

PAIA MANUAL

**Prepared in terms of section 51 of
the Promotion of Access to Information Act 2 of 2000
(The 'Act') as Amended**

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1. LIST OF ACRONYMS AND ABBREVIATIONS

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|------------------|-------------------------------------------------------------------|
| 1.1. 'CEO' | Chief Executive Officer |
| 1.2. 'DIO' | Deputy Information Officer. |
| 1.3. 'IO' | Information Officer. |
| 1.4. 'Minister' | Minister of Justice and Correctional Services. |
| 1.5. 'PAIA' | Promotion of Access to Information Act No. 2 of 2000 (as Amended. |
| 1.6. 'POPIA' | Protection of Personal Information Act No.4 of 2013. |
| 1.7. 'Regulator' | Information Regulator. |
| 1.8. 'Republic' | Republic of South Africa. |

2. KEY CONTACT DETAILS

Company Name	Tayo Pay Pty Ltd
Registration Number	2017/665179/07
Address	304 Durban Road, Bellville, Cape Town, 7530, Western Cape
Telephone	+27 21 023 3333
Website	www.tayopay.co.za
CEO	Mohamed Ali
Compliance Officer	Sibonginkosi Nyati
Email Address	compliance@tayopay.co.za

3. GUIDE ON HOW TO USE PAIA AND HOW TO OBTAIN ACCESS TO THE GUIDE

- 3.1. The Regulator has, in terms of section 10(1) of PAIA, as amended, updated and made available the revised Guide on how to use PAIA ('Guide'), in an easily comprehensible form and manner, as may reasonably be required by a person who wishes to exercise any right contemplated in PAIA and POPIA.
- 3.2. The Guide is available in each of the official languages and in braille.
- 3.3. The aforesaid Guide contains the description of:
 - 3.3.1.the objects of PAIA and POPIA;
 - 3.3.2.the postal and street address, phone and fax number and, if available, electronic mail address of the Information Officer of every public body, and
 - 3.3.3.every Deputy Information Officer of every public and private body designated in terms of section 17(1) of PAIA¹ and section 56 of POPIA²;
- 3.4. the manner and form of a request for:
 - 3.4.1.access to a record of a public body contemplated in section 113; and
 - 3.4.2.access to a record of a private body contemplated in section 504;
 - 3.4.3.the assistance available from the IO of a public body in terms of PAIA and POPIA;
 - 3.4.4.the assistance available from the Regulator in terms of PAIA and POPIA;
- 3.5. all remedies in law available regarding an act or failure to act in respect of a right or duty conferred or imposed by PAIA and POPIA, including the manner of lodging:
 - 3.5.1.an internal appeal;
 - 3.5.2.a complaint to the Regulator; and
 - 3.5.3.an application with a court against a decision by the information officer of a public body, a decision on internal appeal or a decision by the Regulator or a decision of the head of a private body;

- 3.5.4. the provisions of sections 145 and 516 requiring a public body and private body, respectively, to compile a manual, and how to obtain access to a manual;
 - 3.5.5. the provisions of sections 157 and 528 providing for the voluntary disclosure of categories of records by a public body and private body, respectively;
 - 3.5.6. the notices issued in terms of sections 229 and 5410 regarding fees to be paid in relation to requests for access; and
 - 3.5.7. the regulations made in terms of section 9211.
- 3.6. Members of the public can inspect or make copies of the Guide from the offices of the public and private bodies, including the office of the Regulator, during normal working hours.
- 3.7. The Guide can be obtained from the website of the Information Regulator
<https://inforegulator.org.za/paia-forms/#>

4. THE ACT

- 4.1. The ACT grants a requester access to records of a private body, if the record is required for the exercise or protection of any rights. If a public body lodges a request, the public body must be acting in the public interest.
- 4.2. Requests in terms of the ACT shall be made in accordance with the prescribed procedures, at the rates provided, available on: <https://inforegulator.org.za/wp-content/uploads/2020/07/Form-3-PAIA.pdf>
- 4.3. Requesters are referred to the Guide which has been compiled by the South African Human Rights Commission, which will contain information for the purposes of exercising Constitutional Rights. The Guide is available from the SAHRC.

5. APPLICABLE LEGISLATION

No:	Reference:	Act:
1	No 71 of 2008	Memorandum of Incorporation
2	No 98 of 1978	Copyright Act
3	No 55 of 1998	Employment Equity Act
4	No 58 of 1962	Income Tax Act
5	No 66 of 1995	Labour Relations Act
6	No 89 of 1991	Value Added Tax Act
7	No 75 of 1997	Basic Conditions of Employment Act
8	No 25 of 2002	Electronic Communications and Transactions Act
9	No 2 of 2000	PAIA Manual
10	No 63 of 2001	Unemployment Insurance Act
11	No 85 of 1993	Occupational Health and Safety Act
12	No 53 of 2003	Broad-Based Black Economic Empowerment Act
13	No 9 of 1999	Skills Development Levies Act
14	No 4 of 2013	POPI Act

6. CATEGORIES OF RECORDS OF TAYO PAY PTY LTD WHICH ARE AVAILABLE WITHOUT A PERSON HAVING TO REQUEST ACCESS

These records are available on the website: www.tayopay.co.za

Category of Records	Available on Website	Available on request
Information pertaining to the Company's products and services published on the Company website and generally available within the public domain	X	
PAIA Manual	X	
POPIA Manual	X	
Privacy Notice	X	
Terms and Conditions/Terms of use	X	
Promotional and marketing material published on the Company website and generally available within the public domain	X	
Company policies and procedures		X
Public financial statements		X

7. SUBJECTS ON WHICH THE BODY HOLDS RECORDS AND CATEGORIES OF RECORDS HELD ON EACH SUBJECT BY TAYO PAY PTY LTD

The subjects that the Company holds records of, and the type of records that the Company holds in respect of these subjects may include, but is not limited to:

Subjects	Categories of records
Clients	<ul style="list-style-type: none"> - Client KYC details - Client Correspondence - Client Contracts - Control Reports - Client Statutory and Tax records - Client Business Information - Investigative Material - Legal Documentation - Licenses
Entity	<p>HR policies and procedures</p> <ul style="list-style-type: none"> - Advertised posts - Employees records <p>Corporate Governance</p> <p>Meeting Minutes</p> <ul style="list-style-type: none"> - Executive Committee Meeting Minutes - Enterprise-Wide Risk Management Records <p>Legal</p> <ul style="list-style-type: none"> - All Agreements across all departments - Litigation and other claims - Patents and Trademark Documents

- Insurance documents
- Finance and Administration**
- Accounting Records
- Annual Financial Statements (which includes audit reports)
- Correspondence (proof of payments)
- Invoices and statements
- Management Reports
- Tax Records and Returns (including VAT returns)
- SARS Returns Statistics SA Returns
- Stats SA returns
- Human Resources**
- Accounting and Payroll Records
- BEE Statistics
- Career Development Records
- Personnel Information
- Employment Equity Reports
- General Terms of Employment
- Letter of Employment
- Leave Records
- PAYE Records and Returns
- Performance Management Records
- Policies and Procedures
- Return to UIF
- Retirement Benefit and Medical Aid Record
- Information Management and Technology**
- Equipment Register
- Information Policies, Standards, Procedures and Guidelines
- Software register
- Learning and Education**
- Training Material
- Training Records and Statistics
- Training Agreements
- Marketing and Communication**
- Proposal Documents
- Brand Information Management
- Marketing Strategies
- Communication Strategies
- Marketing Brochures
- Operations**
- Access Control Records
- Archival Administration Documentation
- Communication Strategies
- General Correspondence
- Office Telephone Management Information
- Travel Documentation
- Secretarial Services**

	<ul style="list-style-type: none"> - Applicable statutory documents such as but not limited to certificates of incorporation and certificates to commence business - Annual Reports - Corporate Structure Diagrams - Memoranda and Articles of Association - Share Registers - Statutory Returns to Relevant Authorities - Share Certificates - Shareholder Agreements - Meeting Minutes <p>Third Parties</p> <ul style="list-style-type: none"> - Service Level Agreements - Rental Agreements - Correspondence - Company Documents - Licenses
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8. FORM OF REQUEST & FEES

To facilitate the processing of your request, kindly:

- 8.1. Use the prescribed form, available here: <https://infoeregulator.org.za/>.
- 8.2. Address your request to the Head of the Company (CEO).
- 8.3. Provide sufficient details to enable the COMPANY to identify:
 - 8.3.1. The record(s) requested.
 - 8.3.2. The requester (and if an agent is lodging the request, proof of capacity).
 - 8.3.3. The form of access required.
 - 8.3.4. The postal address or contact telephone number of the requester in the Republic.
 - 8.3.5. If the requester wishes to be informed of the decision in any manner (in addition to written) the manner and particulars thereof.
 - 8.3.6. The right which the requester is seeking to exercise or protect with an explanation of the reason the record is required to exercise or protect the right.
- 8.4. See Annexure A for the request form and fees.

9. PROCESSING OF PERSONAL INFORMATION

9.1. Purpose of Processing Personal Information (POPIA)

Tayo Pay processes the personal information of its clients only for the purposes for which said information was collected and as agreed, for example:

- 9.1.1. To provide our products or services to our clients.
- 9.1.2. To execute transactions for and on behalf of our clients.
- 9.1.3. To maintain and nurture our client relationships.
- 9.1.4. To conduct verification processes with third parties.
- 9.1.5. To confirm and verify our client's identity or to verify that our clients are authorized users for security purposes, as the case may be.
- 9.1.6. For the detection and prevention of fraud, crime, money laundering or other malpractice.
- 9.1.7. To conduct market or customer satisfaction research and for statistical analysis.

9.1.8. For audit and record-keeping purposes.

9.1.9. To liaise with third parties to offer services to our clients that form part of the products our clients have with us.

9.1.10. In connection with legal proceedings.

9.2. Description of the categories of Data Subjects and of the information or categories of information relating thereto.

The categories of data subjects on which the Company holds records, and the type of records held on each data subject by the Company may include, but is not limited to:

Category of Data Subjects	Personal Information that may be Processed
Customers/Clients	Name, address, identity numbers, employment status, bank details
Service Providers	Names, registration number, VAT & TAX numbers, company address, bank details, corporate policies & profiles.
Job Applicants	Name, address, identity numbers, contact number, email address, bank details, criminal record
Employees	Name, address, identity numbers, contact number, email address, bank details, criminal record

9.3. Planned transborder flows of personal information

The transfer of personal information from the Republic to foreign countries is prohibited unless:

9.3.1. The person receiving the information is subject to a law, binding corporate rules and/or binding agreement that provides an adequate level of protection that effectively upholds principles for reasonable processing of the information that are substantially similar to the conditions for the lawful processing of personal information relating to a Data Subject who is a natural person and, where applicable, a juristic person and includes provisions, that are substantially similar to the provisions of POPIA, relating to the further transfer of personal information from the recipient to third parties who are in a foreign country.

9.3.2. The Data Subject has agreed to the transfer of information.

9.3.3. Such a transfer is necessary for the performance of a contract between the Data Subject and the responsible party, or for the implementation of pre-contractual measures taken in response to the Data Subject's request.

9.3.4. Such a transfer is necessary for the conclusion or performance of a contract concluded in the interest of the Data Subject between the responsible party and a third party.

9.3.5. Transfer is for the benefit of the Data Subject, and it is not reasonably practicable to obtain their consent and that such consent, if it were reasonably practicable to obtain same, would be likely to have been given.

9.4. General description of Information Security Measures to be implemented by the responsible party to ensure the confidentiality, integrity and availability of the information.

Tayo Pay has implemented various IT Security initiatives such as, but not limited to:

9.4.1. Firewall and network endpoint protection.

9.4.2. Antivirus and Multifactor Authentication.

9.4.3. Encryption of data at rest (inclusive of backups).

9.4.4. Access levels defined and super user access limited (Data security matrices).

9.4.5. Disaster Recovery and Business Continuity Management.

9.4.6.Driven by policy (Information Security Policy).

Data quality and integrity is governed through data governance standards and represented in the Data Quality standards document where controls are defined and monitored. Stewardship processes are implemented to ensure data integrity for personal information.

10. AVAILABILITY OF THE MANUAL

A copy of the Manual is available:

- 10.1.1. On www.tayopay.co.za, if any.
- 10.1.2. Head office of Tayo Pay Pty Ltd for public inspection during normal business hours.
 - 10.1.2.1. To any person upon request and upon the payment of a reasonable prescribed fee.
 - 10.1.2.2. To the Information Regulator upon request.
- 10.1.3. A fee for a copy of the Manual, as contemplated in annexure B of the Regulations, shall be payable per each A4-size photocopy made.

11. CHANGES TO THIS MANUAL

The most current version of this PAIA Manual governs our practices concerning personal data collection, processing, and disclosure. Any revisions to the guide will be duly noted on this page.

We reserve the right to amend this guide at any time without notice. By continuing to use this website, you agree to be bound by the current version of this guide.