



## PAIA MANUAL

This is the Promotion of Access to Information Manual of Peach Payment Services Proprietary Limited ("Peach Payments" or "Peach"), prepared in terms of the Promotion of Access to Information Act No. 2 of 2000 (as amended).

### COMPANY DETAILS

<b>Company Name</b>	Peach Payment Services Proprietary Limited
<b>Registration No.</b>	2012/076633/07
<b>Street Address:</b>	Brickfield Canvas, 35 Brickfield Road, Woodstock, 7925, Cape Town
<b>Postal Address</b>	Brickfield Canvas, 35 Brickfield Road, Woodstock, 7925, Cape Town
<b>Telephone:</b>	021 200 5877
<b>E-mail:</b>	privacy@peachpayments.com

### DEFINITIONS

<b>PAIA</b>	Promotion of Access to Information Act 2 of 2000
<b>POPI</b>	Protection of Personal Information Act 4 of 2013
<b>Information Regulator</b>	The Office of the Information Regulator established, in terms of section 39 of POPIA, to monitor and enforce compliance with both POPIA and PAIA.
<b>Information Officer</b>	The Information Officer is the person authorised to handle Requests for Access on behalf of Peach
<b>Deputy Information Officer</b>	The Deputy Information Officer is the person delegated by the Information Officer to assist the Requester with their Personal Information Request, and to whom the Information Officer can delegate other PAIA and POPI powers to.
<b>Requester</b>	Means any person making a Request for Access to a Record of the organisation in terms of PAIA or a person acting on behalf of such person
<b>Personal Information</b>	Means information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person
<b>Request For Access</b>	Means a request for access to a Record of the organisation in terms of section 50 of PAIA

<b>Record</b>	A Record is any recorded information regardless of the form, including, for example, written documents, audio, digital and video materials. A Record requested from a public or private body refers to a Record that is in that body's possession regardless of whether that body created the Record.
<b>Third Party</b>	In relation to a Request for Access to a Record held by the organisation, means any person other than the Requester
<b>Processing</b>	Any operation or activity or any set of operations, whether or not by automatic means, concerning Personal Information, including the collection, receipt, recording, organisation, collation, storage, updating or modification, retrieval, alteration, consultation or use, dissemination by means of transmission, distribution or making available in any other form, or merging, linking, as well as restriction, degradation, erasure or destruction of information
<b>Data Subject</b>	The person to whom Personal Information relates

## PAIA GUIDE

The right of access to information is protected in South Africa's Constitution, and PAIA gives effect to this right. The aim of PAIA is to foster a culture of transparency and accountability in public and private bodies and enables the South African people to exercise and protect all their rights and to realise South Africa's goals of an open and participatory democracy.

The Information Regulator of South Africa has put together a guide ("**Guide**") on PAIA, which has been designed as a user-friendly and accessible tool for any person who wishes to exercise any right in terms of PAIA, or in terms of POPI.

A copy of the Guide is available on the Information Regulator's website (<https://www.inforegulator.org.za>).

## PURPOSE OF PAIA MANUAL

This PAIA Manual is useful for the public to:

- check the categories of Records held by a body which are available without a person having to submit a formal PAIA request;
- have a sufficient understanding of how to make a Request for Access to a Record of the body, by providing a description of the subjects on which the body holds Records and the categories of Records held on each subject;
- know the description of the Records of the body which are available in accordance with any other legislation;
- access all the relevant contact details of the Information Officer and Deputy Information Officer who will assist the public with the Records they intend to access;
- know the description of the guide on how to use PAIA, as updated by the Information Regulator and how to obtain access to it;
- know if the body will process Personal Information, the purpose of Processing of Personal Information and the description of the categories of Data Subjects and of the information or

categories of information relating thereto;

- know the description of the categories of Data Subjects and of the information or categories of information relating thereto;
- know the recipients or categories of recipients to whom the Personal Information may be supplied; know the recipients or categories of recipients to whom the Personal Information may be supplied;
- know if the body has planned to transfer or process Personal Information outside the Republic of South Africa and the recipients or categories of recipients to whom the Personal Information may be supplied; and
- know whether the body has appropriate security measures to ensure the confidentiality, integrity and availability of the Personal Information which is to be Processed.

### **WHAT RECORDS ARE AVAILABLE WITHOUT A FORMAL PAIA REQUEST?**

Please have a look around at our website, <https://peachpayments.com> – various information is available, such as:

- Product Information, and standardised pricing
- Terms and Conditions and Privacy Policy
- Technical documentation
- Company information, job vacancies
- This PAIA Manual

### **WHAT RECORDS ARE AVAILABLE IN TERMS OF OTHER LEGISLATION?**

Records are kept in accordance with all legislation applicable to Peach Payments. The specific Records which are available are set out in that legislation. These Records may in certain instances be protected or confidential, only accessible by the persons specified in the relevant legislation, or subject to certain processes or procedures. A non-exhaustive list of such Records appears below.

<b>Category of Records</b>	<b>Applicable legislation</b>
PAIA Manual	Promotion of Access to Information Act 2 of 2000
Memorandum of Incorporation	Companies Act 71 of 2008
Employment Records and HR information	Labour Relations Act 66 of 1995, Basic Conditions of Employment Act 75 of 1997, Employment Equity Act 55 of 1998, Unemployment Insurance Act 63 of 2001, Compensation of Occupational Injuries and Diseases Act 130 of 1993
Financial Records and tax compliance	Income Tax Act 58 of 1962, Tax Administration Act 28 of 2011, Value-Added Tax Act 89 of 1991
Operations and payments administration	Electronic Communications and Transactions Act 25 of 2002, National Payment System Act 78 of 1998
Health and Safety Records	Occupational Health and Safety Act 85 of 1993

## DUTIES OF THE INFORMATION OFFICER

The Information Officer and/or the Deputy Information Officer of the organisation are responsible for:

- Publishing and proper communication of the manual i.e. creating policy awareness
- The facilitation of any Request for Access.
- Providing adequate notice and feedback to the Requester.
- Determining whether to grant a Request for Access to a complete/full Record or only part of a Record.
- Ensuring that access to a Record, where so granted, is provided timeously and in the correct format.
- Reviewing the policy for accuracy and communicating any amendment.

## INFORMATION OFFICER

The CEO, Rahul Jain, in terms of PAIA, is the Information Officer of Peach Payments. However, it is recommended that the Deputy Information Officer/s be used as a contact person for the purpose of this manual.

## DEPUTY INFORMATION OFFICERS' DETAILS

Names:

- Candice Waldegrave,
- Juliette Thirsk,
- Judy Winn

Telephone Number: 021 200 5877

E-mail address: [privacy@peachpayments.com](mailto:privacy@peachpayments.com)

Postal Address: Brickfield Canvas, 35 Brickfield Road Woodstock, Cape Town, 7925

## HOW TO REQUEST ACCESS TO A RECORD?

Peach Payments is a private body. In terms of PAIA, requests for information must be submitted using "Form 2", as prescribed in the PAIA Regulations, which is available on the Information Regulator website (<https://www.inforegulator.org.za>). All Requests for Access must be directed to our Information Officer (whose details appear at the top of this Manual).

Please note that, in accordance with PAIA regulations, fees may be payable, including a request fee and an access fee. These fees are subject to prescribed maximums and certain exemptions may apply. The fee structure is available on the Information Regulator website (<https://www.inforegulator.org.za>).

When submitting a Request for Access:

- you must state which right you are seeking to exercise or protect by requesting the information;
- if you are requesting access to any of your Personal Information which may be held by us, you must produce adequate proof of your identity; and
- provide sufficient detail to allow us to identify the Records you seek.

## SUBJECTS AND CATEGORIES OF RECORDS

We hold Records on the following subjects and categories:

<b>Subjects</b>	<b>Categories</b>
Company Records	Incorporation documents, directors register, share register, register of auditors, written resolutions, minutes of board meetings
Business Records	Operational Records and manuals, databases, internal correspondence, product Records and documentation relating to systems, solutions, information technology, and intellectual property
Financial Records	Financial statements, management accounts, tax returns, banking Records and statements, asset register, invoices, financial agreements
Insurance Records	Insurance policies
Income Tax Records	PAYE, company tax, documents issued to employees for PAYE purposes, Records of payments made to SARS on behalf of employees, skills development levies, UIF contributions
Personnel Records	Employee lists, Personal Information, employment contracts, applications, policies and procedures, employment equity plan, health and safety Records, salaries, leave Records, internal evaluations, disciplinary Records
Agreements	Merchant agreements, Payment Partner and Acquirer Agreements, NDAs, Contracts for Goods or Services, Rental Agreements
Merchant (Customer) Information	Merchant details, representative details, communications, billing information, transaction details, merchant customer information, website URL, high-risk and prohibited industries list, customer acceptance procedures, marketing Records, public customer information, performance Records, marketing strategies, client database.
Compliance and Regulatory Records	FICA registration documents, RMCP (Risk Management and Compliance Programme) and supporting policies (AML, Sanctions, Transaction Monitoring, Customer Acceptance), Audits, Regulatory licenses (PASA, TPPP), and Regulatory Correspondence.

## **PERSONAL INFORMATION**

Please refer to our [Privacy Policy](#) for a comprehensive outline of how we process Personal Information, as contemplated in POPI. However, please note the following in respect of Personal Information processed by us:

### ***Purpose.***

We process Personal Information to pursue our business objectives and strategies, including as may be required to:

- provide our payment processing services;
- facilitate our business relationships with payment method providers;
- contact our customers and partners;
- manage employees;
- comply with our financial, regulatory and other legal obligations;
- pursue our legitimate business interests including the performance of risk assessments, data analysis, testing, and product development.

### ***Categories of Data Subjects and Information***

We process Personal Information of:

- our employees (personal details, salary details, leave Records, disciplinary information, performance reviews, employment contracts);
- merchants (merchant details, contracts, representative details and contact information, bank details, invoices, transaction Records and volumes, certain customer details submitted as part of transaction, analytics, correspondence, support tickets, website information, technical integration data);
- payment partners (contracts, invoices, technical integration data, partner information, contact details, billing information, pricing, product information, or providing aggregated reports);
- technical or referral partners, and service providers (contact details, billing information, invoices, technical integration data, product information).

### ***Recipients of Personal Information***

Personal Information may be shared with:

- our employees on a need-to-know basis or other members of the Peach Payments corporate family for internal administrative purposes;
- service providers that provide services on our behalf such as identity verification services, website hosting, data analysis, information technology and related infrastructure, customer service and auditing services;
- third party business partners when this is necessary to provide our payment processing services;
- as may be required by law, any regulator, or the rules of any card scheme.

### ***Transborder Flows***

Our operational and payment processing infrastructure is cloud-based and hosted primarily on Amazon Web Services (AWS) servers in Ireland. Personal Information may also be transferred or accessed by payment partners and banks in other jurisdictions where merchants accept international cards or cross-border payments.

All transfers comply with POPI requirements, ensuring that adequate protection and contractual safeguards are in place before Personal Information is transferred outside South Africa

### ***Information Security Measures***

We have put in place a range of technical and organizational measures designed to protect Personal Information within our organization against unauthorized access, destruction, loss, alteration or misuse. The types of security measures implemented by us to ensure that personal Information is respected

and protected included:

- PCI-DSS controls to protect cardholder data;
- Network firewalls, intrusion-detection and malware prevention tools;
- Strict user-access and authentication controls (including 2-factor authentication);
- Malicious software detection;
- Role-based access controls for specific functions, such as payouts;
- Staff training on data protection and confidentiality obligations;
- Incident response and breach notification procedures aligned with POPI requirements; and
- Merchant-managed API key rotation;
- Continuous monitoring and logging of system activity;
- Regular vulnerability assessments and penetration testing;
- Backup and disaster-recovery systems to ensure availability;
- Webhook security through merchant-side IP allowlisting;
- Data encryption.

Issued by:

*Rahul Jain*

Rahul Jain (08 June, 2026 10:35:55 UTC)

Rahul Jain

CEO

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