



Traderoot Technologies PAIA Manual

In terms of section 51 of the
Promotion of Access to Information Act 2 of 2000 (PAIA), as read
with the Protection of Personal Information Act 4 of 2013 (POPIA)

Version 1





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Background

Traderoot Technologies is a strategic fintech development company that offers software solutions that cross the entire value chain of financial systems, ranging from e-commerce payments to core banking and issuing. Traderoot Technologies solutions are used in diverse vertical markets, including payment processors, financial institutions, microfinance providers, fintech companies, national and regional payment systems, mobile network operators, lenders, and the retail, energy, health, travel and entertainment sectors.

During and throughout its business operations, Traderoot Technologies needs to gather and use certain information about natural and juristic persons (collectively referred to as "Data Subjects").

Any reference to "Traderoot" in this manual refers to Traderoot Technologies (Pty) Ltd, with registration number 2000/005984/07.

Document purpose, audience and scope

This manual is published in terms of section 51 of the Promotion of Access to Information Act (PAIA). PAIA gives effect to the constitutional right of access to information as set out in section 32 of the Constitution of the Republic of South Africa by prescribing and fostering a culture of transparency and accountability in private bodies (such as Traderoot), which in turn ensures all persons in society have effective access to information to enable them to exercise and protect their rights.

This manual provides an informative and user-friendly guide setting out the type of records and the personal information Traderoot holds, the availability of these records, and how Data Subjects, amongst others, can submit requests for access to these records.

Members of the public will find this manual specifically useful for the following reasons:

1. To establish the nature of the records which may be available at Traderoot, without the need for submitting a formal PAIA request
2. To have an understanding of how to make a request for access to a record of Traderoot
3. To access all the relevant contact details of the persons who will assist the public with the records they intend to access
4. To know all the remedies available to the public regarding request for access to the records, before approaching the Courts (or when the Courts can be approached)
5. To obtain an outline of the guide on how to use PAIA as formulated by the Information Regulator and how to obtain access to it
6. To understand if Traderoot will process Personal Information, the purpose of processing of such Personal Information, the description of the categories of Data Subjects and of the information or categories of information relating thereto
7. To know if Traderoot 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
8. To know whether Traderoot has appropriate security measures to ensure the confidentiality, integrity and availability of the information which is to be processed by it





Terminology

The following abbreviations, acronyms and specialised terms are used in this document:

Term	Definition
Data Subject	The person to whom Personal Information relates
Guide	Information Regulator's guide on how to use the PAIA
Head	In the case of a juristic person, the Chief Executive Officer or equivalent officer of the juristic person or any person duly authorised by that officer
Information Officer	In respect of a private body, the head of the private body as contemplated in Section 1 of PAIA
Manual	This manual, as prescribed by section 51 of PAIA
PAIA	The Promotion of Access to Information Act 2 of 2000, as amended
Personal Information	Personal information as defined under POPIA, specifically including any form of information that can be used to identify a Data Subject
Person	A natural person or a juristic person
Personnel	Any person who works for Traderoot and receives or is entitled to receive remuneration, and any other person who assists in carrying out or conducting the business of Traderoot, including, without limitation, Directors (executive and non-executive) and all permanent, temporary and part-time staff
POPIA	The Protection of Personal Information Act 4 of 2013, as amended
Private Body	A person, company or other kind of juristic entity that carries on a trade, business or profession, including a political party
Processing	Processing as defined under POPIA, specifically including the collection, receipt, recording, storage, alteration, use, dissemination, merging, linking, restriction, degradation, erasure or destruction of information ("Process" has a corresponding meaning.)
Record	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.
Requester	The person requesting access to information from Traderoot
Third Party	Any person other than the requester or Traderoot





Related documentation

This document makes reference to the following related documents:

Title	Version or date
Constitution of the Republic of South Africa, Act 108 of 1996	23/08/2013
Financial Intelligence Centre Act, No. 38 of 2001	18/08/2023
Information Regulator's Guide on How to Use the PAIA	16/11/2021
Promotion of Access to Information Act, Act 2 of 2000 (as amended)	30/06/2021
Protection of Personal Information Act, Act 4 of 2013 (as amended)	11/04/2014





Key Contact Details

Information Officer of Traderoot Technologies

PAIA prescribes the appointment of an Information Officer by Private Bodies (such as Traderoot) where such Information Officer is responsible to, inter alia, ensure compliance by Traderoot with the provisions of POPIA and PAIA, and deal with requests for access to information in terms of PAIA.

Traderoot Technologies has therefore duly appointed an Information Officer to oversee its required functions in terms of PAIA, amongst others. The Information Officer can be contacted as follows:

Name and Surname: Jan Ludik

Email: sales@traderoot.com

Tel: +27 (21) 551 5444

Head Office Address: Ground floor, Waterford House, Century Boulevard, 7441 Century City, Cape Town, Western Cape, South Africa

Information Regulator

The Information Regulator is a juristic person established in terms of Section 39 of POPIA and is empowered to, inter alia, monitor and enforce compliance by Private Bodies with the provisions of POPIA and PAIA, and handle complaints by Data Subjects about alleged violations of POPIA and PAIA. If you wish to contact the Information Regulator, the contact details are as follows:

Physical Address: JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001

Postal Address: P.O. Box 31533, Braamfontein, Johannesburg, 2017

Phone: 27 (0)10 023 5200

Complaints email: POPIAComplaints@inforegulator.org.za

General enquiries email: enquiries@inforegulator.org.za; helpdesk@inforegulator.org.za

Website: <https://inforegulator.org.za/>





Guide on How to Use PAIA

Section 10 of PAIA prescribes that the Information Regulator must update and make available the existing guide that has been compiled by the South African Human Rights Commission containing such information, in an easily comprehensible form and manner, as may reasonably be required by any person who wishes to exercise any right contemplated in PAIA or POPIA.

The Information Regulator has accordingly developed an updated guide for any person who wishes to exercise any right contemplated in PAIA and POPIA. The guide is available in each of the official languages of the Republic of South Africa and in braille.

What does the guide include?

The aforementioned guide sets out the following, inter alia:

1. The objects of PAIA and POPIA
2. The assistance available from the Information Regulator in terms of PAIA and POPIA
3. The type of information which can be requested by a Requester
4. The assistance available to Data Subjects on how to access their Personal Information in terms of Section 23 of POPIA
5. How to request access to records under PAIA
6. How Requesters can challenge the granting of access to their records or how to participate in the process of accessing their records
7. All remedies in law available to Data Subjects regarding breaches of the provisions of PAIA and POPIA, including the manner of lodging:
 - A complaint to the Information Regulator
 - An application with a court against a decision by the Information Officer or a decision by the Information Regulator
8. Categories of records that are automatically available to Data Subjects without having to request access
9. The fees involved in relation to requests for access

How to access the guide

The aforementioned guide can be obtained and accessed by either of the following means:

- From Traderoot, on request from the Information Officer using any of the contact channels listed herein
- From the website of the Information Regulator at <https://infoeregulator.org.za/paia-guidelines/>



The following table sets out the Data Subjects on which Traderoot holds records, as well as the categories of records held on each of those subjects:

Data Subject category	Category of records held
Personnel	Employment contracts and other personnel-related contractual records; statutory personnel records; records provided to Traderoot by personnel; correspondence in respect of Traderoot personnel; internal evaluation records on employees; training material; records provided by third parties related to personnel; retirement fund records; medical aid records; employees' leave records; disciplinary proceedings; records of incapacity proceedings; records of occupational injuries and diseases; other internal documents, including but not limited to resolutions and minutes of meetings of the Board of Directors.
Customer-related	Records provided to Traderoot directly by customers; records provided by a customer to a third party acting for or on behalf of Traderoot; internal records generated by Traderoot in respect of its customers; records provided by a third party; statutory-related records.
Traderoot company-related	Financial; operational; management; databases; information technology; marketing; internal policies and procedures; statutory records; products and services; company secretarial records, internal correspondence, records held by officials of Traderoot, including but not limited to lease agreements, asset registers, software licensing agreements, support and maintenance agreements, resolutions, annual financial statements, auditor reports, bank account statements, annual budgets or any other statutory-related records.
Third parties	Records provided directly by third parties to Traderoot; agreements with suppliers and service providers, lists of suppliers.

The above may not include public records which are available and accessible in the public domain.

Records available for access on request

The records listed in the preceding table may all be requested by a Data Subject in terms of the provisions of PAIA and the process set out in this manual. However, it is important to note that access to these records will not necessarily be provided in all instances, due to the nature of the information contained in the records and having due regard to the mandatory and discretionary grounds of refusal of access as set out in PAIA.

Records available for access without request

The following records can be accessed without a formal request for access:

- Records of a public nature and statutorily prescribed, which can typically be found on the Traderoot website at <https://traderoot.com/>, including, amongst others, this PAIA manual, and Traderoot's Privacy Policy.
- Other non-confidential records, such as statutory records maintained at the Companies and Intellectual Property Commission (CIPC), which may be accessed directly from the CIPC or other relevant body, or by an appointment with Traderoot's Information Officer.





Records available in accordance with any other legislation

Where applicable to its operations, Traderoot also keeps records and documents in terms of the legislation listed below. Unless disclosure is prohibited in terms of legislation, regulations issued under statutory Acts, contractual agreements or otherwise, the records that are required to be made available in terms of the respective legislation are available for inspection, subject to a request for access to these records in accordance with the provisions of PAIA. The respective legislation is as follows, although this list is not necessarily exhaustive:

- Basic Conditions of Employment Act No. 75 of 1997
- Broad Based Black Economic Empowerment Act, 2003
- Companies Act No. 71 of 2008
- Compensation of Occupational Injuries and Diseases Act No. 130 of 1993
- Competition Act No. 89 of 1998
- Constitution of the Republic of South Africa 2008
- Copyright Act No. 98 of 1978
- Customs and Excise Act No. 91 of 1964
- Cybercrimes Act No. 19 of 2020
- Debt Collectors' Act No. 114 of 1998
- Electronic Communications Act No. 36 of 2005
- Electronic Communications and Transactions Act No. 25 of 2002
- Employment Equity Act No. 55 of 1998
- Financial Advisory and Intermediary Services Act of 2002
- Financial Intelligence Centre Act No. 38 of 2000
- General Laws (Anti-Money Laundering and Combating Terrorism Financing) Amendment Act, 2022
- Income Tax Act No. 58 of 1962
- Insider Trading Act No. 135 of 1998
- Insolvency Act No. 28 of 1936
- Intellectual Property Laws Amendment Act No. 38 of 1997
- Inspection of Financial Institutions Act No. 18 of 1998
- Labour Relations Act No. 66 of 1995
- Leases of Land Act No. 18 of 1969
- Long Term Insurance Act No. 52 of 1998





- National Credit Act No. 34 of 2005
- Occupational Health and Safety Act No. 85 of 1993
- Patents Act No. 57 of 1978
- Pension Funds Act No. 24 of 1956
- Prescription Act No. 68 of 1969
- Prevention of Organised Crime Act No. 121 of 1998
- PAIA
- POPIA
- Revenue Laws Second Amendment Act. No 61 of 2008
- Skills Development Levies Act No. 9 of 1999
- Short-term Insurance Act No. 53 of 1998
- Stock Exchanges Control Act No. 1 of 1985
- Tax Administration Act, 2011
- Taxation Laws Amendment Act No. 7 of 2010
- Trademarks Act No. 194 of 1993
- Transfer Duty Act No 40 of 1949
- Uncertificated Securities Tax Act No. 31 of 1998
- Unemployment Contributions Act No. 63 of 2001
- Unemployment Insurance Act No. 30 of 1966
- Value Added Tax Act No. 89 of 1991

Procedure to obtain access to records

In terms of Section 50(1) of POPIA, any person can request access to a record of Traderoot, subject to the said record containing Personal Information about the Requester or the person on whose behalf the request is made.

The following is an outline of the process and requirements involved for Data Subjects to obtain access to a record in Traderoot's possession:

- The Requester must comply with all the procedural requirements contained in PAIA relating to the request for access to a record, or risk the request being refused.
- The request must be made on a form that corresponds substantially with Form 2 of Annexure A to the Regulations issued under POPIA. A copy of the form can be found on the Information Regulator's website at <https://inforegulator.org.za/paia-forms/>.





- The prescribed form must be completed with sufficient information to enable the Information Officer to consider the request. The prescribed form will indicate the information that is required. For further clarity in this regard, see Paragraph 14 of the Guide, and take specific note of the following:
 - The Requester should indicate which form of access is required and specify a postal address or email address of the Requester in the Republic of South Africa.
 - The Requester must state that they require the information in order to exercise or protect a right, and clearly state what the nature of the right is so to be exercised or protected. The Requester must clearly specify why the record is necessary to exercise or protect such a right, as contemplated in Section 53(2)(d) of PAIA.
- Proof of identity of a Requester must be attached to the request if it is in their own name. If a request is made on behalf of another person or entity, a Requester must attach proof of authorisation to make the request.
- The request must be made to Traderoot's Information Officer at the address or email address specified in this manual. If an individual is unable to complete the prescribed form because of illiteracy or disability, such a person may make the request orally by telecom or physical appointment with the Information Officer.
- Traderoot shall process the request within 30 days but may, in certain prescribed circumstances, require a further period of 30 days. Should the Information Officer require a further period of 30 days to process the request, this, and the reasons therefor, shall be communicated to the Requester within the first 30 day period after the request.
- The Requester shall be advised in writing on a form that corresponds substantially with Form 3 of Annexure A to the Regulations of POPIA, whether access is granted or refused. If, in addition, the Requester requires the reasons for the decision in any other manner, the Requester will be obliged to state which manner and the particulars required.
- Generally, prescribed fees are payable by the Requester both for making a request and to cover the cost of providing access to records in terms of a request. There are, however, some exceptions. The relevant payment details in respect of the prescribed fees will be communicated in writing by Traderoot's Information Officer to the Requester. More information regarding the respective fees payable by a Requester is available under the heading [Fees payable to facilitate access](#) in this manual.

Please take note that, if all reasonable steps have been taken to find a record requested, and there are reasonable grounds for believing that the record is in Traderoot's possession but cannot be found, or that it does not exist, Traderoot's Information Officer will notify the Requester by way of affidavit or affirmation that it is not possible to give access to that record.

Refusal of access to records

Although openness and transparency are the guiding principles underlying PAIA, PAIA nonetheless sets out 6 (six) circumstances (mandatory exemptions) in which access to records must be refused by a Private Body such as Traderoot. These circumstances are set out in Chapter 4 of Part 3 of PAIA and include the following:

1. If access would result in the unreasonable disclosure of Personal Information about a third party
2. If it is necessary to protect the commercial information of a third party, such as trade secrets, amongst others
3. If it is necessary to protect the confidential information of a third party, which for instance, will result in a breach of a duty of confidentiality owed to a third party in terms of an agreement
4. If it is necessary to protect property (including a computer or communication system) and the safety of individuals in the physical sense
5. If a record constitutes privileged information in legal proceedings in which the privilege has not been waived
6. If it is necessary to protect the research information of a third party





Notwithstanding the above, PAIA also sets out 2 (two) circumstances (discretionary exemptions) in which access to records may be refused by a private body such as Traderoot. These circumstances are also set out in Chapter 4 of Part 3 of PAIA and include the following:

1. If it is necessary to protect the commercial information of Traderoot, such as trade secrets, amongst others
2. If it is necessary to protect the research information of Traderoot

It is important to note that there are certain exemptions pertaining to the aforementioned exemptions. In other words, under certain circumstances, the exemptions listed above are not applicable.

Remedies available to Requester after decision on request

Traderoot does not have an internal appeal procedure available to a Requester after a decision by Traderoot, nor is this prescribed by PAIA. Accordingly, barring the possible legal remedies available to a Requester, which are discussed below, the decision by Traderoot upon a request is final.

The lack of an internal appeal procedure by Traderoot does not negate the legal remedies available to a Requester when said Requester is unsatisfied with a decision by Traderoot. Where a Requester is not satisfied by a decision made by Traderoot, they may, within 180 days of receiving the decision from Traderoot, either submit a complaint to the Information Regulator or apply to a court for relief. The court application can be made to a Magistrate's Court or a High Court of South Africa.

Complaints to the Information Regulator by a Requester (who is not a Third Party) may be lodged against any decision by Traderoot which involves the following:

- A refusal of a request for access
- A demand for payment of the request fee or a deposit of the access fee
- An extension of a period to deal with a request
- The granting of access in a particular form

A third party, on the other hand, may also lodge a complaint with the Information Regulator against a decision by Traderoot to grant a request for access to a record of Traderoot.

A complaint to the Information Regulator must be made in writing and a complaint form must be completed, either manually or online. The complaint form, being Form 5, can be downloaded from the Regulator's website at <https://www.justice.gov.za/infoereg/>.

Refer to Paragraph 24 of the Information Regulator's Guide on how to use PAIA for information regarding the following:

- Who can file an application to court against a decision by Traderoot or the Information Regulator
- When one can file an application to court against a decision by Traderoot or the Information Regulator
- The legal status of the Information Regulator's decision pending a decision of a court
- What orders the court may grant





Fees payable to facilitate access

Fees are payable both for making a request and to cover the cost of providing access to requested records. The following prescribed fees are applicable:

Item	Description	Amount
1	Request fee payable by every Requester	R140.00
2	Photocopy/printed black and white copy of A4-size page	R2.00
3	Printed copy of A4-size page	R2.00
4	For copy in a computer-readable form on: (i) Flash drive (to be provided by Requester)	R40.00
	(ii) Compact disc	R40.00
	- If provided by requestor - If provided to the requestor	R60.00
5	For a transcription of visual images, per A4-size page	Service to be outsourced, will depend on quotation from service provider
6	For a copy of visual images	Service to be outsourced, will depend on quotation from service provider
7	For a transcription of an audio record, per A4-size page	R24.00
8	For a copy of an audio record on: (i) Flash drive (to be provided by requestor)	R40.00
	(ii) Compact disk	R40.00
	- If provided by requestor - If provided to the requestor	R60.00
9	To search for and prepare the record for disclosure, for each hour or part of an hour, excluding the first hour, reasonably required for such search and preparation.	R145.00
	To not exceed a total cost of:	R435.00
10	Deposit: if search for record exceeds 6 hours	One third of amount per request, calculated in terms of items 2 to 8
11	Postage, email, or any other electronic transfer	Actual expense, if any

The request fee must be paid before a request will be considered.





Please note that Traderoot can request a deposit from the Requester, in a form corresponding substantially with Form 4 to the Regulations in terms of POPIA, but only if it is believed that the information or records requested will take more than 6 (six) hours to search for. The deposit amount cannot and will not be more than one-third of the relevant prescribed fee.

A Requester will be notified of the amount of the access fee. Please note that Traderoot is entitled to withhold a record until the required access fees have been paid.





Processing of Personal Information

The processing of Personal Information is regulated by POPIA. The purpose of POPIA is to give effect to the constitutional right of Data Subjects to privacy, and to ensure that all South African institutions conduct themselves in a responsible and lawful manner when collecting, processing, storing and sharing Personal Information of Data Subjects.

Traderoot is committed to protecting Data Subjects' privacy and recognises the importance of compliance with statutory requirements in the processing of Personal Information.

Purpose of processing

Traderoot processes Personal Information relating to both individuals and juristic persons, but only for specific, explicitly defined and lawful purposes, which purposes are communicated to the relevant Data Subject when Personal Information is collected directly from the Data Subject. Should it not be possible to communicate these purposes to the Data Subject, it shall be because a valid exemption is applicable.

Generally, Traderoot will use Personal Information for the purposes required to operate and manage its normal commercial operations, and these purposes may include one or more of the following:

1. For the purposes of providing its products and services to customers, which by their nature, require the processing of Personal Information of Data Subjects, albeit mostly in the capacity of a third party in relation to a Data Subject
2. Where relevant, for purposes of doing appropriate customer registration and credit vetting
3. Staff recruitment
4. For purposes of registering suppliers or service providers as approved suppliers or service providers of Traderoot; Traderoot will also process a service provider or supplier's Personal Information for purposes of performing the necessary due diligence checks
5. For purposes of the Know Your Customer (KYC) process according to the requirements of the Financial Intelligence Centre Act, No. 38 of 2001
6. For general procurement and supply purposes
7. For purposes of monitoring the use of Traderoot's electronic systems and online platforms by Data Subjects; Traderoot may, from time to time, engage third-party service providers, who will process the Data Subject's Personal Information on behalf of Traderoot, to facilitate this
8. For purposes of preventing, discovering and investigating violations of the applicable law and other Traderoot policies
9. In connection with the execution of payment processing functions, including payment of invoices to Traderoot's suppliers and service providers
10. For employment-related purposes such as administering payroll and performing background checks
11. In connection with internal audit purposes, ensuring that the appropriate internal controls are in place to mitigate risks, as well as to carry out any investigations where this is required
12. In connection with external audit purposes, for which Traderoot engages external service providers and, in so doing, shares Personal Information of the Data Subject with third parties





13. For secretarial purposes, for which Traderoot will, from time to time, collect information relating to Data Subjects from third parties such as the Companies and Intellectual Property Commission (CIPC)
14. For other purposes to which the Data Subject may consent from time to time
15. For other purposes as authorised in terms of applicable law
16. To comply with any applicable law or any query from government authorities, including any regulatory authority that has authority over Traderoot

Categories of Data Subjects and related information

The following table sets out the Data Subjects for which Traderoot may process Personal Information, as well as the categories of Personal Information potentially processed by Traderoot for each of those subjects:

Category of Data Subject	Nature or category of information that may be processed
Clients and customers	Name; address; registration numbers or identity numbers; birth date; registration documents; gender; bank details; financial information; online identifier; internet usage information, including Internet Protocol (IP) address; VAT number; credit information; system, software and hardware information; cookie preferences; contact details; language.
Service providers	Agreements; names; registration number; ID numbers; VAT numbers; addresses; trade secrets; bank details; licence keys; financial records; legal history information; online identifier; contact information; Internet Protocol (IP) address; language.
Employees, including independent contractors	Names; contact information; criminal history; gender; race; ID number; bank details; credit information; birth date; marital status; address; online identifier; browsing habits; educational history; biometric information; personal opinions, views and preferences; language; health status; disability status; pregnancy status; leave records; employment contracts; medical aid records; retirement fund records; performance management records; records of disciplinary hearings and findings; records of incapacity proceedings, including medical information; records of occupational injuries and diseases.
Third parties, including clients and customers of clients and customers	Bank account details; gender; race; birth date; ID number; registration number; name; credit information; internet usage information, including Internet Protocol (IP) address; biometric information; language.

Possible recipients of Personal Information

Traderoot may share Personal Information with:

1. Service providers under contract involved in Traderoot's business operations (fraud prevention, marketing, technology services)
Our contracts dictate that these service providers only use Personal Information in connection with the services they perform for Traderoot, to advance a lawful purpose, and not for their own benefit. Purposes may include data storage, auditing and training Traderoot employees.
2. Service providers or financial institutions that Traderoot partners with to jointly create and offer products and services





3. Companies that Traderoot plans to merge with or be acquired by
Should such a combination occur, we will require that the new combined entity comply with the provisions of POPIA with respect to Personal Information. If Personal Information could be used contrary to the provisions of POPIA, the Data Subject will receive prior notice.
4. Law enforcement, government officials, fraud detection agencies or other third parties, should Traderoot be compelled to do so by a subpoena, court order or similar legal procedure or in compliance with any law
5. Other third parties, with the consent or direction of the Data Subject

Traderoot will not sell or rent any Personal Information to third parties for marketing purposes, and will only share Personal Information with third parties in accordance with the provisions of POPIA.

Specific recipients of Personal Information may include credit bureaus, the South African Police Service, the South African Qualifications Authority, the South African Revenue Service, and the Companies and Intellectual Property Commission.

Cross-border flow of Personal Information

Traderoot may share Personal Information with companies within the group of companies to which Traderoot belongs, which may include companies registered in countries other than South Africa, so as to provide joint content and services like registration, transactional services and user support, to help detect and prevent potentially illegal acts and violations of Traderoot's policies and relevant legislation, and to guide decisions about Traderoot's products, services and communications.

Traderoot may also send Personal Information to a foreign jurisdiction outside of the Republic of South Africa, including for processing and storage by third parties.

When Personal Information is transferred by Traderoot to a jurisdiction outside of the Republic of South Africa including to any cloud, data centre or server located outside of South Africa, one or more of the following will be applicable to this cross-border flow of information:

1. The recipient is subject to a law, binding corporate rules or binding agreements that provide an adequate level of protection for the information
2. The Data Subject consents thereto
3. It is necessary for the performance of a contract between the Data Subject and Traderoot
4. It is necessary for the conclusion or performance of a contract concluded between Traderoot and a third party in the interest of the Data Subject
5. It is for the benefit of the Data Subject, and it is not reasonably practicable to obtain the Data Subject's consent, and such consent would be likely to be given in any event

The Data Subject should also take note that the processing of Personal Information in a foreign jurisdiction, if and to the extent such processing does occur, may be subject to the laws of the country in which the Personal Information is held, and may be subject to disclosure to the governments, courts of law, enforcement or regulatory agencies of such other country, pursuant to the laws of such country. Traderoot will ensure that adequate data protection and privacy legislation is in place in such other jurisdiction.





Information security measures put in place by Traderoot

Traderoot will ensure physical, organisational, contractual and technological security measures, having regard to generally accepted information security practices or industry-specific requirements or professional rules, to secure the integrity of Personal Information and guard against the risk of alteration, loss, damage, destruction or access by unauthorised third parties. Traderoot is committed to ensuring that information is only used for legitimate purposes, with client consent and only by authorised employees and third parties who have been disclosed.

Traderoot's security measures include data encryption using End-to-End Encryption, Derived Unique Key Per Transaction (DUKPT) encryption, truncation, software-based cryptography, restricted data storage, secure storage of data when necessary, limitation of personal hardware and permission controls, anti-virus programs, anti-malware solutions, access controls including comprehensive password controls, regular monitoring, email policies and training of employees, firewall protection and multifactor authentication (MFA).





Availability and Updating of this PAIA Manual

A copy of this manual is available on Traderoot's website at <https://traderoot.com/> and at our head office for public inspection during normal business hours to any person upon request and upon payment of a reasonable prescribed fee, as well as to the Information Regulator upon request.

A prescribed fee for a copy of this manual, as contemplated in Annexure B of the regulations to PAIA, shall be payable for each A4-size photocopy made.

The Information Officer will regularly update this manual when the need arises, for example due to changes in law or the identification of new risks.

This manual is only available in the English language.

