



ACCESS TO INFORMATION (PAIA) MANUAL

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

SHOP2SHOP (PTY) LTD AND ITS SUBSIDIARIES

COMPANY NAME:	Shop2Shop (Pty) Ltd
REGISTRATION NUMBER:	2005/034270/07
TYPE OF COMPANY:	FinTech
ADDRESS:	17 New Church Street, Cape Town, 8000
POSTAL ADDRESS:	Suite 203, Private Bag x18, Newlands, Western Cape, 7701, South Africa
CALL CENTRE NUMBER:	021 023 0291

OWNERSHIP

This manual is owned by Shop2Shop (Pty) Ltd and its subsidiaries, hereunder referred to as the “Company”).

The CEO of the Company hereby confirms the adoption of this manual that will be effective on 1 July 2022.

DISCLAIMER

The contents of this document should only be used for and by the Company and may not be distributed unlawfully. Older versions are not deemed official. Only the latest version is acceptable.

INTRODUCTION

The Promotion of Access to Information Act, 2000 (“**PAIA**”), PAIA gives effect to section 32 of the Constitution, which provides that everyone has the right to access information held by the State, as well as information held by another person (or private body) when such privately held information is required to exercise a right or to protect a right.

PAIA states that a person requesting information must be given access to any record of a private body, if that record is required for the exercise or the protection of a right. However, such request must comply with the procedural requirements laid down by the Act. This manual is compiled in accordance with Section 51 of PAIA and to address requirements of the Protection of Personal Information Act 2013 and its Regulations, specifically Regulation 4 (“**POPIA**”).

This manual provides you with information about the type of information held as well as the process you should follow to access information held by the Company for which it has management responsibility. Where this manual refers to the Company, it includes the subsidiaries listed in Annexure A attached.

The purpose of this manual is:

- i. to support transparency in data processing and to promote the right to access information by assisting potential requestors with the procedure that must be followed when requesting access to information / documents from the Company as contemplated in PAIA;
- ii. to detail the purpose for which Personal Information, as defined in POPIA, may be processed; a description of the categories of Data Subjects for whom the Company processes Personal Information as well as the categories of Personal Information relating to such data subjects; the recipients to whom Personal Information may be supplied and cross border data transfer under POPIA.

COMPANY CONTACT DETAILS

Phone Number: +2721 422 2018

E-mail address: informationofficer@shop2shop.co.za

Postal Address: Suite 203, Private Bag x18, Newlands, Western Cape, 7701,
South Africa

Physical Address: 17 New Church Street Cape Town 8000

SECTION 10 GUIDE ON HOW TO USE PAIA

Any requestor is advised to contact the Company's Information Officer at informationofficer@shop2shop.co.za for assistance in regard to this manual.

Contact person: Information Officer

Physical address: 17 New Church Street
Cape Town
8000

Postal Address: Suite 203, Private Bag x18
Newlands
Western Cape
7701
South Africa

Website: <https://www.shop2shop.co.za/>

Email: informationofficer@shop2shop.co.za

Telephone number: 021 422 2018

Should you require information on how to access the Company's information, you can contact the Information Regulator, who is responsible for the administration of PAIA:

Contact person: Information Regulator

Postal address: Private Bag 31533
Braamfontein
2017

Physical Address: JD House 27 Stiemens Street

Braamfontein

Johannesburg

Website: www.justice.gov.za

Email: enquiries@inforegulator.org.za

RECORDS HELD BY THE COMPANY

The Company holds records in terms of other legislation, insofar as it is applicable to the Company's operations, as listed in Annexure C.

Please note that while the Company has endeavored to provide a complete list of applicable legislation, it is possible that the list could be incomplete. Should we become aware of any other applicable legislation which allows you to request access on another basis, other than PAIA, we will update the list accordingly.

If you believe that a right of access to a record exists in terms of other legislation listed above or any other legislation, you are required to indicate what legislative right the request is based on, to allow the Information Officer the opportunity of considering the request in light thereof. Furthermore, the accessibility of the documents and records may be subject to the grounds of refusal set out in this manual.

Should applicable legislation require the Company to make specific records available to you for inspection, the Company will make the said records available, provided that no other legislation forbids the Company from doing so, the access is requested by an interested party, who is entitled to such information and it is done in accordance with the provisions of PAIA, the relevant legislation and any applicable internal policies of the Company.

The Company keeps records of various categories of information, as set out in Annexure A.

A description of records which are freely available without having to submit a formal request to access information in terms of the Act is listed in Annexure B.

The information held by the Company set out in Annexure A and C is not readily available and may be subject to the grounds of refusal set out in this manual. Every request for access to these documents will be reviewed on a case-by-case basis and the Company reserves the right to decline access to records in accordance with the provisions of PAIA. Any request for information needs to be motivated in terms of sections 63 to 67 of PAIA.

PROCEDURE FOR OBTAINING ACCESS TO INFORMATION

Any person who wishes to request any information held by the Company in order to protect or exercise a right may contact the Company's Information officer at the following contact details:

Physical address: 17 New Church Street, Cape Town, 8000

Phone Number: +27 21 422 2018

E-mail address: informationofficer@shop2shop.co.za

You must use the prescribed form to make the request for access to a record. The request form is available [here](#) or from our offices.

All required text fields on the annexed "Request for Information Form" must be completed in full and in a legible form. The form (as well as any additional pages attached thereto) must be signed by the person submitting the form.

Once the "Request for Information Form" has been submitted, the Information Officer will notify the person who submitted the request of the prescribed fee (if any) payable before further processing the request.

A standard request fee as set out in Annexure D will be charged for access to any records. If the request is granted, the person who submitted the request will be accordingly notified and a further access fee will be payable. The additional fee would be for the reproduction, preparation and time reasonably required to search for and prepare the disclosure. The person who submitted the request may lodge an application to court against the tender or payment of the fee.

An individual seeking access to a record containing their own personal information will not be charged a request fee. A person submitting the request must:

- Indicate the identity of the person seeking access to the information
- Provide sufficient particulars to enable the information officer to identify the information requested
- Specify the format in which the information is required
- Indicate the contact details of the person requiring the information
- Indicate the right to be exercised and/or to be protected, and specify the reasons why the information required will enable the person to protect and/or exercise the right
- Where the person requesting the information wishes to be informed of the decision of the request in a particular manner, state the manner and particulars to be so informed

If the request for information is made on behalf of another person, submit proof that the person submitting the request, has obtained the necessary authorisation to do so.

The access fee that you must pay is as indicated in Annexure D. In the event that the information pertains to the person requesting access, no request fee is payable.

GROUNDINGS FOR REFUSAL OF ACCESS TO RECORDS

Chapter 4 of PAIA provides a number of grounds on which a request for access to information must be refused, summary of which is set out below:

Section 63 of PAIA sets out the mandatory protection of privacy of third parties who are natural persons.

Section 64 of PAIA provides for mandatory protection of commercial information of third party, including records which contain trade secrets; financial, commercial, scientific or technical information, other than trade secrets, of a third party, the disclosure of which would be likely to cause harm to the commercial; or financial interests of that third party; or information supplied in confidence by a third party.

Section 65 of PAIA sets out the mandatory protection of certain confidential information of third party, where the disclosure would constitute a breach of confidentiality.

Section 66 of PAIA makes provision for mandatory protection of safety of individuals, and protection of property.

Section 67 of PAIA provides for the mandatory protection of records privileged from production in a legal proceeding.

Section 68 of PAIA provides for refusal of commercial information of the Company if it contains trade secrets, contains financial, commercial, scientific or technical information, other than trade secrets, of the private body, the disclosure of which would be likely to cause harm to the commercial or financial interests of

the Company; information which, if disclosed, could put the Company at a disadvantage in negotiations or commercial competition; or a software program which is owned by the Company and which is protected by copyright.

Section 69 of PAIA sets out the mandatory protection of research information of the Company or a third party, if its disclosure would place the Company, the third party or the subject matter of the research at a serious disadvantage.

All requests for information will be evaluated on their merits and in accordance with applicable legal principles and laws. Requests for information that are clearly frivolous, intrusive, or involve an unreasonable waste of resources may also be denied.

RECORDS NOT FOUND OR NON-EXISTENT

If the Company has searched for a record and believe that it either does not exist or cannot be found, the Company will notify the requester by way of an affidavit or affirmation that it is not possible to provide access to the requested record due to its inability to locate it. The Company will also provide the requester with details on the steps that were taken to try to locate the record and will confirm to the requester that, if at a later stage the record is located, the Company will grant the requester access, provided that access is not prohibited in terms of Chapter 4 of Part 3 of the Act.

PROCESSING OF PERSONAL INFORMATION

Chapter 3 of the Protection of Personal Information Act, 2013 and its Regulations (“**POPIA**”) sets out the minimum conditions for lawful processing of Personal Information by a Responsible Party, as defined in POPIA, and the Company will therefore ensure that when it processes Personal Information, as defined in POPIA, of a data subject, that:

- (i) Personal Information is processed lawfully and in a reasonable manner that does not infringe the privacy of the data subject
- (ii) Personal information may only be processed if, given the purpose for which it is processed, it is adequate, relevant and not excessive
- (iii) Personal information may only be processed if—
 - a. the data subject or a competent person, where the data subject is a child, consents to the processing;
 - b. processing is necessary to carry out actions for the conclusion or performance of a contract to which the data subject is party;
 - c. processing complies with an obligation imposed by law on the Responsible Party;
 - d. processing protects a legitimate interest of the data subject;
 - e. processing is necessary for the proper performance of a public law duty by a public body; or
 - f. processing is necessary for pursuing the legitimate interests of the Responsible Party or of a third party to whom the information is supplied
 - g. is accurate and kept up to date
 - h. Personal Information is collected for a specific, explicitly defined and lawful purpose related to a function or activity of the Responsible Party;
 - i. records of Personal Information must not be retained any longer than is necessary for

achieving the purpose for which the information was collected or subsequently processed unless—

- i. retention of the record is required or authorised by law;
 - ii. the responsible party reasonably requires the record for lawful purposes related to its functions or activities;
 - iii. retention of the record is required by a contract between the parties thereto; or
 - iv. the data subject or a competent person where the data subject is a child has consented to the retention of the record.
- (iv) The Company destroys or deletes a record of Personal Information or de-identify it as soon as reasonably practicable after the Company is no longer authorised to retain the record;
- (v) The Company ensures that the integrity and confidentiality of Personal Information in its possession or under its control is secured, by taking appropriate, reasonable technical and organisational measures to prevent:
- a. loss of, damage to or unauthorised destruction of Personal Information; and
 - b. unlawful access to or processing of Personal Information;
- (vi) Personal Information is processed in accordance with the rights of Data Subjects, where applicable. Data Subjects have the right to:
- a. be notified that their Personal Information is being collected by the Company;
 - b. request confirmation whether the Company holds Personal Information about them, and to access a description of the information or a record thereof. Any request for information must be handled in accordance with the provisions of this Manual;
 - c. request the correction or deletion of inaccurate, irrelevant, excessive, out of date, incomplete, misleading or unlawfully obtained Personal Information.
 - d. object to the Company's use of their Personal Information and request the deletion of such Personal Information (deletion would be subject to the Company's recordkeeping requirements and duties in terms of the other applicable laws);
 - e. object to the processing of Personal Information for purposes of direct marketing by means of unsolicited electronic communications;
 - f. to be informed about a breach or unauthorised data access;
 - g. log a complaint to the Information Regulator regarding an alleged infringement of any of the rights protected under POPIA and institute civil proceedings regarding the alleged non-compliance with the protection of his/her or its Personal Information.

Purpose of Processing Personal Information

The purposes for which the Company processes or will process Personal Information is set out in our privacy notice.

Categories of data subjects and Personal Information/Special Personal Information

Our privacy notice sets out the categories of data subjects and the Personal Information which the Company processes.

The recipients or categories of recipients to whom the Personal Information may be supplied

Our privacy notice sets out the recipients and categories recipients which the Company shares the Personal Information with.

Cross-border transfer of Personal Information

The Company accesses and uses the Personal Information in South Africa. The Company may process Personal Information outside South Africa (for example data hosting in the cloud), but only in countries with adequate data protection laws or where the Company has an agreement with the recipient that contains appropriate data protection measures.

Description of information security measures implemented

The Company implemented technological and organisational measures aimed at protecting the confidentiality and integrity of Personal Information. The Company has identified the reasonably foreseeable internal and external risks to Personal Information and has established, and will maintain, appropriate safeguards against these risks. The Company regularly verifies that these safeguards are being effectively implemented and will continually update these safeguards in response to new risks or deficiencies identified.

MANUAL AVAILABILITY

The manual is available for inspection at the Company's office free of charge.

ANNEXURE A: RECORD TYPES

Request for access to documents held by the Company will be in accordance with the Act. The type of records available for consideration to the person requesting the information are listed hereunder, and includes but are not limited to:

<u>Subject</u>	<u>Category</u>
<u>Administrative Records</u>	<p>The Company's license, permits, certifications</p> <p>The Company's compliance manual</p> <p>The Company's policies</p> <p>The Company's internal rules and procedures</p> <p>Any personal records provided to the Company by its employees</p> <p>Any records which a third party has provided to the Company about any of its employees</p>
<u>Human Resources Records</u>	<p>Any personal records provided to the Company by its employee</p> <p>Any records which a third party has provided to the Company about any of its employee</p> <p>Conditions of employment and other employee-related contractual and quasi-legal records</p> <p>Internal evaluation and training records</p> <p>Other internal records and correspondence</p> <p>Criminal Checks and Credit Checks</p> <p>Psychometric assessments</p> <p>CV's</p> <p>Academic Qualifications</p> <p>Career development plans</p> <p>Leave records and absence management records</p> <p>UIF Returns</p> <p>PAYE records and returns</p> <p>Employment Equity Reports</p> <p>Policies and procedures and codes</p> <p>SETA records</p> <p>Letters and communications</p> <p>Training manuals and records</p>

	<p>Documents issued to employees for income tax purposes;</p> <p>Records of payments made to SARS on behalf of employees;</p>
<u>Client-related Records</u>	<p>Advice records</p> <p>Operational records</p> <p>Databases</p> <p>Information technology</p> <p>Marketing records</p> <p>Internal correspondence</p> <p>Product records</p> <p>Statutory records</p> <p>Internal policies and procedures</p> <p>Treasury-related records</p> <p>Records held by officials of the Company</p> <p>Customer details</p> <p>Client contracts</p> <p>Service application information including client know your customer documents and records provided by third parties and the customers</p> <p>Client agreements</p> <p>Onboarding documentation;</p> <p>Client business information;</p> <p>Legal documentation;</p> <p>Business requirements and project plans;</p> <p>Risk management records;</p> <p>Standard terms and conditions of supply of goods and/or services Statement of works Service level tracking correspondence</p>
<u>Financial Records</u>	<p>Financial statements</p> <p>Audit records</p> <p>Asset's inventory</p> <p>Reconciliation statements</p> <p>Payroll documentation</p> <p>Annual Financial Statements Asset Registers</p> <p>Bank Statements and records - Banking details and bank accounts Banking Records</p>

	<p>Debtors / Creditors statements and invoices</p> <p>General ledgers and subsidiary ledgers</p> <p>General reconciliation</p> <p>Paid Cheques</p> <p>Policies and procedures</p> <p>Rental Agreements</p> <p>Tax Records and Returns Agreements</p> <p>Correspondence</p> <p>Purchase orders</p> <p>Remittances Invoices and statements</p> <p>All other statutory compliances:</p> <p style="padding-left: 40px;">VAT</p> <p style="padding-left: 40px;">Regional Services Levies Skills Development Levies</p> <p style="padding-left: 40px;">UIF</p> <p style="padding-left: 40px;">Workmen's Compensation</p>
<p><u>Other Parties</u></p>	<p>The Company may possess records pertaining to other parties, including without limitation, contractors, suppliers, subsidiary/holding companies, joint venture companies and other financial services providers.</p> <p>These records include:</p> <ul style="list-style-type: none"> • Service level agreements • Financial records • Correspondence • Non-Disclosure Agreements <p>Alternatively, such other parties may possess records which can be said to belong to the Company. The following records fall under this category:</p> <ul style="list-style-type: none"> • Employee, Client or Company records which are held by another party • Records held by Company pertaining to other parties, including without limitation: <ul style="list-style-type: none"> ○ Financial records ○ Correspondence ○ Contractual records ○ Records provided by the other party

ANNEXURE B: AUTOMATICALLY AVAILABLE RECORDS

The following records are automatically available on our website without having to submit a formal request to access the information in terms of the Act.

- brochures
 - various other marketing and promotional material including videos.
-

ANNEXURE C: APPLICABLE LEGISLATION

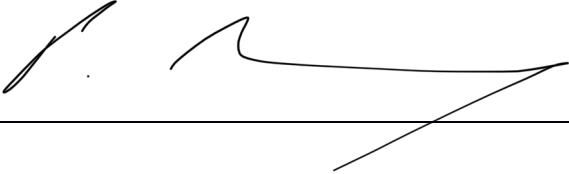
- Arbitration Act
- Auditing Professions Act
- Basic Conditions of Employment Act 75 of 1997
- Broad-Based Black Economic Empowerment Act 53 of 2003Companies Act 71 of 2008
- Card association rules
- Compensation for Occupational Injuries and Diseases Act 130 of 1993
- Competition Act 89 of 1998
- Consumer Protection Act 68 of 2008
- Copyright Act 98 of 1978
- Criminal Procedure Act 51 of 1977
- Debt Collectors Act 114 of 1998
- Domicile Act 3 of 1992
- Employment Equity Act 55 of 1998
- Electronic Communications and Transactions Act 25 of 2002
- Electronic Communications Act, 36 of 2005
- Financial Advisory and Intermediary Services Act 37 of 2002
- Financial Intelligence Centre Act 38 of 2001
- Financial Institutions (Protection of Funds) Act
- Financial Markets Act 19 of 2012
- Friendly Societies Act
- Income Tax Act 58 of 1962
- Insolvency Act
- Intellectual Property Laws Amendments Act 38 of 1997
- Labour Relations Act 66 of 1995
- National Credit Act 34 of 2005
- National Payment System Act 78 of 1998
- Non-profit Organisations Act 71 of 1997
- Occupational Health and Safety Act 85 of 1993
- Pension Fund Act 24 of 1956
- Prevention of Organised Crime Act 121 of 1998

- Prevention and Combating of Corrupt Activities Act 12 of 2004
- Protection of Personal Information Act 4 of 2013
- Promotion of Access to Information Act 2 of 2000
- Promotion of Equality and Prevention of Unfair Discrimination Act 4 of 2000
- Protection of Constitutional Democracy against Terrorist and related Activities Act
- Protected Disclosures Act 26 of 2000
- South African Reserve Bank Act 90 of 1989
- Sectoral Determinations (Industry specific)
- Skill Development Levies Act 9 of 1999
- Skills Development Act 97 of 1998
- South African Qualifications Authority Act
- Tax Administration Act 28 of 2011
- Tax Administration Laws Amendment Act 44 of 2014
- Trademarks Act 194 of 1993
- Unemployment Insurance Act 63 of 2001
- Unemployment Insurance Contributions Act 4 of 2002
- Value Added Tax Act 89 of 1991
- Such other legislation as may from time to time be applicable

ANNEXURE D: FEES

The following fees are payable in terms of Section 54	
Description of record	Fee
The request fee payable by every person requesting access	R 50.00
For every black & white photocopy of an A4-size page or part thereof	R 2.00
For a copy in a computer-readable form on:	
(i) Flash drive	(i) R 40.00
(ii) compact disk	(ii) R 60.00
For a transcription of visual images, for an A4-size page or part thereof	Depends on service provider
For a copy of visual images	
For a transcription of an audio record, for an A4-size page or part thereof	R 24.00
For a copy of an audio record on:	
(i) Flash drive	(i) R 40.00
(ii) Compact disc	(ii) R 60.00
(i) To search for and prepare the record for disclosure for each hour or part of an hour, excluding the first hour, reasonably required for such search and preparation.	(i) R145.00
(ii) The charge of the search and preparation referred to above cannot exceed the total cost of:	(ii) R 435.00
(iii) If search exceeds 6 hours, a deposit if payable of:	(iii) One third of the amount per request calculated in terms of the cost of preparation of the requested records
Postage, email or any other electronic transfer e.g., MFT	Actual expense incurred by Company, if any.

This PAIA Manual is hereby signed off by the Company's CEO

CEO Signature	
Date	5 July 2023