



**Manual in terms of Section 51  
of the Promotion of Access to Information Act No.2 of 2000 ("PAIA")**

for

**PAY AT HOLDINGS (PTY) LTD**

(Registration Number 2018/276719/07)

Last updated: **11 December 2025**

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## 1. Introduction

Pay At Holdings (Pty) Ltd is a South African company and it acts as the holding company for the Pay@ group of companies. Its primary function is to hold shares in its subsidiaries and oversee group governance and strategy.

This manual is compiled to comply with the requirements of PAIA. In it you (also known as the “requester”) will find information to assist you to exercise your rights under PAIA that entitle you to access certain records that are in our possession.

## 2. SAHRC Guide

- 2.1. PAIA grants a requester access to records of a private body if the record is required for the exercise or protection of any rights. If the requester is a public body, it will have to demonstrate that the request is in the public interest.
- 2.2. The South African Human Rights Commission (“SAHRC”) is responsible for publishing a guide (“Guide”) in each of South Africa’s official languages to assist persons to exercise their rights under PAIA.
- 2.3. Requesters are referred to the Guide which contains information to assist requesters to exercise their rights under PAIA. The contact details of the SAHRC are:

<b>Postal Address</b>	Private Bag 2700, Houghton, 2041
<b>Telephone Number</b>	+27-11-877 3600
<b>Facsimile</b>	+27-11-403 0625
<b>Website</b>	<a href="http://www.sahrc.org.za">www.sahrc.org.za</a>

## 3. Our Details

<b>Company Name</b>	Pay At Holdings (Pty) Ltd
<b>Registration Number</b>	2018/276719/07
<b>Directors</b>	Andrew Graeme Hardie
	Hendrik Johannes Carse
	Neil Walter Holzapfel
	Pieter Jacobus Venter

	Trent Jordan Hudson
	Barry Patrick Lynch
	Jeremias Jacobus van der Westhuyzen
	Mark Steven Sunderhuse
	Marlinda Magdalena de Klerk
	Du Preez Venter
<b>Physical Address</b>	Suite 4, Old College Building, 35 Church Street, Stellenbosch, 7600
<b>Postal Address</b>	PO Box 63, Stellenbosch, 7599
<b>Telephone</b>	+27 (0)21 886 5557
<b>Email for Enquiries</b>	info@payat.co.za
<b>Contact Email for CEO</b>	andrew@payat.co.za

#### 4. Schedule of Records

We hold the following records.

<b>Department</b>	<b>Record Type</b>	<b>Format Type</b>
Statutory & Corporate	Company registration documents, MOI, CIPC certificates, director registers, share registers, group structure documentation	Hard copy or electronic format
Financial and Payroll	Annual financial statements, tax records (income tax, VAT, PAYE, SDL, UIF), audit reports, auditor correspondence, invoices, bank statements, employee contracts and information	Hard copy or electronic format
Governance & Compliance	Board and committee meeting minutes, risk management frameworks, Internal Policies and Procedures, insurance policies, Information Officer appointment and registration certificates, Director Declaration of Interest, Directors and Shareholders KYC Documents	Hard copy or electronic format

POPIA & Personal Info	Director and officer POPI consents	Hard copy or electronic format
Contracts & Legal	Shareholder Agreements	Hard copy or electronic format

## 5. Requesting Access to Records

5.1. If you want to have access to records that are not freely accessible to you, you must complete the prescribed Information Request Form contained in the Appendix. You must provide sufficient information to:

- 5.1.1. *enable us to identify the record(s) requested;*
- 5.1.2. *verify the identity of the requester;*
- 5.1.3. *if you are acting on behalf of the requester, to enable us to confirm that you have authority to do so;*
- 5.1.4. *confirm which form of access is required; and*
- 5.1.5. *details of the address at which we can contact you in writing in connection with your request;*

5.2. The completed form and supporting documents (if any) must be submitted to us at either of the addresses below to enable us to process the request:

<b>Email Address</b>	informationofficer@payat.co.za
<b>Postal Address</b>	PO Box 63, Stellenbosch, 7599

5.3. All requests are to be marked for the attention of “the Information Officer” and should contain “Application for PAIA Request” in the subject heading.

5.4. We will process your request upon receipt thereof and will inform you within 30 (thirty) days of our decision to grant or refuse the request. Please note that we may extend this period in certain circumstances (as determined under section 57 of PAIA), for instance if the request involves a large number of records. We will notify you if the period has been extended together with the reasons therefor.

## 6. Cross-Border Transfer of Personal Information

6.1. We may, from time to time, transfer personal information to third parties in foreign countries for legitimate business purposes, including but not limited to cloud storage, service providers, or international partners. Such transfers will only take place under the following conditions:

- The data subject has consented to the transfer
- The transfer is necessary for the performance of a contract between the data subject and Pay At Holdings, or for the implementation of pre-contractual measures taken in response to the data subject's request
- The transfer is necessary for the conclusion or performance of a contract concluded in the interest of the data subject between ourselves and a third party; or
- The transfer is for the benefit of the data subject, and it is not reasonably practicable to obtain the data subject's consent, and if it were reasonably practicable, the data subject would be likely to give such consent.

6.2. We will take reasonable steps to ensure that any third party to whom personal information is transferred is subject to laws, binding corporate rules, or binding agreements which provide an adequate level of protection for the personal information.

6.3. We will ensure that appropriate security measures are in place to protect the confidentiality, integrity, and availability of personal information during any cross-border transfer.

## 7. Refusals of Requests

7.1. Although we endeavour to respond to each request properly submitted to us, our failure to do so must be interpreted as a refusal of the request.

7.2. We may refuse your request in certain cases. The grounds upon which we may do so are set out in detail in Chapter 4 of PAIA. These grounds are *inter alia* if your request:

- 7.2.1. *would involve the unreasonable disclosure of personal information of a third party;*
- 7.2.2. *involves access to records which contain trade secrets, financial information or sensitive commercial or confidential information of a third party;*
- 7.2.3. *conflicts with a duty of confidence owed by us to any third party;*
- 7.2.4. *would compromise the safety or security of individuals or property;*
- 7.2.5. *involves access to records which are legally privileged or the subject of legal proceedings;*
- 7.2.6. *involves access to records which contain our trade secrets, financial information or sensitive commercial or confidential information.*

7.3. We do not have any internal appeal procedures that may be followed once a request to access information has been refused. The decision of our information officer is final. If you are not satisfied with the outcome of your request, you are entitled to apply to a court of competent jurisdiction to take the matter further.

## 8. Granting a Request

- 8.1. If we agree to provide you with access to any record, we may redact certain information from such record to the extent justified under PAIA.
- 8.2. If we agree to your request, you will be required to pay the prescribed fees. Such fees are based on the fees prescribed by the SAHRC from time to time. The fees are currently as set out in clause 9 below.
- 8.3. We will grant access to records to the extent that such records contain personal information about the requester. You will in such a case only be charged the prescribed fees for reproduction of the requested information.
- 8.4. We are not obliged to grant access to the records containing information relating to third parties, and will only do so if you have grounds to request such access under PAIA. If we do agree to provide you with access, you may be required to pay a request fee as well as an access fee.

## 9. Fees

- 9.1. PAIA provides for:

9.1.1. *a standard request fee; and*

9.1.2. *access fees, calculated by taking into account reproduction costs, search and preparation time and costs, as well as postal costs (to the extent applicable).*

- 9.2. Following receipt of your request we will notify you of the fees applicable to your request. We are not obliged to continue processing your request or to provide you with access to the requested records until we have received payment.
- 9.3. Where we receive a request for access to information and we are of the opinion that the preparation of the required record of disclosure will take more than 6 (six) hours, you will be required to pay a deposit. The amount of the deposit is equal to 1/3 (one third) of the amount of the applicable access fee.
- 9.4. If the search for the record has been made and the preparation of the record for disclosure, including arrangement to make it available in the requested form, requires more than the hours prescribed in the regulations for this purpose, we may require that you pay a deposit of the prescribed portion of the access fee which would be payable if the request is granted.
- 9.5. We will repay the deposit made in terms of 9.3 and/or 9.4 if your request for access to the records is subsequently denied.
- 9.6. If your request for access to a record has been granted, you will be required to pay fees for reproduction, search and preparation of the record containing the information, and for any time reasonably required in excess of the prescribed hours to search for and prepare such records for disclosure including making arrangements to make it available in the requested form.

#### 9.7. Fees: -

- 9.7.1. *to request access to any record held by us you will (unless you are a “personal requester” within the meaning of clause 8.3 above) be required to pay an amount of R 50,00 (fifty rand) upfront before we process your request; and*
- 9.7.2. *an access fee is payable in all instances where a request for access to information is granted, except in those instances where payment of an access fee is specifically excluded in terms of PAIA or by the Minister in terms of Section 54(8) of PAIA. Access fees are as follows:*

Applicable access fees for search, reproduction and delivery are:

Information in an A-4 size page photocopy or part thereof	R1,10
A printed copy of an A4-size page or part thereof	R0,75
A copy in computer-readable format on Flash Drive	R70,00
A transcription of visual images, in an A4-size page or part thereof	R40,00
A copy of visual images	R60,00
A transcription of an audio record, in an A4-size page or part thereof	R20,00
A copy of an audio record	R30,00
A search for a record that must be disclosed *Per hour or part of an hour reasonably required for such search.	R30,00*
Where a copy of a record needs to be posted the actual postal fee is payable	

Note: In terms of regulation 8, Value Added Tax (VAT) must be added to all fees prescribed in terms of the Regulations.

## 10. Records available in accordance with South Africa Legislation

We hold records in accordance with the following legislation:

Basic Conditions of Employment Act No. 75 of 1997
Companies Act No. 71 of 2008
Employment Equity Act No. 55 of 1998
Financial Advisory and Intermediary Services Act No. 37 of 2002
Financial Intelligence Centre Act 38 of 2001
Income Tax Act No. 95 of 1967



Labour Relations Act No. 66 of 1995
National Payment Systems Act No. 78 of 1998
Promotion of Access to Information Act No. 2 of 2000
Unemployment Insurance Act No. 30 of 1966
Value Added Tax Act No. 89 of 1991

## APPENDIX

## FORM 2

## REQUEST FOR ACCESS TO RECORD

[Regulation 7]

**NOTE:**

1. Proof of identity must be attached by the requester.
2. If requests made on behalf of another person, proof of such authorisation, must be attached to this form.

**TO:** The Information Officer – Marlinda de Klerk

Suite 4, Old College Building,

35 Church Street,

Stellenbosch, 7600

E-mail address:

Fax number:

Mark with an "X"

☐ Request is made in my own name      ☐ Request is made on behalf of another person.

PERSONAL INFORMATION	
Full Names	
Identity Number	
Capacity in which request is made (when made on behalf of another person)	
Postal Address	
Street Address	
Email Address	
Contact Numbers	Tel. (B): <span style="float: right;">Facsimile:</span>
	Cellular:
Full names of person on whose behalf	

request is made (if applicable):	
Identity Number	
Postal Address	
Street Address	
E-mail Address	
Contact Numbers	<div>Tel. (B):</div> <div>Facsimile:</div>
	Cellular:
<p align="center"><b>PARTICULARS OF RECORD REQUESTED</b></p> <p>Provide full particulars of the record to which access is requested, including the reference number if that is known to you, to enable the record to be located. (If the provided space is inadequate, please continue on a separate page and attach it to this form. All additional pages must be signed.)</p>	
Description of record or relevant part of the record:	
Reference number, if available:	
Any further particulars of record:	

<p align="center"><b>TYPE OF RECORD</b></p> <p align="center">(Mark the applicable box with an "X")</p>	
Record is in written or printed form	
Record comprises virtual images (this includes photographs, slides, video recordings, computer-generated images, sketches, etc)	
Record consists of recorded words or information which can be reproduced in sound	
Record is held on a computer or in an electronic, or machine-readable form	

<b>FORM OF ACCESS</b> (Mark the applicable box with an "X")	
Printed copy of record (including copies of any virtual images, transcriptions and information held on computer or in an electronic or machine-readable form)	
Written or printed transcription of virtual images (this includes photographs, slides, video recordings, computer-generated images, sketches, etc)	
Transcription of soundtrack (written or printed document)	
Copy of record on flash drive (including virtual images and soundtracks)	
Copy of record on compact disc drive (including virtual images and soundtracks)	
Copy of record saved on cloud storage server	

<b>MANNER OF ACCESS</b> (Mark the applicable box with an "X")	
Personal inspection of record at registered address of public/private body (including listening to recorded words, information which can be reproduced in sound, or information held on computer or in an electronic or machine-readable form)	
Postal services to postal address	
Postal services to street address	
Courier service to street address	
Facsimile of information in written or printed format (including transcriptions)	
E-mail of information (including soundtracks if possible)	
Cloud share/file transfer	
Preferred language (Note that if the record is not available in the language you prefer, access may be granted in the language in which the record is available)	

<b>PARTICULARS OF RIGHT TO BE EXERCISED OR PROTECTED</b>	
If the provided space is inadequate, please continue on a separate page and attach it to this Form. The requester must sign all the additional pages.	
Indicate which right is to be exercised or protected	
Explain why the record requested is required for the exercise or protection of the aforementioned right:	

FEES	
a) A request fee must be paid before the request will be considered. b) You will be notified of the amount of the access fee to be paid. c) The fee payable for access to a record depends on the form in which access is required  and the reasonable time required to search for and prepare a record. d) If you qualify for exemption of the payment of any fee, please state the reason for exemption	
Reason	

You will be notified in writing whether your request has been approved or denied and if approved the costs relating to your request, if any. Please indicate your preferred manner of correspondence:

Postal address: \_\_\_\_\_

Facsimile: \_\_\_\_\_

Electronic communication: \_\_\_\_\_

(Please specify)

Signed at \_\_\_\_\_ this \_\_\_\_\_ day of \_\_\_\_\_ 20 \_\_\_\_\_

\_\_\_\_\_  
**Signature of Requester /  
 Person on whose behalf request is made**

FOR OFFICIAL USE	
Reference number:	
Request received by: (State Rank, Name And Surname of Information Officer)	
Date received:	
Access fees:	
Deposit (if any):	

\_\_\_\_\_  
**Signature of Information Office**