



SPS I3 - PAIA Manual

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1 This Document

1.1 Version Control

Version	Date	Description	Author
1.0	2025/07/10	Initial Draft	Andre Wilson

1.2 Terms

This document makes use of the following terms and abbreviations:

Term	Meaning
SPS	Stanchion Payment Solutions (Pty) Ltd
CFO	Chief Finance Officer
COO	Chief Operating Officer

1.3 References

The following documents were referenced in the creation of this document:

#	Title and Version	Author and Comments
1	SPS ISP1 - Information Security Policy	Andre Wilson
2	SPS I4 - POPIA Policy	Andre Wilson

1.4 Interpretations

“**SPS Group**” means the entities more fully set out and shall mean each of the below-mentioned entities, as the context may indicate.

#	Company Name	REG Number	REGISTERED ADDRESS	Jurisdiction
1	Stanchion Payment Solutions Africa (Pty) Ltd	2011/142194/07	6th Floor, The Edge, 3 Howick Close, Tyger Falls, Bellville, 7530, Cape Town, South Africa	South Africa
2	Stanchion Payment Solutions (Pty) Ltd	2009/000700/07	6th Floor, The Edge, 3 Howick Close, Tyger Falls, Bellville, 7530, Cape Town, South Africa	South Africa

2 Background To the Promotion of Access to Information Act

The Promotion of Access to Information Act No 2 of 2000 as amended (the “Act”) was enacted to give effect to Section 32 of the Constitution of the Republic of South Africa No. 108 of 1996, which regulates the access of any information held by another person and that is required for the exercise or protection of any rights.

The Act sets out the procedural requirements attached to requests for information, the requirements which requests must meet as well as the grounds for refusing requests.



The Act also recognizes that the right to access information must be balanced with other rights and should be subject to limitations including, but not limited to, limitations aimed at the reasonable protection of privacy and commercial confidentiality.

In terms of Section 51 of the Act, all private bodies are required to compile an Information Manual ("PAIA Manual").

This Manual is in place to inform any person wishing to request access information held by SPS Group of the procedural and other requirements which a request for information must meet. When a request has been made in terms of the Act, SPS Group is obliged to release information subject to the applicable legislative and regulatory requirements except where the Act expressly provides that the information may or must not be released.

This Manual in its entirety is available for inspection, free of charge, at the SPS Group offices and website.

3 Purpose of the PAIA Manual

To promote effective governance, it is necessary to ensure that everyone is empowered and educated to understand their rights in terms of the Act, and to be able to exercise their rights in relation thereto.

4 South African Information Regulator Guide

South African Information Regulator, as directed by the Protection of Personal Information Act 4 of 2013 as amended ("POPIA"), is the custodian of PAIA manuals, (previously this was the responsibility of the South African Human Rights Commission) enquiries should be directed to:

- South African Information Regulator:
Email: enquiries@inforegulator.org.za
Address: Woodmead North Office Park, 54 Maxwell Drive Woodmead, Johannesburg, 2191
Website: <https://inforegulator.org.za/>

5 Records Automatically Available

Records of public nature may be accessed without the need to submit a formal request to the Information Officer. This information is automatically available, specifically disclosed on SPS Group's website, and does not have to be requested in terms of this Manual, namely SPS Group's Website Terms and Conditions and Privacy Policy.

6 Stanchion Payment Solutions Records

Where applicable to its operations, SPS Group also retains records or documents in terms of the legislation listed below. Unless disclosure is prohibited in terms of legislation, regulations or contractual agreements or otherwise, any records that are required to be made available for inspection by an interested party in terms of the requirements and conditions of the Act, such interested party shall be entitled to such information provided that the request to access the information is done in accordance with the Act.



- Basic Conditions of Employment Act 75 of 1997 as amended
- Companies Act 71 of 2008 as amended
- Compensation of Occupational Injuries and Diseases Act 130 of 1993 as amended
- Constitution of the Republic of South Africa
- Electronic Communications and Transactions Act 25 of 2002 as amended
- Employment Equity Act 55 of 1998 as amended
- Financial Intelligence Centre Act No 38 of 2001;
- Income Tax Act 58 of 1962 as amended
- Labour Relations Act 66 of 1995 as amended
- Occupational Health & Safety Act 85 of 1993 as amended
- Skills Development Levies Act 9 of 1999 as amended
- Unemployment Insurance Act 30 of 1966 as amended
- Value Added Tax Act 89 of 1991 as amended

Access to the documents as set out below may be subject to the grounds of refusal, which grounds of refusal are set out in clause 8 below.

6.1 Customer Records

A **"Customer"** in this Manual refers to a natural person or juristic entity that receives goods or services from the SPS Group. Customer records include any such records which may pertain to products sold and/or services rendered by SPS Group including but not limited to:

- Records provided by a third party and which are in the possession of SPS Group;
- Records supplied to a customer which are deemed confidential;
- Records generated by or within SPS Group relating to its customers.

6.2 Supplier Records

A **"Supplier"** in this Manual refers to a natural person or juristic entity that provides services or goods to SPS Group. Supplier records include the following:

- Any such records which may pertain to products bought and/or services received by SPS Group include;
 - Records provided by a third party, and which are in the possession of SPS Group;
 - Records provided by a supplier to a third party whilst the third party is acting for or on behalf of SPS Group;
 - Records generated by or within SPS Group relating to its suppliers.

6.3 Employee Records

"Employee" means any person who renders services to any entity within the SPS Group and who is entitled to receive remuneration due to services rendered which also includes but is not limited to directors, whether executive or non-executive, all permanent, temporary and part-time employees, as well as contract workers. E.g. of employee records, may include the following:

- Personal records which are provided by the Employee themselves and/or by any other third party;



- Internal evaluation records as well as other internal records;
- Conditions of the Personnel's employment and other personnel-related contractual and legal records;
- Correspondence relating to personnel; and
- Such training schedules, courses and material as have been provided from time to time, etc.

6.4 Private Body Records

"Private Body" in this Manual refers to SPS Group, and these are records which include, but are not limited to, records pertaining to the affairs of SPS Group, and which include:

- Operational records;
- Databases;
- Financial records;
- Information technology systems and documents;
- Internal correspondence;
- Marketing records;
- Product and/or service records;
- Statutory records;
- Documentation pertaining to the processing operations as required by section 17 of the Protection of Personal Information Act 4 for 2013 as amended; and
- Internal policies and procedures.

6.5 Records held by third parties and those which pertain to third parties

- Personnel, customer or private body records which are in the possession of another party on SPS Group's behalf.
- Records held by SPS Group pertaining to other parties, including, without limitation, correspondence, financial records, product and service records, contract records, and records which relate to SPS Group's suppliers, contractors and/or service providers.

7 Ground for the Refusal of Access to Records

SPS Group may refuse a request for information on, inter alia, the basis of any of the following, as provided for in terms of Chapter 4 of the POPI Act:

- The mandatory protection of the privacy of a third party who is a natural person, to avoid the unreasonable disclosure of personal information which concerns such natural person, irrespective of whether such person is alive or deceased at the time of such request.
- The mandatory protection of the commercial information of a third party, if the record contains:
 - Trade secrets pertaining to a third party;
 - Financial, commercial, scientific or technical information, other than trade secrets, of a third party, the disclosure of which would or could be likely to cause harm to the commercial or financial interests of that third party; or
 - Information supplied with confidence by a third party, the disclosure of which could reasonably be expected to put that third party at a disadvantage in contractual or other negotiations, or to prejudice that third party in commercial competition.
- The mandatory protection of confidential information of third parties if disclosure would constitute an action for breach of a duty of confidence owed to that third party in terms of an agreement.



- The mandatory protection of the safety of individuals, and the protection of property.
- The mandatory protection of records which would be privileged from disclosure in legal proceedings.
- The protection of SPS Group's commercial activities which shall include but are not limited to records which contain:
 - SPS Group's trade secrets;
 - Financial, commercial, customer, scientific or technical information, which, if disclosed, could or would be likely to cause harm to SPS Group's commercial or financial interests;
 - Information, the disclosure of which could reasonably be expected:
 - To put SPS Group at a disadvantage in contractual or other negotiations; or
 - To prejudice SPS Group in commercial competition.
 - Computer programs owned by SPS Group and defined as such in terms of the Copyright Act 98 of 1978.
- The mandatory protection of research information of SPS Group or a third party, if disclosure would expose the identity of SPS Group or the third party, the researcher or the subject matter of the research to serious disadvantage.
- Requests for information that are, in SPS Group's reasonable opinion, manifestly frivolous or vexatious or which involve a substantial and unreasonable diversion of resources.

8 Request for Information

- A request requiring access to information held by SPS Group is to make such a request in the prescribed form and submit the request, together with the prescribed fee and deposit, if applicable, to SPS Group's Information Officer at the post, physical or email address as set out in clause 4 above.
- The prescribed form is available on request from the Information Officer, and which must be completed with enough particularity to enable SPS Group to identify:
 - The record/s requested;
 - The identity of the requester;
 - The form of access required, if the request is granted;
 - The postal address, fax number or email address of the requester.
- The requester must:
 - State that the record is required to exercise or protect a right; and
 - Provide details of the nature of the right to be exercised or protected
- Subject to SPS Group's rights which pertain to any extension as set out in the Act relating to extensions in terms of the Act, it will process the request within 30 (thirty) days of receipt of a request unless the requester has submitted special reasons to SPS Group, which SPS Group's reasonable satisfaction, support that the above time periods be dispensed with.
- SPS Group will give the requestor written notice of its decision as to whether the request is granted, which written notice shall include the reasons for denying such request, should such a request be declined.
- The said 30 (thirty) day period may be extended for a further period not exceeding 30 (thirty) days if the request is for many records, or the request requires a search for information which cannot reasonably be obtained within the original 30 (thirty) day period. The Information Officer will notify the requester in writing should an extension be sought.
- If a request is made on behalf of another person, such a requester must submit to reasonable satisfaction of SPS Group, proof of the capacity in which the requester is making the request.
- If an individual is unable to submit a request in the prescribed form on account of illiteracy or disability, such a person is entitled to make the request orally.
- The requester is required to pay the prescribed fee, and deposit where applicable, before the request will be considered.



9 Access to Records

- In terms of the Act, a requestor will only be given access to a record held by SPS Group if:
 - The record is required for the exercise or protection of a right;
 - The requester has complied with all procedural requirements, set out herein and in terms of the Act, relating to a request for access to a particular record including making the request in the prescribed format; and
 - Access to that record is not refused on grounds of refusal as provided for in terms of the Act.

10 Remedies Available Should SPS Group Refuse a Request

- Internal Remedies
 - SPS Group does not have any internal appeal procedures.
- External Remedies
 - A requester or a third party, who is dissatisfied with the decision of SPS Group in relation to a request for access to a record may, within 30 (thirty) days of such decision apply to the High Court, or any other Court having jurisdiction, for relief.

11 Contact Details

Information Officer: Russell Clegg
Email: privacy@stanchionpayments.com
Phone: +27 21 461 6464
Postal Address: 6th Floor, The Edge, 3 Howick Close, Tyger Falls Blvd, Bellville, Cape Town, 7530

12 Corrective Action

SPS Group's Corrective and Preventive action Procedure will be activated if this procedure fails to meet the desired objectives.

13 Updating, Distribution and Communication of this document

The updating of this document can be initiated by the Document Owner following the procedure defined in the Document and Control of Records Process.

The distribution of this process document is circulated to the following people:

- CFO
- Head of IT
- Human Capital Manager

14 Management Review

Management should review the Risk Management Process on a continual improvement basis for suitability, adequacy, and effectiveness at least once every twelve months.



Reports required for the reviewing of input and output of this process are:

- Follow-up actions from previous management review meetings.
- Internal Audit Reports
- Risk Management toolkit.

The output from the Management Review will include:

- Improvements of the effectiveness of the Information Security Management Process and its processes
- Resources needed.
- Improvements to the process related to the provision of services to the business.