



PIPERS ROAD
DOUGLASDALE
2191

KEPAY (PTY) LTD

Registration Number: 2026/535772/07

**STATUTORY MANUAL IN TERMS OF SECTION 51 OF THE PROMOTION OF ACCESS TO
INFORMATION ACT, NO. 2 OF 2000 ("PAIA") READ WITH THE PROTECTION OF PERSONAL
INFORMATION ACT, NO. 4 OF 2013 ("POPIA")**

DATE OF COMPLIANCE: 14 July 2026

VERSION CONTROL: V1

1. AN INTRODUCTION TO PAIA AND KEPAY

The Promotion of Access to Information Act, No. 2 of 2000 ("PAIA") gives effect to the constitutional right of access to any information held by the State or another person that is required for the exercise or protection of any rights.

KePAY (Pty) Ltd ("KePAY") operates a proprietary, hybrid zero-knowledge digital payslip delivery platform. KePAY acts primarily as an "Operator" under POPIA for its corporate clients, ingesting encrypted payroll data and facilitating automated notifications. This Manual outlines the categories of records held by KePAY, the security measures in place, and the legal procedures required for an external party to request access to this information.

2. COMPANY CONTACT DETAILS (SECTION 51(1)(a))

2.1 Head of the Private Body / Information Officer

- **Information Officer:** Thabang Mabote
- **Designation:** Chief Executive Officer (CEO)

2.2 Corporate Contact Parameters

- **Physical Address:** Pipers Road, Douglasdale, 2191
- **Postal Address:** Same as Physical Address
- **Direct Contact Number:** 072 605 3236
- **Official Corporate Email:** privacy@kepay.co.za
- **Official Website:** www.kepay.co.za

3. THE SOUTH AFRICAN HUMAN RIGHTS COMMISSION (SAHRC) GUIDE

The SAHRC (and subsequently the Information Regulator) has compiled a detailed, simple Guide in terms of Section 10 of PAIA. This Guide is designed to help any individual understand how to exercise their rights under the Act.

- The official Guide is accessible in all official South African languages.
- The public may inspect or clone this Guide directly from the Information Regulator's active portal at: info regulator.org.za.

4. RECORDS AUTOMATICALLY AVAILABLE WITHOUT REQUEST (SECTION 51(1)(c))

No formal PAIA request forms are required to view the following general information categories:

- Publicly accessible marketing collateral and product features on www.kepay.co.za.
- The KePAY End-User Privacy Notice.
- The active corporate registration status of KePAY (Pty) Ltd as disclosed via the CIPC registries.

5. RECORDS HELD IN ACCORDANCE WITH OTHER LEGISLATION (SECTION 51(1)(d))

Where applicable to our operations, KePAY maintains administrative records in accordance with the following statutory South African frameworks:

- Companies Act, No. 71 of 2008
- Electronic Communications and Transactions Act, No. 25 of 2002
- Protection of Personal Information Act, No. 4 of 2013
- Income Tax Act, No. 58 of 1962
- Value Added Tax Act, No. 89 of 1991
- Basic Conditions of Employment Act, No. 75 of 1997
- Financial Intelligence Centre Act, No. 38 of 2001 (FICA)

6. SUBJECTS AND CATEGORIES OF RECORDS HELD (SECTION 51(1)(e))

The records held by KePAY are grouped into specific corporate operational subjects:

6.1 Corporate & Administrative Governance

- Certified Company Registration documents (CoR 14.3, CoR 39, Custom MOI).
- Internal Securities and Share Register records.
- Minutes of the Board of Directors and Shareholder Resolutions.

6.2 Financial & Tax Operations

- Annual Financial Statements and internal operational ledgers.
- Value Added Tax (VAT) records and corporate income tax filings with SARS.
- Banking details, transaction records, and vendor invoices.

6.3 Human Resources & Co-Founder Governance

- Employment agreements and independent contractor frameworks.
- The Founder Vesting and Share Option Agreement
- Internal technical payroll registries for core staff.

6.4 Technical & Commercial Platforms

- Commercial Pilot Agreements, Master Service Level Agreements (SLAs), and Data Processing Agreements (DPAs) signed with corporate clients.
- System architecture diagrams, system audit summaries, and infrastructure logs.

7. PROCESSING OF PERSONAL INFORMATION AND POPIA COMPLIANCE

7.1 Purpose of Processing

KePAY processes Personal Information strictly to execute secure digital payslip delivery workflows, route automated notification alerts, maintain cloud network stability, and comply with South African taxation and corporate laws.

7.2 The "Two-Basket" Structural Data Bifurcation

To protect user rights, our data environments enforce strict separation of records:

- **Zero-Knowledge Payload Data:** Granular payroll data, bank account numbers, and salaries contained inside a payslip are encrypted immediately upon ingestion using AES-256. **KePAY holds no decryption keys, plaintext visibility, or indexable logs of Payload Data.** Consequently, KePAY cannot legally or technically grant access to, or retrieve, the content of any individual payslip under a PAIA request, as we do not possess it in readable form.
- **Encrypted Directory Metadata:** Basic matching and routing markers (full names, corporate or personal email addresses, mobile numbers, and personnel numbers) are encrypted at rest using AES-256 and used solely by automated machine scripts to deliver notifications.

7.3 Categories of Data Subjects and Information Held

- **Corporate Clients (The Entities):** Authorized registration names, VAT details, admin contact numbers, and corporate bank accounts.
- **End-Users (Employees of Clients):** Routing names, email destinations, SMS routing mobile inputs, and employee matching strings.
- **Core Staff & Directors:** Internal ID numbers, bank information, addresses, and tax numbers.

7.4 Planned Cross-Border Flows

KePAY prioritizes data sovereignty. All primary database instances, production systems, and matching files are hosted inside enterprise-grade cloud data centres located **strictly within the borders of the Republic of South Africa**. No personal data is systematically transferred across border lines.

7.5 Technical and Organizational Security Baseline

We protect our records through:

- Mandatory Multi-Factor Authentication (MFA) on all developer and administrator panels.
- Database-level Transparent Data Encryption (TDE) for Directory Metadata.
- Multi-signature (Multi-Sig) deployment gates to prevent unilateral codebase access.
- Tamper-proof, immutable auditing loops for all server environment interactions.

8. HOW TO SUBMIT A FORMAL ACCESS REQUEST (SECTION 53)

8.1 The Request Process

To initiate a request for information not automatically available, the requester must complete the official **Form 2 (Request for Access to Record)** issued by the Information Regulator.

- The requester must email the completed Form 2 directly to our Information Officer at **privacy@kepay.co.za**.
- The request must provide sufficient details to allow our team to identify the exact records requested, confirm the identity of the requester, and verify the specific right within South Africa that the requester is seeking to protect or exercise.

8.2 Payment of Prescribed Fees

- **Request Fee:** A standard, non-refundable administrative request fee is payable upfront before KePAY can process the application.
- **Access Fee:** If the request is approved, separate access fees will be calculated to cover the costs of reproduction, searching, and technical generation time.
- KePAY will issue an invoice detailing the exact bank account information. We reserve the right to withhold records until all statutory fees are paid in full.

9. AVAILABILITY AND EXPANSION OF THE MANUAL

This Manual is available for public download at www.kepay.co.za/paia. It will be regularly audited and updated by our Information Officer to reflect any changes to our platform's technical architecture, corporate address amendments, or shifts in South African statutory data privacy rules.