

THIS IS IT GROUP

PAIA MANUAL

This manual has been prepared in terms of Section 51 of the Promotion of Access to Information Act, 2 of 2000 and to address the requirements of the Protection of Personal Information Act, 4 of 2013

1. INTRODUCTION

The Promotion of Access to Information Act, 2 of 2000 ("PAIA") gives effect to the constitutional right of access to information held by private and public bodies. This PAIA Manual is compiled in accordance with Section 51 of PAIA and provides an outline of the records held by This Is It Group, as well as the procedure to request access to such records.

This manual also incorporates reference to the Protection of Personal Information Act, 4 of 2013 ("POPIA"), which regulates the processing of personal information.

2. COMPANY OVERVIEW

Registered Name: This Is It Group (PTY) Ltd

Industry: Technology, Software Development, Fintech, Digital Payments and Customer Experience (CX)

Nature of Business: Development, licensing and operation of software and SaaS platforms; fintech services including digital payments, wallets and transaction processing; API-based integrations; data-driven customer experience (CX) solutions; and related consulting and managed services.

Operating Models: Payments platforms, digital wallets, API services, SaaS platforms and cloud-based solutions.

Legal Status: Private Company

Physical Address: Cnr Leslie & William Nicol, 128 Leslie Avenue, Design Quarters, Building 2, Fourways, 2191

Postal Address:

Telephone Number: +27 65 101 1010

Email Address: hello@thisisit.group

Website: <https://thisisit.group>

3. INFORMATION OFFICER

In terms of PAIA and POPIA, the Information Officer of This Is It Group is:

Information Officer: Kgosi Khetsi

Position: Managing Director

Email: Kgosi@thisisit.group

Telephone: +27 65 101 1010

The Information Officer is responsible for compliance with PAIA and POPIA.

4. GUIDE ON HOW TO USE PAIA AND WHERE TO GET HELP

A guide on how to use PAIA is available from the Information Regulator:

Information Regulator (South Africa)

JD House, 27 Stiemens Street, Braamfontein, Johannesburg

PO Box 31533, Braamfontein, Johannesburg, 2017

Tel: +27 (0)10 023 5200

Email: infoereg@justice.gov.za

Website: www.justice.gov.za/infoereg

5. RECORDS AUTOMATICALLY AVAILABLE (SECTION 52{2})

The following records are automatically available without a formal PAIA request:

- Marketing and promotional material
- Public website information
- Company profiles and brochures
- Published media statements

6. CATEGORIES OF RECORDS HELD BY This Is It Group

This Is It Group holds records in the following categories relevant to its Technology, Software, Fintech and CX operations:

6.1 Corporate and Governance Records

- Company registration documents
- Memorandum of Incorporation (MOI)
- Shareholder and director records
- Board and committee minutes
- Policies and governance frameworks

6.2 Financial and Regulatory Records

- Audited and management financial statements
- Accounting and billing records
- Tax, VAT and statutory submissions
- Fintech compliance records (including FICA-related documentation where applicable)
- Banking and payment reconciliation records

6.3 Human Resources and Talent Records

- Employment contracts and consultancy agreements
- Employee personal information
- Payroll and benefits records
- Skills, training and certification records
- Performance management and disciplinary records

6.4 Client, User and Customer Records

- Client onboarding documentation
- Software licensing agreements
- Subscription records
- Customer support and CX interaction records
- Know Your Customer (KYC) information (where applicable)
- User account and authentication data

6.5 Software, Technology and IP Records

- Source code repositories
- System architecture and design documents
- Product roadmaps and technical specifications
- API documentation
- Intellectual property registrations and licenses

6.6 Fintech and Payment System Records

- Transaction logs
- Payment processing records
- Integration records with financial institutions
- Risk, fraud prevention and monitoring records
- Regulatory correspondence

6.7 Data, Analytics and CX Records

- Customer journey maps
- Analytics dashboards and reports
- User behaviour and engagement data
- Call centre, chatbot and omnichannel interaction logs

6.8 Information Security and IT Operations

- Access control and user permission records
- Cybersecurity policies and incident logs
- Data backup and disaster recovery records
- Cloud service and hosting agreements

6.9 Marketing, Sales and Communications

- Digital marketing campaigns
- CRM records
- Proposals and pitch documents
- Media releases and public communications

7. RECORDS HELD BY THIRD PARTIES

This Is It Group may hold records belonging to third parties, including:

- Banking institutions
- Legal advisors
- Accountants and auditors
- IT service providers

Access to these records may be subject to consent from the relevant third party.

8. PERSONAL INFORMATION PROCESSED (POPIA)

In the course of its Technology, Fintech and CX operations, This Is It Group processes personal information relating to:

- Employees and contractors
- Clients and client representatives
- End-users of software platforms and applications
- Customers and payment service users
- Suppliers, partners and service providers
- Website and application users

8.1 Categories of Personal Information

- Identity and contact information
- Employment and contractual data
- User credentials and authentication information
- Transactional and payment-related data
- Device, usage and behavioural data
- Customer interaction and support records

8.2 Purpose of Processing

- Provision and operation of software, fintech and CX services
- User authentication, security and fraud prevention
- Payment processing and transaction management
- Customer support and service improvement
- Legal, regulatory and contractual compliance
- Marketing and communications (subject to consent)

8.3 Data Protection Safeguards

This Is It Group implements appropriate technical and organisational measures, including:

- Encryption and access controls
- Secure cloud infrastructure
- Regular security assessments
- POPIA-compliant data governance practices

8.4 Data Subjects' Rights

Data subjects have the right to:

- Request access to personal information
- Request correction, deletion or restriction of processing
- Object to processing of personal information
- Lodge a complaint with the Information Regulator

9. REQUEST PROCEDURE FOR ACCESS TO RECORDS

9.1 Request Form

Requesters must complete the prescribed PAIA Form (Form C) available from the Department of Justice website.

9.2 Submission of Requests

Requests must be submitted to the Information Officer via email or post.

9.3 Fees

- Request fee (if applicable): R250.00
- Access fees will be charged according to the PAIA fee structure.

9.4 Timeframes

- Requests will be processed within 30 days, subject to PAIA provisions.

10. GROUNDS FOR REFUSAL OF ACCESS

Access to records may be refused in accordance with Chapter 4 of PAIA, including where access would:

- Unreasonably disclose personal information protected under POPIA
- Compromise confidential commercial, technical or proprietary information
- Expose fintech systems, payment platforms or security architecture to risk
- Prejudice intellectual property, trade secrets or source code
- Breach regulatory or contractual obligations with banks, payment partners or regulators
- Endanger the safety or security of systems, customers or employees

11. AVAILABILITY OF THE MANUAL

This PAIA Manual is available:

- On the This Is It Group website
- At the registered office of the company
- Upon request from the Information Officer

12. CROSS-BORDER DATA TRANSFERS

As a cloud-based fintech and SaaS provider, This Is It Group may store or process information outside the borders of the Republic of South Africa, including through international cloud service providers and technology partners.

Cross-border transfers are conducted in accordance with Section 72 of POPIA and only where:

- The recipient country has adequate data protection laws, or
- Binding agreements ensure an adequate level of protection, or
- The data subject has provided consent, or
- The transfer is necessary for contractual or legal performance.

13. UPDATES TO THIS MANUAL

This Is It Group reserves the right to update this PAIA Manual from time to time to ensure ongoing compliance with PAIA, POPIA and applicable fintech regulatory requirements.

Date of Compilation: September 2024

Last Updated: September 2024

Approved by: Kgosi Khetsi