request	Internal Referencing	Organisation
	Financial and Tax Records	PAIA Request	Statutory Requirement	Organisation
	Asset Register	PAIA Request	Internal Referencing	Organisation
	Management Accounts and Reports	PAIA Request	Internal Referencing	Organisation
	Vouchers, Cash Books and Ledgers	PAIA Request	Internal Referencing	Organisation
	Banking Records and Statements	PAIA Request	Internal Referencing	Organisation
	Electronic Banking Records	PAIA Request	Internal Referencing	Organisation
Marketing	Market Information	PAIA Request	Internal Referencing	Organisation
	Product Brochures	PAIA Request	Internal Referencing	Organisation
	Advertisements	PAIA Request	Internal Referencing	Organisation
	Field Records	PAIA Request	Internal Referencing	Organisation
	Performance Records	PAIA Request	Internal Referencing	Organisation
	Product / Service Sales Records	PAIA Request	Internal Referencing	Organisation
	Marketing Strategies	PAIA Request	Internal Referencing	Organisation
Client / Customer	Customer / Client Database	PAIA Request	Internal Referencing	Customers
	Customer / Client Agreements	PAIA Request	Internal Referencing	Customers
	Customer / Client Files	PAIA Request	Internal Referencing	Customers
	Customer / Client Instructions	PAIA Request	Internal Communications	Customers
	Customer / Client Correspondence	PAIA Request	External Communications	Customers
Third Party	Rental Agreements	PAIA Request	Contractual Agreement	Third Party
	Franchise Agreements	PAIA Request	Contractual Agreement	Third Party
	Non-disclosure Agreements	PAIA Request	Risk Management	Third Party
	Letters of Intent	PAIA Request	Contractual Agreement	Third Party
	Supplier Contracts	PAIA Request	Contractual Agreement	Third Party

Head Signature: _____ Date: 25 May 2026

ANNEXURE E: Request for Access to Record

NOTE:

- Proof of identity must be attached by the requester.
- If the request is made on behalf of another person, proof of such authorisation must be attached to this form.

TO: The Information Officer

21A Westlake Lifestyle Centre, Westlake Drive, Tokai, 7945

Email: compliance@tappipay.co.za

Personal Information

Full Names	
Identity Number	
Capacity (if making request on behalf of another person)	
Postal Address	
Street Address	
E-mail Address	
Contact Numbers (Tel)	
Contact Numbers (Cell / Fax)	

If Making Request on Behalf of Another Person

Full Names of Person	
Identity Number	
Postal Address	
Street Address	
E-mail Address	
Contact Numbers	

Particulars of Record Requested

Provide full particulars of the record to which access is requested, including the reference number if known, to enable the record to be located. If space is inadequate, please continue on a separate page and attach it to this form (all additional pages must be signed).

Description of record or relevant part of the record	
Reference number (if available)	
Any further particulars of record	

Type of Record — Mark applicable box with an "X"

☐	Record is in written or printed form
☐	Record comprises virtual images (photographs, slides, video recordings, computer-generated images, sketches, etc.)
☐	Record consists of recorded words or information which can be reproduced in sound
☐	Record is held on a computer or in an electronic, or machine-readable form

Form of Access — Mark applicable box with an "X"

☐	Printed copy of record (including copies of any virtual images, transcriptions and information held on computer or in electronic form)
☐	Written or printed transcription of virtual images
☐	Transcription of soundtrack (written or printed document)
☐	Copy of record on flash drive (including virtual images and soundtracks)
☐	Copy of record on compact disc (including virtual images and soundtracks)
☐	Copy of record saved on cloud storage server

Manner of Access — Mark applicable box with an "X"

☐	Personal inspection of record at registered address of private body
☐	Postal services to postal address
☐	Postal services to street address
☐	Courier service to street address
☐	Facsimile of information in written or printed format (including transcriptions)

	E-mail of information (including soundtracks if possible)
	Cloud share / file transfer
Preferred Language	

Particulars of Right to be Exercised or Protected

Indicate which right is to be exercised or protected	
Explain why the record requested is required for the exercise or protection of the aforementioned right	

Fees

- a) A request fee must be paid before the request will be considered.
b) You will be notified of the amount of the access fee to be paid.
c) The fee payable for access to a record depends on the form in which access is required and the reasonable time required to search for and prepare a record.
d) If you qualify for exemption of the payment of any fee, please state the reason for exemption

Reason for fee exemption (if applicable)	
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You will be notified in writing whether your request has been approved or denied and if approved, the costs relating to your request, if any. Please indicate your preferred manner of correspondence:

Postal Address	Facsimile	Electronic Communication (please specify)
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Signed at _____ this _____ day of _____ 20 ____

Signature of Requester / Person on whose behalf request is made

FOR OFFICIAL USE ONLY

Reference number:	
Request received by (Name & Surname of Information Officer):	
Date received:	
Access fees:	
Deposit (if any):	

Signature of Information Officer

ANNEXURE F: Prescribed Fees

The following applies to requests (other than personal requests):

- A requester is required to pay a preliminary request fee before a request will be processed.
- If the preparation of the record requested requires more than the prescribed six hours, an additional deposit shall be paid (of not more than one third of the access fee which would be payable if the request was granted).
- A requestor may lodge an application with a court against the tender/payment of the request fee and/or deposit.
- Records may be withheld until the fees have been paid.

No.	Description	Fee
1.	The request fee payable by every requester	R140.00
2.	Photocopy / printed black & white copy of A4-size page	R2.00
3.	Printed copy of an A4-size page	R2.00
4a.	Copy in computer-readable form – Flash drive (to be provided by requester)	R40.00
4b.	Copy in computer-readable form – Compact disc (if provided by requestor)	R40.00
4c.	Copy in computer-readable form – Compact disc (if provided to requestor)	R60.00
5.	Transcription of visual images per A4-size page	Service outsourced – subject to service provider quotation
6.	Copy of visual images	–
7.	Transcription of an audio record, per A4-size page	R24.00
8a.	Copy of audio record – Flash drive (to be provided by requester)	R40.00
8b.	Copy of audio record – Compact disc (if provided by requestor)	R40.00
8c.	Copy of audio record – Compact disc (if provided to requestor)	R60.00
9.	Search and preparation of record per hour (excluding first hour) – maximum total cost	R145.00 per hour / R435.00 total
10.	Deposit (if search exceeds 6 hours)	One third of total amount per request (items 2–8)
11.	Postage, e-mail or any other electronic transfer	Actual expense, if any

ANNEXURE G: Processing of Personal Information

Head Signature: _____ Date: 25 May 2026

PURPOSE OF PROCESSING PERSONAL INFORMATION

TappiPay processes personal information for the purpose of onboarding, verifying and administering its merchant and agent relationships, conducting KYC, fraud prevention, sanctions and compliance screening, facilitating payment processing and settlement services, managing operational and regulatory obligations, maintaining records and monitoring transactions for suspicious or unusual activity.

Personal information collected may include merchant, agent, director, shareholder and authorised representative information required to comply with applicable laws including FICA, POPIA, PASA requirements and sponsoring bank obligations.

TappiPay does not establish a direct customer relationship with end consumers making payments, as consumers remain the clients of their respective banks and payment service providers. Consumer payment information processed by TappiPay is limited to what is necessary to facilitate payment processing, transaction validation, reconciliation, fraud monitoring and dispute management.

CATEGORIES OF DATA SUBJECTS & INFORMATION PROCESSED

Categories of Data Subjects	Personal Information That May Be Processed
Customers / Merchants	Name, surname, trading name, address, contact details, registration numbers, identity/passport numbers, date of birth, business type, turnover, bank account details, branch codes, tax numbers, proof of address, source of funds information, transaction history, merchant category, sanctions and screening results
Merchant Directors / Shareholders / UBO	Names, identity/passport numbers, residential addresses, contact details, ownership percentages, company positions, KYC documentation, sanctions and PEP screening results
Agents	Names, identity numbers, contact details, banking details, onboarding records, training records, commission information, background screening results, performance records
Service Providers	Contact persons, registration numbers, VAT numbers, addresses, bank details, contracts, invoices, confidential business information and trade secrets
Employees	Names, addresses, identity numbers, qualifications, employment history, race, gender, payroll information, banking details, tax numbers, medical aid and pension information, leave records, disciplinary records, next of kin information
Payment Users	Limited transaction-related information including payer reference numbers, bank details linked to transactions, payment confirmations, device/IP information and dispute information where applicable
Banking and Strategic Partnerships	Contact details, authorised signatory information, compliance documentation, agreements, correspondence and operational information
Web and App Users	IP addresses, cookies, login credentials, device information, location data, usage analytics and communication preferences

RECIPIENTS OF PERSONAL INFORMATION

Category of Personal Information	Recipients or Categories of Recipients
Identity number and names, for criminal checks	South African Police Services
Qualifications, for qualification verifications	South African Qualifications Authority
Credit and payment history, for credit information	Credit Bureaus
KYC or client personal information	Authorised Dealer request for Financial Intelligence Centre
Bank account details	System operator for bank account verification

PLANNED TRANSBORDER FLOWS OF PERSONAL INFORMATION

Certain personal information processed by the Company may be stored or hosted on secure cloud-based systems and servers located outside the Republic of South Africa. Where personal information is transferred internationally or stored in foreign jurisdictions, the Company will take reasonable steps to ensure that such information is protected in accordance with the requirements of the Protection of Personal Information Act, 4 of 2013 ("POPIA"). This includes ensuring that cloud service providers and third-party operators implement appropriate technical and organisational security safeguards, confidentiality obligations, access controls and data protection standards comparable to those required under South African law. The Company will only transfer or store personal information outside South Africa where permitted by applicable legislation and where adequate protection measures are in place.

GENERAL DESCRIPTION OF INFORMATION SECURITY MEASURES

The Company implements and maintains appropriate, reasonable technical and organisational security measures to protect personal information against loss, misuse, unauthorised access, disclosure, alteration or destruction. These safeguards include, but are not limited to:

- Secure password-controlled systems;
- User access controls based on role and responsibility;
- Multi-factor authentication where applicable;
- Encrypted data transmission and storage;
- Firewall protection, anti-virus and anti-malware software;
- Secure cloud hosting environments;
- Regular system monitoring, data backup and recovery procedures; and
- Ongoing software and security updates.

Access to personal information is restricted to authorised personnel and service providers who require such access for legitimate business purposes and who are subject to confidentiality obligations. The Company also takes reasonable steps to ensure that third-party operators and service providers processing personal information on its behalf maintain adequate security safeguards aligned with the requirements of POPIA.

ANNEXURE H: Outcome of Request and of Fees Payable

Note:

1. If your request is granted the – (a) amount of the deposit, (if any), is payable before your request is processed; and (b) requested record/portion of the record will only be released once proof of full payment is received.
2. Please use the reference number hereunder in all future correspondence.

Reference Number

TO: _____

Your request dated _____ refers.

You Requested:

Personal inspection of information at registered address of private body (including listening to recorded words, information which can be reproduced in sound, or information held on computer or in electronic form) – free of charge. You are required to make an appointment for the inspection and to bring this form with you. If you then require any form of reproduction, you will be liable for the fees prescribed in Annexure F.
Printed copies of the information
Written or printed transcription of virtual images
Transcription of soundtrack (written or printed document)
Copy of information on flash drive
Copy of information on compact disc
Copy of record saved on cloud storage server

To Be Submitted:

Postal services to postal address
Postal services to street address
Courier service to street address
Facsimile (including transcriptions)
E-mail (including soundtracks if possible)
Cloud share / file transfer

Preferred Language

Kindly note that your request has been:

Approved

Denied, for the following reasons:

Reason for denial (if applicable)	
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Fees Payable With Regards to Your Request

Item	Cost per A4-size page or part thereof / item	Number of pages / items	Total
Photocopy			
Printed copy			
Copy in computer-readable form – Flash drive (provided by requestor)	R40.00		
Copy in computer-readable form – Compact disc (provided by requestor)	R40.00		
Copy in computer-readable form – Compact disc (provided to requestor)	R60.00		
Transcription of visual images per A4-size page	Service outsourced – subject to service provider quotation		
Copy of visual images			
Transcription of an audio record per A4-size page	R24.00		
Copy of audio record – Flash drive (provided by requestor)	R40.00		
Copy of audio record – Compact disc (provided by requestor)	R40.00		
Copy of audio record – Compact disc (provided to requestor)	R60.00		
Postage, e-mail or any other electronic transfer	Actual costs		
TOTAL			

Deposit Payable (If Search Exceeds Six Hours)

Deposit required?	Yes	No	Hours of search:	Amount of deposit (one third of total):	
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Payment Must Be Made to the Following Bank Account:

Name of Bank	
Name of Account Holder	
Type of Account	

Account Number	
Branch Code	
Reference Number	
Submit Proof of Payment to	

Signed at _____ this _____ day of _____ 20 ____

Signature of Information Officer