



PRIVACY POLICY

TPay Privacy Policy

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Publication Note: This document explains how TPay collects, uses, stores, shares and protects personal information in connection with the TPay website, Payment Service and related interactions.

DOCUMENT CONTROL

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Purpose: This document explains how TPay collects, uses, stores, shares, protects and otherwise processes personal information in connection with the TPay website, the TPay Payment Service, merchant-related interactions, consumer-related interactions and related support processes. 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, PAIA Manual and Complaints Process, where applicable.

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PRIVACY POLICY

TPay Privacy Policy

Privacy Notice: This Privacy Policy explains how TPPPAY Proprietary Limited, trading as TPay, collects, uses, stores, shares, protects and otherwise processes personal information when a person accesses the TPay website, uses the TPay Payment Service, interacts with TPay, submits information to TPay, or communicates with TPay for support, payment, compliance or related purposes.

1. Introduction and Scope

1.1 This Privacy Policy applies to personal information processed by TPPPAY Proprietary Limited, registration number 2025/544950/07, trading as TPay.

1.2 The official TPay website is www.tppp.africa.

1.3 This Privacy Policy applies to Consumers, payers, website visitors, Merchants, prospective Merchants, authorised users, persons who contact TPay, persons who use the TPay Payment Service, and persons whose personal information is provided to TPay in connection with services, Transactions, support, compliance or business operations.

1.4 This Privacy Policy governs personal information processing only.

1.5 This Privacy Policy forms part of TPay's website and service policy framework and should be read together with the following documents, where applicable:

- Terms of Website Use;
- Payment Service Terms;
- PAIA Manual;
- Complaints Process;
- merchant agreements; and
- any other applicable commercial agreement concluded with TPay.

1.6 If there is any inconsistency between this Privacy Policy and another TPay document, the document that specifically governs the relevant subject matter will apply to that subject matter, unless otherwise stated in writing. This Privacy Policy will apply to the processing of personal information unless another document provides a more specific privacy-related rule for a particular processing activity.

2. Definitions and Interpretation

2.1 In this Privacy Policy, unless the context indicates otherwise, the following words and expressions have the meanings set out below.

Term	Meaning
Consent	means any voluntary, specific and informed expression of will in terms of which permission is given for the processing of personal information, where consent is required.
Consumer	means a person who uses, or seeks to use, the TPay Payment Service or who interacts with TPay in relation to a payment or related service.
Data Subject	means the person to whom personal information relates.
Merchant	means a business or other person that offers goods or services and may accept payments through the TPay Payment Service.

Term	Meaning
Payment Service	means the TPay payment facilitation service that enables Consumers to initiate or authorise payment instructions through approved payment flows.
Personal Information	means personal information as defined in POPIA, including information relating to an identifiable natural or juristic person.
POPIA	means the Protection of Personal Information Act, 4 of 2013, as amended or replaced from time to time.
Processing	means any operation concerning personal information, including collection, use, storage, disclosure, transfer, deletion or destruction.
Special Personal Information	means special personal information as defined in POPIA, where applicable.
TPay	means TPPPAY Proprietary Limited, registration number 2025/544950/07, trading as TPay.
User	means any Consumer, payer, Merchant, authorised person, website visitor or other person whose personal information is processed by TPay.
Website	means the website operated by TPay and accessible at www.tppp.africa .
we, us, our	means TPay.
you, your	means the User or Data Subject, as the context requires.

2.2 References to laws include those laws as amended, replaced or re-enacted from time to time. Headings are included for convenience only and do not affect interpretation.

3. Who We Are

3.1 TPPPAY Proprietary Limited, registration number 2025/544950/07, trading as TPay, operates the TPay website and provides payment service-related functionality.

3.2 TPay is the responsible party in respect of personal information for which it determines the purpose and means of processing, unless a specific agreement, processing arrangement or legal context provides otherwise.

3.3 Where TPay processes personal information on behalf of a Merchant or other third party under a specific agreement, the applicable agreement may set out the relevant responsibilities between the parties.

4. Why We Have This Privacy Policy

4.1 This Privacy Policy is intended to help Users understand:

- what personal information TPay collects;
- why TPay collects personal information;
- how TPay uses personal information;
- when TPay shares personal information;
- how TPay stores and protects personal information;
- what rights Users have; and
- how Users can contact TPay about privacy matters.

4.2 TPay processes personal information in accordance with applicable privacy laws, including POPIA, where applicable.

5. Personal Information We Collect

5.1 TPay may collect and process the categories of personal information described below. The exact information collected will depend on the context, service, payment flow, support request, Merchant relationship, legal obligation and information voluntarily provided.

5.2 Identity and Contact Information

This may include name, surname, identity number or registration number where applicable, date of birth or age where required, physical address, registered address, email address, telephone number, company name, company registration number and VAT number where applicable.

5.3 Payment and Transaction Information

This may include bank name, bank account information where required for the payment flow, payment reference, transaction amount, Merchant name, payment status, payment confirmation details, transaction date and time, and payment-related identifiers.

5.4 Authentication and Security Information

This may include information required to authenticate or process a payment instruction, device information, IP address, browser information, security logs, authentication indicators and fraud prevention indicators.

Any password or sensitive authentication information, where processed as part of an applicable payment flow, is processed only where required for that payment flow and is subject to the Payment Service Terms, relevant security controls and applicable law.

5.5 Website and Usage Information

This may include pages viewed, links clicked, website interactions, browser settings, device type, analytics information, cookies and similar technologies.

5.6 Support and Communication Information

This may include queries submitted to TPay, complaints, correspondence, support tickets, call notes, email records and information voluntarily provided by the User.

5.7 Compliance and Risk Information

This may include information required for fraud prevention, anti-money laundering checks where applicable, regulatory compliance records, and information required by Banks, payment partners, regulators or lawful authorities.

6. How We Collect Personal Information

6.1 TPay may collect personal information from one or more of the following sources:

- directly from the User;
- through the TPay website;
- through the TPay Payment Service;
- through Merchant websites or Merchant checkout pages;
- through payment interfaces;
- through support or complaint channels;
- from Merchants;
- from Banks, payment partners, service providers or verification providers, where applicable;
- from public sources or lawful third-party sources, where applicable; and
- through cookies, analytics tools and security technologies.

6.2 TPay will only collect personal information where there is a lawful basis to do so and where the information is reasonably necessary for the relevant purpose.

7. Why We Process Personal Information

7.1 TPay may process personal information for the following purposes:

- to provide the TPay Payment Service;
- to facilitate payment instructions;
- to authenticate or support payment flows;
- to communicate with Users;
- to respond to queries and complaints;
- to support Merchants and Consumers;
- to verify Transactions;
- to prevent fraud and unauthorised activity;
- to monitor and protect the security of systems;
- to comply with legal, regulatory and contractual obligations;
- to perform internal troubleshooting, testing, reporting and analytics;
- to improve the website and Payment Service;
- to maintain business records;
- to enforce TPay's terms, policies and agreements; and
- to protect TPay's rights, Users, Merchants, systems and legal interests.

8. Legal Basis for Processing

8.1 TPay processes personal information based on one or more lawful grounds under applicable law, including:

- the User's consent, where required;
- performance of a contract or taking steps connected to a contract;
- compliance with legal obligations;
- legitimate business interests, where permitted by law;
- protection of rights, security and system integrity;
- fraud prevention and risk management; and
- where processing is necessary for the conclusion, performance or administration of a Transaction.

8.2 The applicable lawful ground may differ depending on the specific processing activity, the relationship between the parties and the legal or operational context.

9. Informed Consent

9.1 By using the Website, submitting personal information, using the Payment Service, proceeding with a payment or communicating with TPay, you acknowledge that you have read this Privacy Policy and understand how personal information may be processed.

9.2 Where consent is required by law or by the applicable payment flow, TPay will process personal information based on that consent.

9.3 Consent may be withdrawn where the law permits withdrawal. Withdrawal of consent may affect TPay's ability to provide services, process payment instructions, respond to requests or comply with applicable obligations.

10. Payment Service and Banking Information

10.1 Where you use the TPay Payment Service, TPay may process payment-related personal information required to initiate, authenticate, facilitate, confirm or support a payment instruction.

10.2 This may include bank name, payment information, transaction information, authentication-related information and related payment identifiers.

10.3 Passwords or sensitive authentication details, where processed as part of a payment flow, must be handled in accordance with applicable security safeguards, the Payment Service Terms, this Privacy Policy and applicable law.

10.4 TPay does not process banking credentials for unrelated purposes.

11. Sharing of Personal Information

11.1 TPay may share personal information where necessary or appropriate for the purposes described in this Privacy Policy, where permitted by law, where required by contract, where required for a Transaction, or where the User has consented.

11.2 Personal information may be shared with:

- Banks;
- payment partners;
- Merchants;
- service providers;
- cloud service providers;
- data analytics providers;
- customer support providers;
- identity verification providers;
- fraud prevention agencies;
- professional advisers;
- regulators;
- law enforcement authorities;
- courts or tribunals;
- companies within the TPay group, where applicable;
- any party involved in a business restructuring, merger, disposal or similar transaction; and
- other third parties where required by law, contract, consent or legitimate business purpose.

11.3 TPay will take reasonable steps to ensure that third parties who process personal information on its behalf are subject to appropriate confidentiality, security and data protection obligations.

12. Merchant Responsibility for Personal Information Provided to TPay

12.1 Where Merchants provide personal information to TPay, Merchants are responsible for ensuring that they have the necessary authority, consent or lawful basis to provide that personal information to TPay.

12.2 Merchants must comply with applicable privacy laws when collecting and sharing personal information with TPay.

12.3 TPay may rely on the Merchant's confirmation that personal information provided to TPay has been lawfully collected and shared.

13. Cross-Border Transfers

13.1 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, service provider support, payment processing, analytics, security, business operations or legal purposes.

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

13.3 Cross-border processing may be subject to the laws and standards of the relevant jurisdiction, provided that TPay will take reasonable steps to protect personal information in accordance with applicable legal requirements.

14. Storage and Retention

14.1 TPay stores personal information for as long as reasonably necessary for the purpose for which it was collected or processed.

14.2 Retention periods may be influenced by:

- legal requirements;
- regulatory obligations;
- contractual obligations;
- fraud prevention requirements;
- accounting and audit requirements;
- dispute resolution;
- security and operational requirements; and
- legitimate business purposes.

14.3 TPay will not retain personal information for longer than is necessary unless there is a lawful basis and a valid retention reason to do so.

14.4 Where personal information is no longer required, TPay may delete, de-identify, archive or restrict access to it in accordance with applicable law and internal retention requirements.

15. Security of Personal Information

15.1 TPay takes reasonable technical and organisational measures to protect personal information against unauthorised access, loss, misuse, alteration, disclosure or destruction.

15.2 These measures may include, where applicable:

- encryption;
- access controls;
- authentication controls;
- monitoring;
- secure cloud storage;
- segregation of duties;
- incident response processes;
- internal policies;
- restricted production access; and
- security reviews.

15.3 Security measures may change from time to time as systems, risks, payment methods and operational requirements develop.

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

16. Cookies and Similar Technologies

16.1 A cookie is a small text file that may be placed on a device by a website or related technology. Cookies and similar technologies can help operate a website, remember preferences, analyse usage and support security.

16.2 TPay may use cookies and similar technologies to:

- operate the Website;
- remember User preferences;
- improve Website functionality;
- analyse Website usage;

- support security;
- improve User experience; and
- monitor performance.

16.3 Users can adjust browser settings to refuse or manage cookies. Some Website features may not work properly if cookies are disabled.

17. Direct Marketing

17.1 TPay will only send direct marketing communications where permitted by law and where the required consent or lawful basis exists.

17.2 Users may opt out of direct marketing communications where applicable.

18. Rights of Data Subjects

18.1 Subject to applicable law and any legal limitations, Users may request:

- access to personal information;
- correction of personal information;
- deletion of personal information, where applicable;
- objection to processing, where applicable;
- restriction of processing, where applicable;
- confirmation of whether TPay holds personal information about them;
- details of third parties or categories of third parties who have received personal information, where applicable; and
- withdrawal of consent, where processing is based on consent.

18.2 TPay may require proof of identity before responding to a request relating to personal information.

18.3 Requests may be refused or limited where permitted or required by law, including where disclosure would affect the rights of others, legal privilege, security, fraud prevention, regulatory obligations or other lawful restrictions.

19. PAIA Manual and Access Requests

19.1 Formal access-to-records requests under the Promotion of Access to Information Act, 2 of 2000, where applicable, must be made in accordance with TPay's PAIA Manual.

19.2 The PAIA Manual is available separately and explains the process for requesting access to records, applicable forms, possible fees and grounds for refusal.

20. Privacy Queries and Complaints

20.1 Privacy-related queries or complaints may be sent to support@tppp.africa.

20.2 Users should include sufficient details for TPay to understand and respond to the query or complaint.

20.3 Where a separate Complaints Process applies, complaints may be handled in accordance with that process.

21. Complaints to the Information Regulator

21.1 You may also have the right to lodge a complaint with the Information Regulator of South Africa in accordance with POPIA, where applicable, if you believe your personal information has been processed unlawfully.

21.2 TPay encourages Users to contact TPay first so that TPay can consider and respond to the concern promptly, where appropriate.

22. Links to Other Websites

22.1 The TPay Website or payment interfaces may contain links to third-party websites, platforms or resources.

22.2 TPay is not responsible for the privacy practices, security or content of third-party websites.

22.3 Users should read the privacy policies of third-party websites before submitting personal information to them.

23. Children's Privacy

23.1 The TPay Website and Payment Service are not intended for persons under 18 years old.

23.2 TPay does not knowingly collect personal information from persons under 18 without an appropriate lawful basis or consent.

24. Changes to This Privacy Policy

24.1 TPay may update this Privacy Policy 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.

24.3 Users should review this Privacy Policy periodically to remain informed of how TPay processes personal information.

25. Contact Details

25.1 For privacy-related queries, personal information requests or questions about this Privacy Policy, 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