



COMPLAINTS PROCESS

TPay Complaints Process

Entity	TPPPAY Proprietary Limited
Trading Name	TPay
Registration Number	2025/544950/07
Website	www.tppp.africa
Version	Version 1.1
Effective Date	15 May 2026
Classification	Complaints Handling and Service Governance Document
Scope	Complaints handling, complaint routing and escalation process

Publication Note: This document governs TPay's complaints handling process and explains the correct routing of general complaints, payment complaints, service complaints, privacy complaints and PAIA-related complaints.

DOCUMENT CONTROL

Field	Detail
Document Title	Complaints Process
Alternative Name	TPay Complaints Process
Entity	TPPPAY Proprietary Limited
Trading Name	TPay
Registration Number	2025/544950/07
Website	www.tppp.africa
General Complaints Email	support@tppp.africa
Privacy and PAIA Complaints Email	rgwenzi@tppp.africa
Physical Address	122 Beech Street, Northcliff, Johannesburg, 2195
Version	Version 1.1
Effective Date	15 May 2026
Review Cycle	Annual or as required
Document Owner	Ronald Gwenzi
Approved By	Board
Classification	Complaints Handling and Service Governance Document

Purpose: This document explains how consumers, payers, merchants, website users, data subjects and other affected persons may lodge complaints with TPay. It distinguishes between general complaints, which must be submitted through the TPay Complaint Form or support@tppp.africa, and privacy, POPIA or PAIA-related complaints, which must be submitted through the TPay Privacy and PAIA Complaint Form or rgwenzi@tppp.africa. It also explains how complaints are acknowledged, assessed, investigated, escalated and closed. This document forms part of TPay’s website and service policy framework and should be read together with TPay’s Terms of Website Use, Payment Service Terms, Privacy Policy and PAIA Manual, where applicable.

TABLE OF CONTENTS

Section	Title	Page
1	Introduction and Scope	4
2	Definitions and Interpretation	4
3	Complaint Channels and Form Routing	5
4	How to Lodge a General Complaint	6
5	How to Lodge a Privacy or PAIA Complaint	6
6	Information Required from the Complainant	7
7	Acknowledgement of Complaint	8
8	Initial Assessment and Classification	8
9	Response Timelines	8
10	Payment-Related Complaints	9
11	PASA and National Payment System Alignment	9
12	Merchant-Related Complaints	10
13	Fraud, Unauthorised Use and Urgent Complaints	10
14	Privacy Complaints	10
15	PAIA and Access-to-Information Complaints	10
16	Investigation Process	11
17	Complaint Outcomes	11
18	Internal Escalation Process	11
19	Recordkeeping	12
20	Confidentiality and Personal Information	12
21	Use of Incorrect Form or Incorrect Channel	12
22	Unreasonable, Abusive or Vexatious Complaints	13
23	External Remedies	13
24	Changes to this Complaints Process	13
25	Contact Details	13

COMPLAINTS PROCESS

TPay Complaints Process

Complaints Process Notice: This Complaints Process explains how complaints are submitted to TPay, how TPay distinguishes between general complaints and privacy or PAIA-related complaints, how complaints are acknowledged and assessed, and how payment-related, merchant-related, service-related, fraud-related, privacy-related and PAIA-related complaints are escalated and resolved where possible.

1. Introduction and Scope

1.1 This Complaints Process applies to complaints submitted to TPay Proprietary Limited, registration number 2025/544950/07, trading as TPay.

1.2 This process applies to general service complaints, payment-related complaints, merchant-related payment complaints, refund or return-related payment support complaints, website-related complaints, technical complaints, suspected fraud or unauthorised use complaints, operational complaints, privacy and POPIA complaints, and PAIA or access-to-information complaints.

1.3 Although this document covers all complaint categories at a policy level, different complaint forms and email routes apply depending on the nature of the complaint.

1.4 The TPay Complaint Form is the general complaint form. The TPay Privacy and PAIA Complaint Form is the specialised form for privacy, POPIA and PAIA-related complaints.

1.5 Some complaints may involve a merchant, bank, payment participant, payment system operator, card scheme, regulator, law enforcement authority or other third party. TPay will handle complaints within its control and may guide or route the complainant to the appropriate party where the matter falls outside TPay’s control.

2. Definitions and Interpretation

Term	Meaning
Bank	means a South African bank or financial institution involved in a payment, bank account, authentication or payment processing matter.
Business Day	means any day other than a Saturday, Sunday or official public holiday in the Republic of South Africa.
Complainant	means a person who lodges a Complaint with TPay.
Complaint	means a written expression of dissatisfaction, concern or dispute relating to TPay, the Payment Service, a payment instruction, privacy, website use or a related operational matter.
General Complaint	means a written expression of dissatisfaction relating to TPay’s Payment Service, service support, website use, technical functionality, payment support, merchant-related payment issue, suspected fraud, unauthorised use or operational matter, excluding complaints that are specifically about POPIA rights, PAIA access requests or personal information rights.
Privacy and PAIA Complaint	means a written expression of dissatisfaction relating to privacy rights, personal information processing, POPIA objections, correction or deletion requests, access to personal information, PAIA access-to-record requests, delayed PAIA responses, refused PAIA requests, suspected unauthorised disclosure or related

Term	Meaning
	information rights.
Consumer	means a person who uses, or seeks to use, the Payment Service as a payer.
Data Subject	means a person to whom personal information relates, as contemplated under POPIA.
Merchant	means a business or other person that offers goods or services and may accept payments through the Payment Service.
Payment Instruction	means an instruction initiated or authorised by a Consumer to make a payment from a bank account or approved payment source.
Payment Service	means the TPay payment facilitation service that enables Consumers to initiate or authorise payment instructions through approved payment flows.
PASA	means the Payments Association of South Africa.
POPIA	means the Protection of Personal Information Act, 4 of 2013.
Privacy Complaint	means a Complaint relating to personal information, privacy rights, POPIA or suspected unauthorised disclosure.
PAIA Complaint	means a Complaint relating to access-to-information rights, PAIA requests, delayed PAIA responses or refused PAIA requests.
Service Complaint	means a Complaint relating to support, access, operational handling, website functionality or related service issues.
TPay	means TPPPAY Proprietary Limited, registration number 2025/544950/07, trading as TPay.
Transaction	means a payment-related transaction initiated through the Payment Service.
we, us, our	means TPay.
you, your	means the Complainant or relevant user, as the context requires.

3. Complaint Channels and Form Routing

Important routing principle: The TPay Complaint Form is the general complaint form and should not be treated as a POPIA or PAIA statutory complaint form. Privacy, POPIA and PAIA-related complaints should be submitted through the TPay Privacy and PAIA Complaint Form or sent to rgwenzi@tppp.africa.

Complaint Type	Correct Form	Correct Email	Examples
General service, operational or website complaint	TPay Complaint Form	support@tppp.africa	Website issue, service delay, technical problem, support issue
Payment-related complaint	TPay Complaint Form	support@tppp.africa	Failed payment, duplicate payment, incorrect amount, payment not reflected
Merchant-related payment complaint	TPay Complaint Form	support@tppp.africa	Refund support, return-related payment query, merchant payment issue
Fraud or unauthorised use complaint	TPay Complaint Form	support@tppp.africa	Suspected fraudulent transaction, compromised banking credentials, unauthorised payment concern
Privacy or POPIA complaint	TPay Privacy and PAIA Complaint Form	rgwenzi@tppp.africa	Objection to processing, correction or deletion complaint, unauthorised disclosure
PAIA or access-to-information complaint	TPay Privacy and PAIA Complaint Form	rgwenzi@tppp.africa	Delayed PAIA response, refused access request, access-to-record complaint

3.1 If a complainant uses the TPay Complaint Form only, TPay will treat the matter as a general complaint unless the content of the complaint clearly indicates that it relates to POPIA, PAIA, personal information rights or access-to-information rights.

3.2 The TPay Privacy and PAIA Complaint Form is the appropriate form for complaints relating to POPIA, personal information, privacy rights, correction or deletion of personal information, objections to processing, PAIA access-to-record requests, delayed PAIA responses or refused access requests.

3.3 Where a complaint is submitted using the incorrect form or to the incorrect email address, TPay may internally route the matter to the appropriate function or request the complainant to complete the correct form. TPay will not reject a complaint solely because the wrong form was used, but the use of the correct form may assist TPay to assess and respond more efficiently.

4. How to Lodge a General Complaint

4.1 General complaints must be submitted using the TPay Complaint Form or by email to support@tppp.africa.

4.2 General complaints include payment-related complaints, failed payments, duplicate payments, incorrect amount complaints, payment not reflected by merchant, unauthorised or suspected fraudulent transaction concerns, merchant-related issues, refund or return-related support issues, website issues, technical issues, service or support issues and operational complaints.

4.3 The TPay Complaint Form is recommended because it captures the information required to assess general complaints efficiently.

Routing note: The TPay Complaint Form is not the preferred form for POPIA, PAIA or personal information rights complaints. These matters should be submitted using the TPay Privacy and PAIA Complaint Form.

5. How to Lodge a Privacy or PAIA Complaint

5.1 Privacy, POPIA and PAIA-related complaints must be submitted using the TPay Privacy and PAIA Complaint Form or by email to rgwenzi@tppp.africa.

5.2 Privacy and PAIA complaints include POPIA objection issues, correction or deletion request issues, access to personal information issues, PAIA access request issues, delayed PAIA responses, refused access requests, personal information security concerns, suspected unauthorised disclosure, inaccurate personal information, privacy complaints linked to the Payment Service, or complaints relating to how TPay handled a PAIA or POPIA request.

5.3 The TPay Privacy and PAIA Complaint Form is an internal TPay complaint form and is not the Information Regulator's external Form 05.

5.4 Dissatisfied complainants may have external remedies under PAIA or POPIA, including approaching the Information Regulator of South Africa where applicable.

6. Information Required from the Complainant

6.1 Information required for general complaints

- full name, email address and contact number
- complainant type
- merchant name, where applicable
- transaction date, where applicable
- transaction amount, where applicable
- bank used, where applicable
- payment or transaction reference, where available
- clear description of the complaint
- outcome requested
- supporting documents, where available

6.2 Information required for privacy and PAIA complaints

- full name, email address and contact number
- identity number or company registration number, where applicable
- complainant type
- relevant POPIA, PAIA or privacy issue
- previous request reference, where available
- date previous request was submitted, where applicable
- personal information or record involved
- prior response received from TPay, where applicable
- reason for dissatisfaction
- outcome requested
- proof of identity or authority to act, where applicable
- supporting documents

7. Acknowledgement of Complaint

7.1 TPay will acknowledge receipt of a complaint within 2 Business Days after receipt, where sufficient contact details have been provided.

7.2 The acknowledgement may include confirmation that the complaint was received, a complaint reference number where available, identification of the complaint route, whether the matter is being treated as a general complaint or a privacy and PAIA complaint, a request for additional information if required, and confirmation if the complaint has been internally routed to another function.

8. Initial Assessment and Classification

8.1 TPay will assess the complaint to determine whether it is a general complaint, payment-related complaint, merchant-related complaint, bank-related matter, suspected fraud or unauthorised use complaint, technical or website complaint, privacy or POPIA complaint, PAIA or access-to-information complaint, or a matter outside TPay’s control.

8.2 If a complainant submits a TPay Complaint Form and the content clearly relates to privacy, POPIA or PAIA, TPay may reclassify the matter as a Privacy and PAIA Complaint and may request that the complainant complete the TPay Privacy and PAIA Complaint Form if additional information is required.

8.3 If a complainant submits a Privacy and PAIA Complaint Form for a matter that is purely payment, merchant, service or technical in nature, TPay may reclassify the matter as a General Complaint and route it to support@tppp.africa.

9. Response Timelines

Stage	Target Timeline
Acknowledge complaint	Within 2 Business Days
Classify complaint route	Within 5 Business Days
Request missing information	Within 5 Business Days, where required
Initial assessment	Within 5 Business Days after sufficient information is received
Standard response	Within 10 Business Days after sufficient information is received
Complex complaint response	Within 20 Business Days after sufficient information is received
Further extension	TPay must notify the complainant and explain the reason for the delay

9.1 Timelines may be affected where TPay requires information from a Bank, merchant, payment partner, payment participant, regulator, law enforcement authority, external adviser or other third party.

9.2 Statutory PAIA or POPIA timelines may apply separately where the complaint relates to a formal PAIA request or a POPIA rights request.

10. Payment-Related Complaints

10.1 Payment-related complaints may include an incorrect payment amount, duplicate payment, payment not reflected by a merchant, payment status query, failed payment, unauthorised payment concern, suspected fraud, delayed payment confirmation, or incorrect merchant or reference details.

10.2 Payment-related complaints should generally be submitted using the TPay Complaint Form to support@tppp.africa.

10.3 TPay may investigate the payment-related information available to it and may engage with the merchant, Bank, payment partner or relevant participant where appropriate.

10.4 TPay cannot override bank-controlled authentication, bank statements, bank dispute processes, settlement rules or payment system rules.

11. PASA and National Payment System Alignment

11.1 TPay operates within the South African payment environment and recognises that payment-related complaints may involve payment instructions, Banks, clearing participants, settlement participants, payment system operators, system operators, merchants and other regulated or authorised payment participants.

11.2 Complaints involving payment instructions, clearing, settlement or bank-controlled processes may need to be handled with reference to applicable Bank rules, payment system rules, participant obligations, sponsor bank requirements and PASA-related frameworks, where applicable.

11.3 Where escalation to a Bank, sponsor bank, clearing participant, settlement participant, PASA structure, regulator or other payment-system body is required, TPay will assess the complaint and take reasonable steps to route or escalate the matter through the appropriate channel available to TPay.

11.4 This Complaints Process does not replace any Bank dispute process, merchant refund process, card scheme process, statutory complaint process or other payment-system process that may apply.

11.5 This policy does not state or imply that PASA directly accepts or resolves consumer complaints unless this is confirmed by applicable PASA rules or participant arrangements.

12. Merchant-Related Complaints

12.1 Complaints about goods, services, delivery, cancellation, refunds, returns or merchant conduct must first be raised with the relevant merchant.

12.2 TPay may assist with payment-related information where appropriate but does not assume responsibility for the merchant's products, services, delivery or refund obligations unless expressly required by law or written agreement.

12.3 Merchant-related payment support complaints should generally be submitted using the TPay Complaint Form.

13. Fraud, Unauthorised Use and Urgent Complaints

13.1 Suspected fraud, unauthorised use, compromised credentials, suspicious transactions or suspected unlawful payment activity should be reported as soon as possible.

13.2 Urgent fraud or unauthorised use complaints should generally be submitted using the TPay Complaint Form and sent to support@tppp.africa.

13.3 Complainants should also contact their Bank immediately where a bank account, banking credentials, card, device or authentication method may have been compromised.

13.4 TPay may prioritise urgent complaints involving fraud, security risk, unauthorised transactions or legal risk.

14. Privacy Complaints

14.1 Privacy complaints may include concerns about personal information processing, objection to processing, correction or deletion request dissatisfaction, access to personal information concerns, withdrawal of consent where applicable, suspected unauthorised disclosure, suspected personal information security incident, inaccurate personal information or a privacy complaint linked to the Payment Service.

14.2 Privacy complaints must be submitted using the TPay Privacy and PAIA Complaint Form or sent to rgwenzi@tppp.africa.

14.3 Privacy complaints will be handled in accordance with the TPay Privacy Policy and POPIA, where applicable.

14.4 If the complainant remains dissatisfied, the complainant may have the right to approach the Information Regulator of South Africa in accordance with POPIA.

15. PAIA and Access-to-Information Complaints

15.1 PAIA and access-to-information complaints may include delayed response to a PAIA request, refused access request, dissatisfaction with the outcome of a PAIA request, concerns regarding PAIA fees where applicable, or concerns regarding access to records held by TPay.

15.2 PAIA and access-to-information complaints must be submitted using the TPay Privacy and PAIA Complaint Form or sent to rgwenzi@tppp.africa.

15.3 Formal requests for access to records must still be handled in accordance with the TPay PAIA Manual and PAIA.

15.4 If a complaint relates to a refused or delayed PAIA request, the complainant may have remedies under PAIA, including approaching the Information Regulator or a court, where applicable.

16. Investigation Process

16.1 TPay may investigate a complaint by reviewing internal records, reviewing transaction information available to TPay, reviewing support communications, requesting further information from the complainant, engaging with the merchant where appropriate, engaging with the Bank, payment partner or relevant payment participant where appropriate, reviewing system logs where applicable, reviewing applicable terms, policies, payment rules or agreements, and escalating internally to support, operations, compliance, risk, technical, privacy or management functions.

16.2 The investigation route will depend on whether the complaint is a general complaint or a privacy and PAIA complaint.

17. Complaint Outcomes

17.1 Possible outcomes may include an explanation provided to the complainant, payment status clarification, referral to a merchant, referral to a Bank, technical issue escalation, correction of information, privacy request handling, PAIA request handling, fraud escalation, internal corrective action, confirmation that no further action can be taken by TPay, or escalation to an external channel where applicable.

18. Internal Escalation Process

Stage	General Complaint Route	Privacy and PAIA Complaint Route
Stage 1	Complaint received through TPay Complaint Form or support@tppp.africa	Complaint received through TPay Privacy and PAIA Complaint Form or rgwenzi@tppp.africa
Stage 2	Complaint assessed by support or operations	Complaint assessed by privacy, PAIA or authorised responsible person
Stage 3	If unresolved or complex, escalated to technical, risk, compliance or management	If unresolved or complex, escalated to Information Officer, privacy function, compliance or management

Stage	General Complaint Route	Privacy and PAIA Complaint Route
Stage 4	If involving Bank, merchant, payment partner or payment participant, routed through appropriate available channel	If involving POPIA, PAIA or legal rights, handled with reference to Privacy Policy, PAIA Manual, POPIA, PAIA and applicable remedies
Stage 5	Final response issued to complainant	Final response issued to complainant

18.1 Escalation does not guarantee a particular outcome, especially where the issue depends on a Bank, merchant, payment system, regulator, Information Regulator, court, law enforcement authority or other third party.

19. Recordkeeping

19.1 TPay will maintain complaint records for a period reasonably required for complaint management, audit and compliance, fraud prevention, legal and regulatory requirements, privacy and PAIA compliance, risk management, operational improvement and evidence of response.

19.2 Complaint records may include correspondence, supporting documents, transaction references, internal notes, decisions, classification records, escalation records and final outcomes.

20. Confidentiality and Personal Information

20.1 Personal information submitted as part of a complaint will be processed in accordance with TPay’s Privacy Policy.

20.2 Complaint information may be shared with merchants, Banks, service providers, payment partners, regulators, law enforcement authorities, advisers, the Information Regulator or other third parties where reasonably required to investigate or resolve the complaint, comply with law, or protect rights and security.

20.3 Privacy and PAIA complaints may involve more sensitive personal information and should therefore be routed through the Privacy and PAIA Complaint channel where applicable.

21. Use of Incorrect Form or Incorrect Channel

Key interpretation rule: TPay will not treat a general complaint as a statutory POPIA or PAIA complaint merely because the complainant is a data subject, consumer, payer, merchant or website user. The substance of the complaint will determine the complaint route.

21.1 If a complainant uses the TPay Complaint Form only, TPay will treat the matter as a general complaint unless the information provided clearly indicates that the matter relates to POPIA, PAIA, personal information rights or access-to-information rights.

21.2 If a complainant uses the TPay Complaint Form for a privacy, POPIA or PAIA-related matter, TPay may internally route the matter to the appropriate privacy or PAIA function or request that the complainant complete the TPay Privacy and PAIA Complaint Form.

21.3 If a complainant uses the TPay Privacy and PAIA Complaint Form for a matter that is clearly a general payment, merchant, website, technical, service or operational complaint, TPay may internally route the matter to support or request that the complainant complete the TPay Complaint Form.

21.4 Use of the incorrect form may delay assessment where TPay requires additional information to classify, investigate or respond to the complaint.

21.5 TPay will not treat a general complaint as a statutory POPIA or PAIA complaint merely because the complainant is a data subject, consumer, payer, merchant or website user. The substance of the complaint will determine the complaint route.

22. Unreasonable, Abusive or Vexatious Complaints

22.1 TPay may restrict or manage communications where a complaint is abusive, threatening, fraudulent, repetitive, vexatious or made in bad faith.

22.2 TPay will still consider genuine complaints fairly.

23. External Remedies

23.1 Nothing in this Complaints Process prevents a complainant from using external remedies available under applicable law.

23.2 External channels may include, where applicable, the complainant’s Bank, the relevant merchant, the Information Regulator for POPIA or PAIA matters, a relevant regulator, law enforcement authorities, a court or tribunal with jurisdiction, or any applicable ombud or consumer dispute channel.

23.3 The Information Regulator’s external Form 05 is not a TPay form and should be obtained from the Information Regulator’s official PAIA Forms section where applicable.

23.4 This Complaints Process does not state or imply that PASA directly accepts or resolves consumer complaints unless this is confirmed by applicable PASA rules or participant arrangements.

24. Changes to this Complaints Process

24.1 TPay may update this Complaints Process from time to time.

24.2 The updated version will apply from the date it is published or from the effective date stated in the updated document.

25. Contact Details

25.1 For complaints or questions about this process, please contact TPay using the details below.

Field	Detail
Entity	TPPPAY Proprietary Limited
Trading Name	TPay
Registration Number	2025/544950/07
Website	www.tppp.africa
General Complaints	support@tppp.africa
Privacy, POPIA and PAIA Complaints	rgwenzi@tppp.africa
Address	122 Beech Street, Northcliff, Johannesburg, 2195