



TPay

Trusted

PAIA MANUAL

TPay PAIA Manual

Prepared in terms of section 51 of the Promotion of Access to Information Act, 2 of 2000, as amended

Entity	TPPPAY Proprietary Limited
Trading Name	TPay
Registration Number	2025/544950/07
Website	www.tppp.africa
Version	Version 1.0
Effective Date	15 May 2026
Date of Compilation	15 May 2026
Date of Revision	15 May 2026
Classification	Access to Information and POPIA Governance Document

Publication Note: This document explains how requesters may request access to TPay records under PAIA and how TPay addresses related POPIA information requirements.

DOCUMENT CONTROL

Field	Detail
Document Title	PAIA Manual
Alternative Name	TPay PAIA Manual
Entity	TPPPAY Proprietary Limited
Trading Name	TPay
Registration Number	2025/544950/07
Website	www.tppp.africa
Contact Email	support@tppp.africa
Physical Address	122 Beech Street, Northcliff, Johannesburg, 2195
Version	Version 1.0
Effective Date	15 May 2026
Date of Compilation	15 May 2026
Date of Revision	15 May 2026
Review Cycle	Annual or as required
Document Owner	Ronald Gwenzi
Approved By	Board
Prepared in terms of	Section 51 of PAIA

Purpose: This PAIA Manual explains how requesters may request access to records held by TPay in accordance with the Promotion of Access to Information Act, 2 of 2000, as amended, and how TPay addresses related personal information processing disclosures under POPIA. It 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 Complaints Process, where applicable.

TABLE OF CONTENTS

- 1. List of Acronyms and Abbreviations 4
- 2. Purpose of this PAIA Manual 4
- 3. Key Contact Details for Access to Information 4
- 4. Guide on How to Use PAIA and How to Obtain Access to the Guide 4
- 5. Categories of Records Available Without a Formal PAIA Request 5
- 6. Description of Records Available in Accordance with Other Legislation 5
- 7. Description of Subjects on Which TPay Holds Records and Categories of Records Held 5
- 8. Processing of Personal Information 6
- 9. Availability of the Manual 7
- 10. Request Procedure 7
- 11. Fees 7
- 12. Remedies and Complaints 7
- 13. Updating of the Manual 7
- 14. Contact Details 8
- 15. Approval and Issue 8

PAIA MANUAL

TPay PAIA Manual

PAIA Notice: This PAIA Manual has been prepared for TPPPAY Proprietary Limited, trading as TPay, in terms of section 51 of the Promotion of Access to Information Act, 2 of 2000, as amended. It assists requesters to understand what categories of records may be held by TPay, how access to records may be requested, which records may be available without a formal PAIA request, and how TPay processes personal information in accordance with POPIA.

1. List of Acronyms and Abbreviations

Acronym	Meaning
CEO	Chief Executive Officer
DIO	Deputy Information Officer
IO	Information Officer
PAIA	Promotion of Access to Information Act, 2 of 2000, as amended
POPIA	Protection of Personal Information Act, 4 of 2013
Regulator	Information Regulator of South Africa
Republic	Republic of South Africa
TPay	TPPPAY Proprietary Limited, registration number 2025/544950/07, trading as TPay

2. Purpose of this PAIA Manual

2.1 This Manual is intended to assist members of the public and requesters to understand how access to records held by TPay may be requested and how TPay addresses related POPIA information requirements.

2.2 This Manual is useful for requesters to:

- understand the categories of records held by TPay that may be available without submitting a formal PAIA request;
- understand how to request access to a record held by TPay;
- understand the subjects on which TPay holds records and the categories of records held under each subject;
- identify records that may be available in accordance with other legislation;
- access the contact details of the Information Officer or authorised access-to-information contact;
- understand the PAIA Guide issued by the Information Regulator and how to access it;
- understand how TPay processes personal information under POPIA;
- understand the categories of data subjects and categories of personal information processed by TPay;
- understand the recipients or categories of recipients to whom personal information may be supplied;
- understand whether personal information may be transferred outside South Africa; and
- understand the general security measures implemented to protect personal information.

3. Key Contact Details for Access to Information

Field	Detail
Private Body	TPPPAY Proprietary Limited
Trading Name	TPay
Registration Number	2025/544950/07
Information Officer	Ronald Gwenzi
Email	rgwenzi@tppp.africa
General Access to Information Contact	support@tppp.africa
Physical Address	122 Beech Street, Northcliff, Johannesburg, 2195
Website	www.tppp.africa

3.1 No Deputy Information Officer has been designated as at the effective date of this Manual. TPay may update this Manual if a Deputy Information Officer is appointed.

4. Guide on How to Use PAIA and How to Obtain Access to the Guide

4.1 The Information Regulator has, in terms of PAIA, made available a Guide on how to use PAIA. The Guide assists persons who wish to exercise rights under PAIA and POPIA.

4.2 The Guide contains information on:

- the objects of PAIA and POPIA;
- the contact details of Information Officers and Deputy Information Officers;
- the manner and form of requests for access to records;
- assistance available from Information Officers;
- assistance available from the Information Regulator;
- remedies available where a request is refused or not properly dealt with;
- fees payable in relation to access requests; and
- regulations made under PAIA.

4.3 The Guide may be obtained from the Information Regulator of South Africa and may be accessed through the official website of the Information Regulator of South Africa.

5. Categories of Records Available Without a Formal PAIA Request

5.1 The following categories of records may be available without a formal PAIA request, depending on publication status, operational readiness and applicable legal requirements.

Category of Records	Types of Records	Available on Website	Available Upon Request
Website policies	Terms of Website Use, Payment Service Terms, Privacy Policy, PAIA Manual and Complaints Process	Yes, where published	Yes
Public company information	Trading name, registration number, address, website and contact email	Yes, where published	Yes
General service information	General information about TPay services and website content	Yes, where published	Yes
Public notices	Published legal, service, compliance or operational notices	Yes, where published	Yes
Contact information	Public support and access-to-information contact details	Yes	Yes

6. Description of Records Available in Accordance with Other Legislation

6.1 TPay may hold records that are created, retained or made available in accordance with applicable South African legislation, including the legislation listed below.

Category of Records	Applicable Legislation
Memorandum of Incorporation and company registration records	Companies Act, 71 of 2008
Company records and statutory registers	Companies Act, 71 of 2008
Accounting records and financial statements	Companies Act, 71 of 2008
Tax records	Tax Administration Act, 28 of 2011
VAT records, where applicable	Value-Added Tax Act, 89 of 1991
Employment records, where applicable	Basic Conditions of Employment Act, 75 of 1997
Employment equity records, where applicable	Employment Equity Act, 55 of 1998
Skills development records, where applicable	Skills Development Act, 97 of 1998
Compensation records, where applicable	Compensation for Occupational Injuries and Diseases Act, 130 of 1993
Health and safety records, where applicable	Occupational Health and Safety Act, 85 of 1993
PAIA Manual and access request records	Promotion of Access to Information Act, 2 of 2000
Personal information processing records	Protection of Personal Information Act, 4 of 2013
Payment, compliance and risk records, where applicable	Applicable payment system, banking, commercial, tax, anti-fraud or regulatory requirements

7. Description of Subjects on Which TPay Holds Records and Categories of Records Held

7.1 TPay may hold records in relation to the subjects below. The categories of records listed are examples and may vary depending on TPay's operations and applicable legal, contractual and regulatory requirements.

Subject	Categories of Records
Corporate and statutory records	CIPC records; registration documents; company resolutions; governance approvals; statutory registers, where applicable.
Governance records	Board approvals; governance documents; delegated authority records; policy approvals.
Website and policy records	Terms of Website Use; Payment Service Terms; Privacy Policy; PAIA Manual; Complaints Process; website notices.
Merchant records	Merchant onboarding information; merchant contact records; merchant agreements; support correspondence; merchant configuration records, where applicable.
Consumer and payer records	Consumer contact information; payer support records; payment-related identifiers; query and complaint records.
Payment service records	Payment instruction records; transaction reference records; merchant payment information; payment status records; payment-related support records.
Transaction and payment instruction records	Transaction date and time; amount; merchant information; bank or payment method details; status and reference records, where applicable.
Support and complaint records	Support tickets; complaints; correspondence; investigation notes; resolution records.
Privacy and information security records	Privacy Policy; data subject request records; information security policies; access control records; incident records, where applicable.
Compliance and risk records	Fraud prevention records; compliance assessments; regulatory correspondence; risk records; monitoring records, where applicable.
Financial and accounting records	Invoices; payment records; accounting records; management accounts; audit-related records, where applicable.
Tax records	Income tax, VAT and other tax records, where applicable.
Human resources records, where applicable	Employee, officer or contractor records; appointment records; payroll or payment records; training and access records.
Service provider and supplier records	Supplier contracts; service provider contact details; invoices; due diligence records; payment records.
Contracts and legal records	Commercial agreements; legal correspondence; regulatory records; dispute records.
Technology and system records	System logs; access records; configuration records; security monitoring records; technical documentation.
Marketing and communication records	Public communications; website content; marketing preferences and communication records, where applicable.

8. Processing of Personal Information

This section addresses the POPIA-related disclosures that are included in this Manual.

8.1 Purpose of Processing Personal Information

8.1 TPay may process personal information for the following purposes:

- providing and supporting the TPay Payment Service;
- facilitating payment instructions;
- communicating with users, merchants and service providers;
- responding to access-to-information requests;
- responding to privacy requests and complaints;
- verifying transactions;
- fraud prevention and risk management;
- compliance with applicable laws and regulatory obligations;
- maintaining business, accounting and tax records;
- managing contracts and commercial relationships;
- managing website interactions and support processes; and
- protecting TPay's systems, users, merchants, legal rights and business interests.

8.2 Categories of Data Subjects and Personal Information Processed

Categories of Data Subjects	Personal Information That May Be Processed
Consumers and payers	Name; contact details; payment information; transaction information; bank name or payment method details; authentication-related indicators, where applicable; device and IP information; support query details.
Merchants and merchant representatives	Name; contact details; company details; registration information; banking or settlement-related information, where applicable; authorised representative details; contractual and support records.
Website visitors	IP address; device information; browser information; cookie information; website usage information.
Service providers and suppliers	Name; contact details; company registration information; VAT

Categories of Data Subjects	Personal Information That May Be Processed
	number, where applicable; bank details; contract records; payment records.
Employees, officers or contractors, where applicable	Identity and contact details; employment or appointment records; qualifications; role information; remuneration or payment information, where applicable; compliance and security access records.
Regulators, advisers and business contacts	Names; contact details; correspondence; role or organisation details; records relating to regulatory, legal or business communications.

8.3 Recipients or Categories of Recipients

Category of Personal Information	Recipients or Categories of Recipients
Payment and transaction information	Banks; payment partners; merchants; payment system participants, where applicable.
Identity and contact information	Merchants; support providers; verification providers; professional advisers; regulators or lawful authorities, where required.
Fraud and risk information	Banks; fraud prevention service providers; regulators; law enforcement authorities, where required.
Business and contractual information	Service providers; professional advisers; auditors or accounting service providers; legal advisers; commercial counterparties, where applicable.
Website and technical information	Cloud, analytics, cybersecurity and IT support providers.

8.4 Planned Transborder Flows of Personal Information

8.4.1 TPay may process or store personal information in South Africa and may transfer or store personal information outside South Africa where necessary for cloud hosting, technical support, payment processing, analytics, security, business operations, regulatory purposes or lawful service provider arrangements.

8.4.2 Where personal information is transferred outside South Africa, TPay will take reasonable steps to ensure that appropriate safeguards are in place as required by POPIA and applicable law.

8.5 General Description of Information Security Measures

8.5.1 TPay applies reasonable technical and organisational safeguards to protect personal information.

8.5.2 These safeguards may include access controls, password and authentication controls, encryption where applicable, secure cloud environments where applicable, anti-virus and anti-malware tools where applicable, monitoring and logging, incident response processes, restricted access to systems, confidentiality obligations, staff or contractor access controls, backup and recovery measures where applicable, segregation of duties where applicable and periodic review of security controls.

8.5.3 Unless expressly confirmed in a separate public statement or written agreement, nothing in this Manual should be read as a claim that TPay holds a specific certification, bank approval, regulatory status, third-party audit certification or regulatory approval.

9. Availability of the Manual

9.1 This PAIA Manual is available on the TPay website at www.tppp.africa where published, from TPay upon written request, for inspection at TPay's principal office during normal business hours where practically available, and to the Information Regulator upon request.

9.2 A requester may be required to pay the prescribed fee for copies of this Manual or records, where applicable under PAIA and the relevant regulations.

10. Request Procedure

10.1 A requester who wishes to request access to a record must:

- submit the prescribed PAIA request form, where applicable;
- provide sufficient detail to identify the requested record;
- identify the right the requester seeks to exercise or protect, where required under PAIA;
- provide proof of identity or authority to act on behalf of another person, where applicable;
- pay any prescribed fee, where applicable; and
- submit the request to support@tppp.africa.

10.2 TPay may refuse access where PAIA permits or requires refusal, including where disclosure would unlawfully affect privacy, confidentiality, commercial information, legal privilege, security, third-party rights or other protected interests.

11. Fees

11.1 Request fees, access fees, reproduction fees or other prescribed fees may be payable in accordance with PAIA and the regulations.

11.2 TPay will notify the requester if a prescribed fee is payable before processing or providing access, where required.

12. Remedies and Complaints

12.1 If a requester is dissatisfied with TPay's response to a PAIA request, the requester may have remedies under PAIA, including lodging a complaint with the Information Regulator or approaching a court, where applicable.

12.2 Where a separate TPay Complaints Process applies to a particular complaint, that process may also apply where relevant.

13. Updating of the Manual

13.1 TPay will update this PAIA Manual on a regular basis or when there are material changes to its records, processing activities, contact details, legal requirements or operational structure.

14. Contact Details

14.1 For access-to-information requests or questions about this Manual, 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
Email	support@tppp.africa
Address	122 Beech Street, Northcliff, Johannesburg, 2195
Information Officer	Ronald Gwenzi

15. Approval and Issue

15.1 This PAIA Manual is issued for and on behalf of TPPPAY Proprietary Limited, trading as TPay.

Field	Detail
Issued by	Ronald Gwenzi
Capacity	Information Officer / Authorised Representative
For and on behalf of	TPPPAY Proprietary Limited, trading as TPay
Date	15 May 2026
Signature	