

PREPARED IN TERMS OF SECTION 51 OF PAIA & POPI ACT

PAIA Manual

Trendy Data Visibility (Pty) Limited — Reg. No. 2025/248218/07

Last updated: 17 September 2025

1. Introduction

Trendy Data Visibility (Pty) Limited (the “Company”) understands the importance of transparency and the Constitutional right of access to information and will do our utmost best to ensure that anyone who requires access to any record to fully exercise and protect their rights has access to the PAIA Guide prepared by the Regulator as well as assistance from us in undertaking the request process. The Company takes extreme care to ensure all the records we hold are protected from unlawful access and are processed in accordance with South African law. To this end, we have prepared this PAIA manual in accordance with the requirements of section 51 of PAIA to assist anyone where they seek to request access to information held by us under PAIA.

2. Definitions and Interpretation

In this manual, unless otherwise indicated by context, the following words and expressions bear the meanings assigned to them and cognate expressions bear corresponding meanings:

"IO" means Information Officer

"PAIA" means the Promotion of Access to Information Act, 2 of 2000, as amended

"POPI" means the Protection of Personal Information Act, 4 of 2013, as amended

"Regulator" means the Information Regulator established in terms of section 39 of POPI

"Regulations" means the regulations published in terms of section 92 of PAIA

"South Africa" means the Republic of South Africa

3. Purpose of PAIA Manual

The purpose of this PAIA manual is to assist anyone to:

1. review the categories of records we hold which are available without having to submit a formal PAIA request;
2. understand how to make a request for access to a record of ours, by providing a description of the subjects on which we hold records and the categories of records held under each subject;
3. review the types of records which are available in accordance with any other legislation;
4. access all the relevant contact details of the IO of the Company who will assist with the records anyone intends to access;
5. understand how to access the guide on how to use PAIA, as updated by the Regulator;
6. understand whether we will process personal information, the purposes for which we process personal information and the

description of the categories of data subjects and of the information or categories of information relating thereto;

7. distinguish the categories of data subjects and of the information or categories of information relating thereto;
8. identify the third parties to whom personal information may be supplied by us;
9. identify if we have planned to transfer or process personal information outside of South Africa and the parties to whom the personal information may be transferred; and
10. understand the appropriate security measures we employ to ensure the confidentiality, integrity, and availability of the personal information we process.

4. Guide on How to Use PAIA

The Regulator has, in terms of section 10(1) of PAIA, updated and made available the revised Guide on how to use PAIA ("PAIA Guide"), in an easily comprehensible form and manner, as may reasonably be required by a person who wishes to exercise any right contemplated in PAIA and POPI. The PAIA Guide is available in each of the official languages of South Africa and in braille.

The PAIA Guide contains the following:

- The objects of PAIA as well as POPI;
- How to access the postal address, telephone number and email address of every registered IO and deputy IO (if any) (for both public and private bodies);
- The manner and form of request for:

- access to a record of a public body contemplated in section 11 of PAIA; and
 - access to a record of a private body contemplated in section 50 of PAIA.
- the assistance available from the IO of a body in terms of PAIA and POPI;
- the assistance available from the Regulator in terms of PAIA and POPI;
- all remedies in law available regarding an act or failure to act in respect of a right or duty conferred or imposed by PAIA and POPI, including the manner of lodging:
 - an internal appeal;
 - a complaint to the Regulator; and
 - an application with a court against a decision by the IO of a public body, a decision on internal appeal or a decision by the Regulator or a decision of the head of a private body;
- the provisions of sections 14 and 51 of PAIA requiring a public body and private body, respectively, to compile a manual, and how to obtain access to a manual;
- the provisions of sections 15 and 52 of PAIA providing for the voluntary disclosure of categories of records by a public body and private body, respectively;
- the notices issued in terms of sections 22 and 54 of PAIA regarding fees to be paid in relation to requests for access; and
- the Regulations.

The PAIA Guide can be obtained:

- upon request to the Company's IO;

- from the website of the Regulator: <https://www.justice.gov.za/inforeg/>

A copy of the PAIA Guide is also available in the following two official languages, for public inspection during normal office hours: English and Zulu. Anyone can also inspect or make copies of the PAIA Guide from the office of the Regulator during normal working hours.

5. Contact Details for Access to Information

Information Officer

107 Dorp Street, Stellenbosch, Western Cape, 7600

071 181 6198

info@trendydatavisibility.com

Head Office

107 Dorp Street, Stellenbosch, Western Cape, 7600

www.trendydatavisibility.com

info@trendydatavisibility.com

6. Procedure to Request Access to Information

1. A request for access to information for a record held by the Company must be made on a form which corresponds substantially to that of Form 2 of the Regulations along with proof of payment of the prescribed fee to the Company's IO at the details listed in section 5.
2. When completing Form 2 or a form substantially similar, a requester must provide clear and accurate information and clearly state the right which the requestor seeks to exercise or protect, the record which they are seeking to access and an explanation as to how such record will assist them to exercise or protect their rights.

3. The Company has 30 (thirty) days within which to respond to any request received. Once a decision has been made, the Company's IO will inform a requester of their decision whether to grant or refuse a request and any fees payable on a form that corresponds substantially to that of Form 3 of the Regulations.
4. The Company may refuse a request for access to a record on any of the grounds listed in Chapter 4 of PAIA (which are listed in the PAIA Guide).
5. A requestor is required to pay the request fee before a request will be processed. The request fee is listed in Annexure B to the Regulations. The current request fee payable is **R140.00 (one hundred and forty Rand)** per request.
6. The request fee must be paid into the Company's nominated bank account, which details are available from our IO on request.

7. Remedies

1. If a requestor is unhappy with a decision made, they may submit a complaint to the Regulator.
2. A complaint to the Regulator must be made on a form which corresponds substantially to that of Form 5 of the Regulations. A complaint must be lodged within **180 (one hundred and eighty) days** of receipt of the decision from the Company.
3. The complaint will then follow the dispute resolution process described in the Regulations as well as the PAIA Guide.

8. Records Available Without Request

The following records are made freely available by the Company and do not require any request to access:

Category of Records	Types of Record	Where Available
Company Policies	Terms and Conditions of Use	On Website
Company Policies	Privacy Policy	On Website
Company Policies	PAIA Manual	On Website

9. Records Available in Accordance with Other Legislation

Category of Records	Applicable Legislation
Memorandum of Incorporation	Companies Act 71 of 2008
PAIA Manual	Promotion of Access to Information Act 2 of 2000
Privacy Policy	Protection of Personal Information Act 4 of 2013

10. Subjects and Categories of Records Held

Subject of Records	Categories of Records
Company	Memorandum of Incorporation; share certificates, resolutions, director
Secretarial	registrations, minutes of meetings, securities register
Human Resources	HR policies and procedures; available employment opportunities; employee records
Finance	Banking/bank account records; contractual agreements; accounting records; financial statements and reports; invoices
Insurance	Insurance policy documents

Subject of Records	Categories of Records
Intellectual Property	Trademarks, copyright, knowhow, and contractual agreements
Tax	Income tax records; contractual agreements
Property	Lease agreements
Commercial Agreements	Service level agreements; employee agreements; contractor agreements; client and supplier agreements
Information Technology	Software licenses; data protection measures; data retention formulae; breach recovery processes
Platform Integrations	OAuth tokens and access credentials for connected third-party platforms (Google Ads, Meta Marketing, Shopify, Sage Accounting, Xero); platform-sourced business performance data stored per user account

11. Processing of Personal Information

11.1 Purpose of Processing

The Company processes personal information for legitimate business purposes and as a necessary function of a client's engagement with our services with such client's express consent. We therefore process personal information in the following circumstances:

- to provide our services to clients and operate our business;
- to receive and accept services from independent contractors;
- to provide it to authorised third parties and service providers who need personal information to provide services to us or our clients;
- to provide it to mandated government authorities when instructed to do so for legal compliance only (such as the Income Tax Act, FICA etc);
- to improve experiences on our website through analytical data;

- to facilitate connections to third-party business platforms (Google Ads, Meta Marketing, Shopify, Sage Accounting, and Xero) on behalf of clients, and to sync and display platform performance data in the client's dashboard.

11.2 Data Subjects and Information Processed

As a responsible party, we process the following information from the following list of data subjects:

Data Subjects	Personal Information that may be processed
Clients	Information from on-boarding and use of services which may include personal information; contact details; business information; financial information; tax information; banking information; location information; company information; support enquiries; information about minors and any other personal and/or confidential information provided by clients. Platform Integration Data: Where clients connect third-party platforms, we also process business performance data sourced from those platforms on their behalf, including: advertising campaign metrics from Google Ads and Meta Marketing (spend, impressions, clicks, conversions); sales and customer data from Shopify (orders, products, customers); and financial records from Sage Accounting and Xero (invoices, payments, bank transactions, financial reports). This data belongs to the client and is processed solely to display it in their dashboard.
Service Providers / Vendors / Independent	Company information such as name, registration number, VAT information, registered address, and/or personal information such as full name, address, identity number, contact information, and information obtained from contractual agreements and in the provision of

Data Subjects	Personal Information that may be processed
Contractors / Sub-Contractors	goods/services such as trade secrets, confidential information, banking information and/or tax information and other personal information.
Employees / Possible Employees / Directors / Shareholders	Full name, identity documentation, address, contact information, educational qualifications (including curriculum vitae), gender, race, banking information, and tax information and other personal information.

11.3 Third Party Recipients to Whom We Share Personal Information

In accordance with our operational requirements, we share personal information with the following third parties:

Category of Personal Information	Recipients or Categories of Recipients
Identity, Contact, Marketing, Financial, Transactional, Contractual, Technical and Usage data.	Software used for business operation
Identity, Contact, Marketing, Financial, Transactional, Contractual, Technical and Usage data.	Accountants and Legal Advisors
Identity, Contact, Marketing, Financial, Transactional, Contractual, Technical and Usage data.	Third party service providers providing services to us or our clients
Platform performance data (advertising, sales, financial	Google LLC (Google Ads API): for syncing Google Ads campaign data. Use is limited to displaying data in the client's dashboard.

Category of Personal Information	Recipients or Categories of Recipients
metrics), read-only, sourced on behalf of the client.	Governed by the Google API Services User Data Policy.
Platform performance data (advertising metrics), read-only, sourced on behalf of the client.	Meta Platforms, Inc. (Meta Marketing API): for syncing Meta advertising campaign data. Used solely to display data in the client's dashboard.
Platform performance data (sales, orders, customers), sourced on behalf of the client.	Shopify Inc.: for syncing store sales data via a private custom app access token (polling; no webhooks). Used solely to display data in the client's dashboard.
Financial records (invoices, expenses), sourced on behalf of the client.	Sage Group plc (Sage Accounting API): for syncing accounting data. Credentials stored encrypted. Used solely to display data in the client's dashboard.
Financial records (invoices, payments, bank transactions, financial reports), read-only, sourced on behalf of the client.	Xero Limited (Xero Accounting API): for syncing accounting data via OAuth. Encrypted refresh token and tenant ID stored. Used solely to display data in the client's dashboard.
Payment transaction data.	Paystack (payment processing): for processing subscription payments.
Account and usage data.	Supabase Inc. (database and authentication): cloud database provider hosted on Google Cloud.

11.4 International Transfers

The Company may transfer personal information outside of South Africa in the following circumstances:

- Personal information which is stored using secure cloud servers hosted outside of South Africa;

- To engage with third parties or for purposes of providing any services;
- Personal information may be shared within the Company's group of companies or processed outside of South Africa by their employees, directors or agents as part of the group structure and operations;
- When syncing data from Google Ads, Meta Marketing, Shopify, Sage Accounting, or Xero, business performance data is transmitted via those platforms' international APIs and stored on our cloud infrastructure.

Whenever we transfer personal information out of South Africa, we will ensure a similar degree of protection is afforded to it by:

- only transferring personal information to countries that have appropriate data protection legislation in place similar to that of South Africa; and/or
- using specific contracts/clauses with service providers which ensure personal information is processed and secured lawfully.

You are welcome to contact us if you want further information regarding transfer of personal information out of South Africa.

11.5 Data Security

To prevent the personal information we process from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed we follow industry standard security measures. All information processed is also restricted to only those individuals who need access. OAuth tokens and access credentials for third-party platform integrations are stored using encryption at rest.

12. Availability of PAIA Manual

A copy of this PAIA Manual is available:

- on our website, at www.trendydatavisibility.com;
- at our office;
- to any person upon request and upon the payment of a reasonable prescribed fee; and
- to the Information Regulator upon request.

The fee for a copy of this PAIA Manual, as contemplated in Annexure B of the Regulations, shall be payable per each A4-size photocopy made.

13. Updates to This PAIA Manual

This PAIA Manual will be regularly updated by the Company's IO.

This PAIA Manual was last updated on **17 September 2025**.

Questions about this PAIA Manual?

Direct all enquiries to our Information Officer

info@trendydatavisibility.com