



PREPARED IN TERMS OF SECTION 51 OF THE PROMOTION OF ACCESS TO INFORMATION ACT, 2 OF 2000

Entity: Swordfish Software (Pty) Ltd

Registration Number: 2014/157620/07

Date of Last Review: June 2026

Version: 1.0

INTRODUCTION

This Manual is prepared in accordance with section 51 of the Promotion of Access to Information Act, 2 of 2000, as amended ("PAIA"), and includes relevant information required under the Protection of Personal Information Act, 4 of 2013 ("POPIA").

The purpose of this Manual is to assist members of the public, clients, data subjects, regulators and other stakeholders in understanding how to request access to records held by Swordfish Software (Pty) Ltd ("Swordfish"), and to explain how Swordfish processes personal information.

Swordfish is a South African software-as-a-service provider offering software, support, integrations and related services to clients in the debt collection, recoveries and related industries.

DEFINITIONS

In this Manual:

"Data Subject" means the person to whom personal information relates.

"Information Officer" means the person responsible for ensuring compliance with PAIA and POPIA.

"Manual" means this PAIA Manual.

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

"Personal Information" has the meaning given to it in POPIA.

"POPIA" means the Protection of Personal Information Act, 4 of 2013.

"Processing" has the meaning given to it in POPIA.

"Record" means any recorded information held by Swordfish, regardless of form or medium.

"Requester" means any person requesting access to a record under PAIA.

KEY CONTACT DETAILS

INFORMATION OFFICER / HEAD OF PRIVATE BODY

Name: Juan Swanepoel

Position: Chief Information Officer

Email: complyorcry@swordfish.co.za

Telephone: 0126769993

DEPUTY INFORMATION OFFICER

Name: Carice Viljoen

Position: Compliance and Information Security Specialist

Email: complyorcry@swordfish.co.za

Telephone: 0126769993

GENERAL PAIA / POPIA CONTACT

Email: complyorcry@swordfish.co.za

Website: <https://www.swordfish.co.za>

Physical Address: Colab Office Space, 194 Bancor Ave, Waterkloof Glen, Pretoria, 0181

Postal Address: Lombardy, Unit 67, Lombardy Business Park, Shere, 0084

GUIDE ON HOW TO USE PAIA

The Information Regulator has, in terms of section 10(1) of PAIA, updated and made available the official Guide on how to use PAIA. The Guide is intended to assist persons who wish to exercise any right under PAIA or POPIA.

The Guide includes information on:

- the purpose of PAIA and POPIA;
- how to request access to records;
- the assistance available from Information Officers;
- the assistance available from the Information Regulator;
- remedies available where a request is refused;
- fees payable for access requests; and
- applicable PAIA regulations.

The Information Regulator's template states that the Guide is available in each official language and in braille.

The Guide may be obtained from the Information Regulator:

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

Email: enquiries@inforegulator.org.za

RECORDS AUTOMATICALLY AVAILABLE

Certain information may be available without a formal PAIA request, including:

- information published on Swordfish's website;
- marketing and product information;
- publicly available company information;
- published legal documents, including applicable standard terms;
- published privacy notices;
- published PAIA Manual; and
- other documents made publicly available by Swordfish from time to time.

Access to these records may be obtained directly from Swordfish's website or by contacting Swordfish.

RECORDS HELD BY SWORDFISH

Swordfish may hold records in the following categories:

CORPORATE AND GOVERNANCE RECORDS

- company registration documents;
- shareholding and statutory records;
- board and shareholder resolutions;
- governance documents;
- policies and procedures;
- regulatory correspondence;
- insurance records;
- audit and compliance records.

FINANCIAL RECORDS

- accounting records;
- invoices and statements;
- tax records;
- banking records;
- payment records;
- procurement records;
- supplier invoices and purchase orders.

HUMAN RESOURCES RECORDS

- employee and contractor records;
- recruitment records;
- contracts of employment;
- disciplinary and grievance records;
- training and awareness records;
- leave and attendance records;
- performance review records;
- payroll-related records.

CLIENT AND CONTRACT RECORDS

- client contracts and sales orders;
- master subscription agreements;
- data processing agreements;
- service level agreements;
- statements of work;
- onboarding records;
- client support records;
- correspondence with clients;

- project records;
- service and implementation records.

PRODUCT, TECHNICAL AND OPERATIONAL RECORDS

- system documentation;
- software development records;
- technical specifications;
- access control records;
- change management records;
- incident records;
- support tickets;
- integration documentation;
- system logs, where applicable;
- backup and disaster recovery records.

INFORMATION SECURITY AND COMPLIANCE RECORDS

- ISO/IEC 27001-related records;
- risk assessments;
- internal audit records;
- supplier due diligence records;
- security policies and procedures;
- vulnerability and penetration test records;
- access review records;
- security incident records;
- awareness and training evidence;
- business continuity and disaster recovery evidence.

SUPPLIER AND THIRD-PARTY RECORDS

- supplier contracts;
- supplier due diligence records;
- supplier security assessments;
- integration partner records;
- procurement records;
- subcontractor records;
- service provider correspondence.

LEGAL RECORDS

- legal opinions;
- contractual negotiation records;
- dispute records;
- regulatory records;
- correspondence with legal advisors;
- notices and claims.

RECORDS AVAILABLE IN TERMS OF OTHER LEGISLATION

Swordfish may hold records required under legislation including, but not limited to:

- Companies Act, 71 of 2008;
- Promotion of Access to Information Act, 2 of 2000;
- Protection of Personal Information Act, 4 of 2013;
- Electronic Communications and Transactions Act, 25 of 2002;
- Basic Conditions of Employment Act, 75 of 1997;
- Labour Relations Act, 66 of 1995;
- Employment Equity Act, 55 of 1998;
- Income Tax Act, 58 of 1962;
- Value-Added Tax Act, 89 of 1991;
- Occupational Health and Safety Act, 85 of 1993;
- National Credit Act, 34 of 2005, where applicable to client operations or related services;
- Prescription Act, 68 of 1969, where applicable to system functionality or client processes.

This list is not exhaustive and may be updated from time to time.

HOW TO REQUEST ACCESS TO RECORDS

A requester who wishes to request access to a record held by Swordfish must complete the prescribed PAIA request form and submit it to the Information Officer or Deputy Information Officer.

Requests must:

- be made in the prescribed form;
- provide sufficient detail to identify the requested record;
- identify the right the requester seeks to exercise or protect;
- explain why the record is required for the exercise or protection of that right;
- provide the requester's contact details; and
- comply with the procedural requirements of PAIA.

For a private body, access must be given where the record is required for the exercise or protection of rights, the procedural requirements are met, and access is not refused under PAIA. The Regulator's template references this requirement under section 50(1) of PAIA.

Requests may be submitted to:

Email: complyorcry@swordfish.co.za

Attention: Information Officer / Deputy Information Officer

FEES

A requester may be required to pay the prescribed PAIA request fee and access fees, where applicable.

Swordfish may require payment before processing a request or before providing access to a record, as permitted under PAIA and the applicable regulations.

If fees are payable, Swordfish will notify the requester of the amount and payment method.

GROUNDINGS FOR REFUSAL OF ACCESS

Swordfish may refuse access to a record where PAIA permits or requires refusal. Grounds for refusal may include:

- protection of another person's privacy;
- protection of commercial information of Swordfish or a third party;
- protection of confidential information;
- protection of safety or property;
- privileged legal records;
- protection of research information;
- protection of records relating to legal proceedings;
- records that cannot be found or do not exist;
- requests that are frivolous, vexatious, or involve an unreasonable diversion of resources.

Each request will be assessed on its facts and in accordance with PAIA.

REMEDIES AVAILABLE TO REQUESTERS

If a requester is dissatisfied with Swordfish's decision, the requester may:

- request written reasons for the decision, where applicable;
- lodge a complaint with the Information Regulator; or
- approach a court with jurisdiction for appropriate relief.

There is generally no internal appeal process for private bodies under PAIA.

PROCESSING OF PERSONAL INFORMATION UNDER POPIA

Swordfish processes personal information for lawful business, operational, contractual, security and compliance purposes.

PURPOSE OF PROCESSING

Swordfish may process personal information for purposes including:

- providing software and related services to clients;
- client onboarding and contract management;

- account administration and billing;
- service delivery and support;
- system access management;
- integrations and technical support;
- supplier and partner management;
- recruitment and employment administration;
- compliance with legal and regulatory obligations;
- information security monitoring and incident management;
- audit, risk and governance purposes;
- communication with clients, suppliers and stakeholders;
- enforcing contractual rights and obligations;
- business continuity and disaster recovery.

CATEGORIES OF DATA SUBJECTS

Swordfish may process personal information relating to:

- clients and prospective clients;
- client representatives and authorised users;
- debtors or consumers whose information is processed through client systems, where applicable;
- employees;
- job applicants;
- contractors and consultants;
- suppliers and service providers;
- directors and shareholders;
- visitors to Swordfish systems, websites or premises;
- regulators, auditors and professional advisors.

CATEGORIES OF PERSONAL INFORMATION

Swordfish may process the following categories of personal information:

- names and surnames;
- contact details;
- identity numbers or registration numbers, where applicable;
- employment information;
- user access credentials and role information;
- system usage information;
- correspondence and support ticket information;
- billing and payment information;
- contractual information;
- technical identifiers, including IP addresses and logs;
- security event information;
- client-provided debtor or consumer information, where applicable to services;
- any other information required for lawful operational, contractual or compliance purposes.

RECIPIENTS OR CATEGORIES OF RECIPIENTS

Personal information may be shared with:

- authorised Swordfish employees and contractors;
- clients, where required for service delivery;
- hosting and infrastructure providers;
- software and support service providers;
- integration partners, where applicable;
- professional advisors;
- auditors;
- regulators and public bodies, where legally required;
- law enforcement or courts, where required by law;
- third-party service providers operating under appropriate contractual obligations.

CROSS-BORDER TRANSFERS

Swordfish may transfer or store personal information outside South Africa where required for service delivery, hosting, support, software tools, cloud services, or integration services.

Where cross-border transfers occur, Swordfish will take reasonable steps to ensure that appropriate contractual, legal and security safeguards are in place as required by POPIA.

SECURITY MEASURES

Swordfish applies reasonable and appropriate technical and organisational measures to protect personal information against loss, unauthorised access, misuse, disclosure, alteration or destruction.

These measures may include:

- access control and user authentication;
- role-based access management;
- password and multi-factor authentication controls, where applicable;
- logging and monitoring;
- information security policies;
- supplier due diligence;
- contractual confidentiality obligations;
- secure development and change management controls;
- backup and disaster recovery measures;
- vulnerability management;
- incident management procedures;
- staff awareness and training;
- ISO/IEC 27001-aligned information security controls.

AVAILABILITY OF THIS MANUAL

This Manual is available:

- on Swordfish's website;
- on request from the Information Officer or Deputy Information Officer; and
- at Swordfish's principal place of business, where applicable and by prior arrangement.

Swordfish may update this Manual from time to time.

14. REVIEW OF THIS MANUAL

This Manual will be reviewed periodically and updated where necessary to reflect changes to Swordfish's operations, legal obligations, processing activities or contact details.

Approved by: Juan Swanepoel - CIO

Date approved: June 2026

Next review date: March 2027