



PAIA MANUAL

TPay PAIA Manual

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Trading Name	TPay Africa
Shortened Brand Reference	TPay
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Scope	Access to information and related POPIA disclosures

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

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Shortened Brand Reference	TPay
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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.

LEGAL IDENTITY AND BRAND REFERENCES

Legal Entity	TPPPAY (Pty) Ltd
Registration Number	2025/544950/07
Trading Name	TPay Africa
Shortened Brand Reference	TPay
Website	www.tppp.africa

TPPPAY (Pty) Ltd, registration number 2025/544950/07, conducts business under the trading name 'TPay Africa'.

For convenience and branding purposes, TPPPAY (Pty) Ltd may use 'TPay' as a shortened brand reference to TPay Africa on the Website and in its forms, notices, communications, product materials, templates and other documents.

Where 'TPay' appears together with the existing TPay logo, the Website address www.tppp.africa, or the legal details of TPPPAY (Pty) Ltd, it must be understood as a reference to TPay Africa, with TPPPAY (Pty) Ltd remaining the relevant legal entity, unless the relevant document expressly states otherwise.

The use of 'TPay' as a shortened brand reference does not create a separate legal entity or contracting party. Any agreement concluded under the TPay brand is concluded with TPPPAY (Pty) Ltd, trading as TPay Africa, unless expressly stated otherwise.

Nothing in this document asserts ownership of, affiliation with, endorsement by, or responsibility for any unrelated person or business using 'TPay', 'T Pay' or a similar name in South Africa or elsewhere.

Contracting party: TPPPAY (Pty) Ltd, Registration No. 2025/544950/07, trading as TPay Africa and using 'TPay' as a shortened brand reference.

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PAIA MANUAL

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PAIA Notice: This PAIA Manual has been prepared for TPPPAY (Pty) Ltd, trading as TPay Africa, 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 (Pty) Ltd, registration number 2025/544950/07, trading as TPay Africa

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

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

Terms of Website Use, Payment Service Terms, Privacy Policy, PAIA Manual and Complaints Process

Website policies

Yes, where published Yes

Trading name, registration number, address, website and contact email

Public company information

Yes, where published Yes

General information about TPay services and website content

General service information

Yes, where published Yes

Published legal, service, compliance or operational notices

Public 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 onboarding information; merchant contact records; merchant agreements; support correspondence; merchant configuration records, where applicable.

Merchant records

Consumer and payer records Consumer contact information; payer support records; payment- related identifiers; query and complaint records.

Payment instruction records; transaction reference records; merchant payment information; payment status records; payment-related support records.

Payment service records

Transaction date and time; amount; merchant information; bank or payment method details; status and reference records, where applicable.

Transaction and payment instruction records

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

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.

Consumers and payers

Name; contact details; company details; registration information; banking or settlement-related information, where applicable; authorised representative details; contractual and support records.

Merchants and merchant representatives

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.

Identity and contact details; employment or appointment records; qualifications; role information; remuneration or payment information, where applicable; compliance and security access records.

Employees, officers or contractors, where applicable

Names; contact details; correspondence; role or organisation details; records relating to regulatory, legal or business communications.

Regulators, advisers and business contacts

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.

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.

Business and contractual information

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.

15. Approval and Issue

15.1 This PAIA Manual is issued for and on behalf of TPPPAY (Pty) Ltd, trading as TPay Africa.