PAIA MANUAL

Prepared in terms of section 51 of the Promotion of Access to Information Act 2 of 2000 (as amended)

ORBIT LOYALTY (PTY) LTD

Registration number: 2026/259512/07

Date of compilation: 22 October 2026

1. ACRONYMS AND ABBREVIATIONS

1.1 In this manual:

1.1.1 "IO" means our Information Officer;

1.1.2 "Orbit", "we", "us" and "our" mean Orbit Loyalty (Pty) Ltd;

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

1.1.4 "POPIA" means the Protection of Personal Information Act 4 of 2013;

1.1.5 "Regulator" means the Information Regulator established under section 39 of POPIA; and

1.1.6 "Republic" means the Republic of South Africa.

2. PURPOSE OF THIS MANUAL

2.1 This manual is intended to help members of the public to:

2.1.1 identify the categories of records held by Orbit that are available without a formal request under PAIA;

2.1.2 understand how to make a request for access to a record held by Orbit, by providing a description of the subjects on which we hold records and the categories of records held on each subject;

2.1.3 know which records are available in accordance with other legislation;

2.1.4 access the contact details of our Information Officer;

2.1.5 learn about the description of the Guide on how to use PAIA, as updated by the Regulator, and how to obtain access to it;

2.1.6 know whether we process personal information, the purpose of that processing and the categories of data subjects concerned;

2.1.7 know the categories of personal information we process for each category of data subject;

2.1.8 know the recipients or categories of recipients to whom personal information may be supplied;

2.1.9 know whether we plan to transfer or process personal information outside the Republic, and the recipients concerned; and

2.1.10 know whether we have appropriate security measures in place to ensure the confidentiality, integrity and availability of the personal information we process.

3. ABOUT ORBIT

3.1 Orbit is a software-as-a-service provider. We provide a loyalty programme platform to our clients, who own and run their own loyalty programmes under their own brands. In terms of POPIA, each client is the responsible party for the personal information of its loyalty programme members, and Orbit processes that information as the client's operator, on the client's documented instructions.

4. KEY CONTACT DETAILS FOR ACCESS TO INFORMATION

4.1 Information Officer: Niehaus Loots. Telephone: 010 143 0305. Email: privacy@orbitloyalty.co.za.

4.2 Deputy Information Officer: none has been designated as at the date of this manual.

4.3 General access to information contact: privacy@orbitloyalty.co.za.

4.4 Registered office (postal and physical address): Unit S3, Executive City, Cnr Cross Street & Charmaine Avenue, President Ridge, Randburg, 2194.

4.5 Principal place of business: 124 High Level Road, Three Anchor Bay, Cape Town, 8005.

4.6 Telephone: 010 143 0305. Website: www.orbitloyalty.co.za.

5. GUIDE ON HOW TO USE PAIA

5.1 The Regulator has, in terms of section 10(1) of PAIA, updated and made available a Guide on how to use 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 POPIA. The Guide is available in each of the official languages and in braille.

5.2 The Guide contains a description of:

5.2.1 the objects of PAIA and POPIA;

5.2.2 the postal and street address, phone and fax number and, if available, electronic mail address of the information officer of every public body, and of every deputy information officer of every public and private body designated in terms of section 17(1) of PAIA and section 56 of POPIA;

5.2.3 the manner and form of a 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;

5.2.4 the assistance available from the information officer of a public body in terms of PAIA and POPIA;

5.2.5 the assistance available from the Regulator in terms of PAIA and POPIA;

5.2.6 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 POPIA, including the manner of lodging an internal appeal, a complaint to the Regulator, and an application with a court against a decision;

5.2.7 the provisions of sections 14 and 51 of PAIA requiring a public body and a private body, respectively, to compile a manual, and how to obtain access to a manual;

5.2.8 the provisions of sections 15 and 52 of PAIA providing for the voluntary disclosure of categories of records by a public body and a private body, respectively;

5.2.9 the notices issued in terms of sections 22 and 54 of PAIA regarding fees to be paid in relation to requests for access; and

5.2.10 the regulations made in terms of section 92 of PAIA.

5.3 The Guide may be downloaded from the Regulator's website at www.inforegulator.org.za, inspected at the Regulator's offices during normal working hours, or requested from our Information Officer.

6. RECORDS AVAILABLE WITHOUT A REQUEST

6.1 The following records are automatically available, without a person having to request access in terms of PAIA:

6.1.1 our privacy policy, available on our website;

6.1.2 this manual, available on our website; and

6.1.3 general information about our services, available on our website or on request by email to privacy@orbitloyalty.co.za.

7. RECORDS AVAILABLE IN TERMS OF OTHER LEGISLATION

7.1 We keep records in accordance with the following legislation, among others, insofar as it applies to us from time to time:

7.1.1 Basic Conditions of Employment Act 75 of 1997;

7.1.2 Companies Act 71 of 2008;

7.1.3 Compensation for Occupational Injuries and Diseases Act 130 of 1993;

7.1.4 Consumer Protection Act 68 of 2008;

7.1.5 Electronic Communications and Transactions Act 25 of 2002;

7.1.6 Income Tax Act 58 of 1962;

7.1.7 Labour Relations Act 66 of 1995;

7.1.8 Promotion of Access to Information Act 2 of 2000;

7.1.9 Protection of Personal Information Act 4 of 2013;

7.1.10 Tax Administration Act 28 of 2011;

7.1.11 Unemployment Insurance Act 63 of 2001 and Unemployment Insurance Contributions Act 4 of 2002; and

7.1.12 Value-Added Tax Act 89 of 1991, from the effective date of our registration as a VAT vendor.

7.2 This list is not exhaustive. A record kept in terms of any of these laws is not automatically available, and a request for access to it remains subject to PAIA.

8. SUBJECTS ON WHICH WE HOLD RECORDS

8.1 We hold records on the following subjects, in the following categories:

8.1.1 Company and statutory records: memorandum of incorporation, registration documents, securities register, shareholders' agreement, directors' resolutions and minutes, and beneficial ownership records.

8.1.2 Finance and tax: annual financial statements, accounting records, management accounts and budgets, invoices, bank statements, and tax registrations and returns.

8.1.3 Clients: client agreements, quotations, change orders and supply orders, correspondence, billing and payment records, and site and pricing information.

8.1.4 Loyalty programme records held for clients: member, transaction and reward records processed on behalf of our clients as their operator (see clause 9).

8.1.5 Platform and technology: software, technical documentation, system and security logs, and backup records.

8.1.6 Suppliers and service providers: supplier agreements, quotations, invoices and correspondence.

8.1.7 Human resources: employment contracts, payroll and leave records, retirement fund records, and statutory employment and tax records.

8.1.8 Legal and compliance: data protection records, this manual, our privacy policy, and legal correspondence.

8.1.9 Communications: website content, general correspondence, contact form enquiries and call recordings.

9. RECORDS HELD ON BEHALF OF CLIENTS

9.1 Records relating to a client's loyalty programme, including the personal information of its members, are held by Orbit as that client's operator.

9.2 If you are a member of a client's loyalty programme and want access to your own information, the quickest route is to contact that client directly, as the responsible party for your information.

9.3 If we receive a request for a record relating to a client or its loyalty programme, we will notify and consult that client as a third party where PAIA requires it, before deciding the request.

10. HOW TO REQUEST ACCESS TO A RECORD

10.1 A request for access to a record must be made on Form 2 (Request for Access to Record) prescribed under regulation 7 of the Regulations Relating to the Promotion of Access to Information, 2021. The form is available on the Regulator's website or from our Information Officer, and must be submitted to our Information Officer by email to privacy@orbitloyalty.co.za or by post or hand delivery to our registered office.

10.2 The requester must provide enough detail to enable us to identify the record and the requester, state the form of access required, and identify the right the requester is seeking to exercise or protect, with an explanation of why the record is required for that purpose, as required by section 53 of PAIA.

10.3 A person making a request on behalf of another person must submit proof of the capacity in which the request is made.

10.4 We will decide a request within 30 days of receiving it and notify the requester of our decision. We may extend this period once, by up to 30 days, in the circumstances permitted by section 57 of PAIA, and will notify the requester if we do so. A request not decided within the applicable period is regarded as refused.

10.5 PAIA does not apply to a record requested for the purpose of criminal or civil proceedings, after those proceedings have commenced, where the production of or access to that record is provided for in any other law.

11. FEES

11.1 A requester, other than a personal requester seeking access to a record containing their own personal information, must pay the prescribed request fee before we process the request. If access is granted, an access fee is payable for the search, reproduction and preparation of the record. Where the search and preparation are expected to exceed six hours, we may require a deposit of one third of the access fee. Access will not be given until all applicable fees have been paid.

11.2 The fees currently prescribed for private bodies, as published by the Regulator, are:

11.2.1 request fee: R140.00;

11.2.2 photocopy or printed copy of an A4-size page: R2.00 per page or part of a page;

11.2.3 copy in a computer-readable form on a flash drive or compact disc provided by the requester: R40.00, or on a compact disc provided by us: R60.00;

11.2.4 transcription of an audio record, per A4-size page: R24.00;

11.2.5 copy of an audio record on a flash drive or compact disc provided by the requester: R40.00, or on a compact disc provided by us: R60.00;

11.2.6 transcription or copy of visual images: the cost charged by the service provider;

11.2.7 search and preparation of a record, for each hour or part of an hour after the first hour: R145.00, up to a maximum of R435.00; and

11.2.8 postage, email or other electronic transfer: the actual cost.

11.3 If the Regulator publishes an updated fee schedule, the schedule current at the time of the request applies.

12. GROUNDS FOR REFUSAL OF ACCESS

12.1 We may, and in certain cases must, refuse access to a record on the grounds set out in Chapter 4 of Part 3 of PAIA, which include the protection of:

12.1.1 the privacy of a third party who is a natural person;

12.1.2 commercial information of a third party;

12.1.3 confidential information of a third party;

12.1.4 the safety of individuals and the protection of property;

12.1.5 records privileged from production in legal proceedings;

12.1.6 our own commercial information, including trade secrets and financial, commercial, scientific or technical information whose disclosure would be likely to cause harm to our commercial or financial interests; and

12.1.7 research information.

12.2 We must nevertheless grant access to a record where section 70 of PAIA requires disclosure in the public interest. If we refuse a request, we will give adequate reasons for the refusal.

13. REMEDIES

13.1 PAIA does not provide for an internal appeal against a decision of a private body. A requester or third party who is dissatisfied with our decision may lodge a complaint with the Regulator, in the prescribed form, within 180 days of the decision. An application to court may be made only after the complaint procedure before the Regulator has been exhausted.

Information Regulator (South Africa)
Woodmead North Office Park, 54 Maxwell Drive, Woodmead, Johannesburg, 2191
PAIA complaints: PAIAComplaints@inforegulator.org.za
General enquiries: enquiries@inforegulator.org.za | 010 023 5200
www.inforegulator.org.za

14. PROCESSING OF PERSONAL INFORMATION

14.1 Purpose of processing. We process personal information to:

14.1.1 respond to enquiries, and prepare, conclude and perform agreements with our clients and suppliers;

14.1.2 manage our client relationships, including calculating, reviewing, invoicing and collecting our fees;

14.1.3 provide, support and secure our platform;

14.1.4 process loyalty programme information on our clients' documented instructions, as their operator;

14.1.5 employ and administer our staff;

14.1.6 prevent, investigate and respond to fraud, security incidents and other unlawful activities; and

14.1.7 comply with legal and regulatory requirements, for audit purposes and for legal proceedings.

14.2 Categories of data subjects and personal information. We process the following categories of personal information:

14.2.1 Clients and prospective clients, including the organisations and their contact persons: names, job titles, contact details, registration details, billing, banking and debit order details, site turnover figures and correspondence.

14.2.2 Authorised users of our platform: names, contact details, login credentials, and activity and audit records.

14.2.3 Members of our clients' loyalty programmes, processed as operator: names and contact details, loyalty account and card identifiers, account status, transaction, reward and redemption records, preferences supplied by the client, and support communications.

14.2.4 Suppliers and service providers: names, registration details, contact details, banking details and tax information.

14.2.5 Employees and directors: names, identity numbers, contact details, banking details, tax numbers, remuneration and payroll information, retirement fund information and employment records.

14.2.6 Website visitors and callers: details submitted through our contact form, website server log information such as IP address, browser type and pages requested, and call recordings.

14.3 Recipients of personal information. Depending on the purpose, we may supply personal information to:

14.3.1 the client on whose behalf loyalty programme information is processed;

14.3.2 service providers acting on our behalf, including cloud hosting (Amazon Web Services), communication delivery (SMS, WhatsApp and email), telephony, accounting and payroll providers;

14.3.3 banks, for payments and debit order collections;

14.3.4 the South African Revenue Service and other government bodies, for tax and statutory employment purposes;

14.3.5 retirement fund administrators, for employee contributions;

14.3.6 auditors, attorneys, debt collectors and other professional advisors;

14.3.7 regulators, courts and law enforcement agencies, where required by law; and

14.3.8 any successor to our business.

14.4 Planned transborder flows. Platform information, including loyalty programme information processed for our clients, is processed primarily in Amazon Web Services Africa (Cape Town), with encrypted disaster-recovery backups held in Amazon Web Services Europe (Ireland). That transfer relies on section 72(1)(a) of POPIA and binding contractual terms with Amazon Web Services that require an adequate level of protection. Some of the service providers we use to run our own business may also store information outside the Republic. Any transfer outside the Republic takes place only in accordance with section 72 of POPIA.

14.5 Information security measures. We maintain appropriate, reasonable technical and organisational measures to protect the confidentiality, integrity and availability of personal information, including:

14.5.1 documented information security governance, risk assessment and periodic review;

14.5.2 role-based access controls, least-privilege administration and multi-factor authentication for privileged access;

14.5.3 encryption in transit and at rest;

14.5.4 secure management of credentials, keys and secrets;

14.5.5 logging and monitoring of material administrative, access and security events;

14.5.6 malware protection, patching and vulnerability management;

14.5.7 secure development, change control and controlled deployment;

14.5.8 backup, recovery and disaster-recovery measures;

14.5.9 staff confidentiality obligations, security awareness and prompt revocation of access;

14.5.10 incident identification, containment, investigation, remediation and notification procedures; and

14.5.11 due diligence on, and written contractual safeguards with, service providers that process personal information for us.

15. AVAILABILITY OF THIS MANUAL

15.1 This manual is available:

15.1.1 on our website at www.orbitloyalty.co.za;

15.1.2 at our principal place of business, for public inspection during normal business hours;

15.1.3 to any person on request, on payment of the prescribed fee for a copy; and

15.1.4 to the Regulator on request.

16. UPDATING OF THIS MANUAL

16.1 Our Information Officer will update this manual regularly, and whenever there is a material change to the information it contains.

Issued by: Niehaus Loots, Information Officer, for and on behalf of Orbit Loyalty (Pty) Ltd
Date: 22 October 2026