Promotion of Access to Information ("PAIA") Manual

TRADI (PTY) LTD

Prepared in terms of section 51 of the Promotion of Access to Information Act 2 of 2000 (as amended), following the Information Regulator's template for a private body.

Date of compilation: 13 October 2026

1. List of acronyms and abbreviations

Term	Meaning
"CEO"	Chief Executive Officer
"DIO"	Deputy Information Officer
"IO"	Information Officer
"Minister"	Minister of Justice and Correctional Services
"PAIA"	Promotion of Access to Information Act 2 of 2000 (as amended)
"POPIA"	Protection of Personal Information Act 4 of 2013
"Regulator"	Information Regulator
"Republic"	Republic of South Africa
"Tradi"	TRADI (PTY) LTD, registration number 2026/580212/07, trading as Tradi

2. Purpose of PAIA manual

This PAIA Manual is useful for the public to:

1. check the categories of records held by a body which are available without a person having to submit a formal PAIA request;
2. have a sufficient understanding of how to make a request for access to a record of the body, by providing a description of the subjects on which the body holds records and the categories of records held on each subject;
3. know the description of the records of the body which are available in accordance with any other legislation;
4. access all the relevant contact details of the Information Officer and Deputy Information Officer who will assist the public with the records they intend to access;
5. know the description of the guide on how to use PAIA, as updated by the Regulator, and how to obtain access to it;

6. know if the body will process personal information, the purpose of processing of personal information and the description of the categories of data subjects and of the information or categories of information relating thereto;
7. know the description of the categories of data subjects and of the information or categories of information relating thereto;
8. know the recipients or categories of recipients to whom the personal information may be supplied;
9. know if the body 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; and
10. know whether the body has appropriate security measures to ensure the confidentiality, integrity and availability of the personal information which is to be processed.

3. Key contact details for access to information of Tradi

3.1 Information Officer

Tradi is a private body. Its head is its Information Officer, as PAIA and section 55 of POPIA provide.

Field	Detail
Name	Alison Harber, Director
Tel	+27 72 455 9164
Email	hello@tradi.co.za (put "PAIA" in the subject line)

3.2 Deputy Information Officer

Matthew Travis Walton was designated under section 17(1) of PAIA and section 56 of POPIA, with effect from 22 July 2026.

Field	Detail
Name	Matthew Travis Walton
Tel	+27 72 455 9164
Email	hello@tradi.co.za (put "PAIA" in the subject line)

3.3 Access to information general contacts

Field	Detail
Email	hello@tradi.co.za (put "PAIA" in the subject line)

3.4 National or Head Office

Field	Detail
Postal address	32 Draper Street, Newlands, Cape Town, Western Cape, 7708
Physical address	Same as postal address
Telephone	+27 72 455 9164
Email	hello@tradi.co.za
Website	https://tradi.co.za

4. Guide on how to use PAIA and how to obtain access to the guide

4.1 The Regulator has, in terms of section 10(1) of PAIA, as amended, updated and made available the revised 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.

4.2 The Guide is available in each of the official languages and in braille.

4.3 The aforesaid Guide contains the description of:

1. the objects of PAIA and POPIA;
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 every Deputy Information Officer of every public and private body designated in terms of section 17(1) of PAIA and section 56 of POPIA;
3. the manner and form of a request for access to a record of a public body contemplated in section 11, and access to a record of a private body contemplated in section 50;
4. the assistance available from the IO of a public body in terms of PAIA and POPIA;
5. the assistance available from the Regulator in terms of PAIA and POPIA;
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 by the information officer 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;
7. the provisions of sections 14 and 51 requiring a public body and private body, respectively, to compile a manual, and how to obtain access to a manual;
8. the provisions of sections 15 and 52 providing for the voluntary disclosure of categories of records by a public body and private body, respectively;
9. the notices issued in terms of sections 22 and 54 regarding fees to be paid in relation to requests for access; and
10. the regulations made in terms of section 92.

4.4 Members of the public can inspect or make copies of the Guide from the offices of the public and private bodies, including the office of the Regulator, during normal working hours.

4.5 The Guide can also be obtained upon request to the Information Officer, or from the website of the Regulator (https://inforegulator.org.za).

4.6 A copy of the Guide is also available in the following official language, for public inspection during normal office hours: English.

4.7 The Regulator's contact details, as published at the date of compilation (confirm current details at https://inforegulator.org.za):

Field	Detail
Physical address	JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001
Postal address	P.O. Box 31533, Braamfontein, Johannesburg, 2017
Telephone	+27 10 023 5200
General enquiries	enquiries@inforegulator.org.za
PAIA complaints	PAIAComplaints@inforegulator.org.za
POPIA complaints	POPIAComplaints@inforegulator.org.za
Website	https://inforegulator.org.za

5. Categories of records of Tradi which are available without a person having to request access

The following records are published on Tradi's website and may be read or downloaded by anyone without a PAIA request.

Category of records	Types of the record	Available on website	Available upon request
Legal and policy documents	Terms of service, privacy policy, cancellation and refund policy, pricing	X (tradi.co.za)	X
Access to information	This PAIA manual	X (tradi.co.za)	X
Company disclosure	Legal name, registration number, registered office and contact details published under section 43 of the Electronic Communications and Transactions Act 25 of 2002	X (tradi.co.za)	X
Marketing and communications	Public website content, launch announcements	X (tradi.co.za)	X

6. Description of the records which are available in accordance with any other legislation

Records created and held in accordance with South African legislation include the following. Access to these records is governed by the legislation named and, where applicable, by PAIA.

Category of records	Applicable legislation
Memorandum of incorporation, registers of directors and securities, company records and minutes	Companies Act 71 of 2008
Annual financial statements, accounting records, tax returns and assessments	Companies Act 71 of 2008; Income Tax Act 58 of 1962; Tax Administration Act 28 of 2011; Value-Added Tax Act 89 of 1991 (once registered)
Supplier and customer records, consumer agreements, transaction records	Consumer Protection Act 68 of 2008; Electronic Communications and Transactions Act 25 of 2002
PAIA manual, records of requests for access	Promotion of Access to Information Act 2 of 2000
Personal information records, records of processing, data subject requests, security compromise notifications	Protection of Personal Information Act 4 of 2013
Employment records (none held at the date of compilation)	Basic Conditions of Employment Act 75 of 1997; Labour Relations Act 66 of 1995; Unemployment Insurance Act 63 of 2001; Skills Development Act 97 of 1998

7. Description of the subjects on which Tradi holds records and categories of records held on each subject

Tradi is an online marketplace, in development at the date of compilation, that will connect customers with verified tradespeople in South Africa. At the date of compilation the website is a pre-launch site: visitors can join a launch list with an email address, and running the site also generates server logs, email-delivery records, and an anti-spam check on the home page. The server logs and the anti-spam check see IP addresses and technical browser signals; the email-delivery records relate to the launch-list address itself. The table describes the subjects on which Tradi holds records now, and the categories it will hold once the marketplace opens; where a category does not yet exist, it is marked.

Subjects on which the body holds records	Categories of records
Company and statutory	Incorporation documents, registers, resolutions, tax registrations, banking mandates
Finance	Bank statements, invoices, payment provider settlement reports, commission records, tax records
Website visitors and launch list	Launch-list email addresses and subscription status, server and email delivery logs, anti-spam check results
Customers (once the marketplace opens)	Account details, job requests and booking history, the address where work is done, messages with tradespeople, payment confirmations, refund bank details where needed, reviews and ratings, support correspondence
Tradespeople (once the marketplace opens)	Account and business details, verification material (identity documents, trade qualifications, registrations, insurance), bank details for payouts, bookings, payouts, reviews, replies
Operators and suppliers	Contracts and data-processing terms with hosting, email, anti-spam, payment and analytics providers; supplier invoices
Legal and compliance	Policies, this manual, correspondence with regulators, complaints and their outcomes, records of access requests and data subject requests
Technology	Source code, infrastructure configuration, audit and access logs, incident records
Personnel (none at the date of compilation)	Employment contracts, payroll and statutory returns, when there are employees

8. Processing of personal information

8.1 Purpose of processing personal information

Tradi processes personal information in order to:

1. operate the launch list: send launch updates to people who have asked for them, and let them unsubscribe;
2. run and secure the website: keep it working, prevent abuse of its forms, and investigate security incidents;
3. when the marketplace opens, operate it: create and manage accounts, let customers request quotes and book tradespeople, pass a booking's details to the other party to it, take payment through a payment provider and pay tradespeople out, and host reviews;
4. verify tradespeople before they can take bookings, including identity, trade qualifications, registrations and insurance;
5. provide customer support and handle complaints and disputes;

6. meet legal obligations, including tax and company record-keeping, consumer protection, and responding to lawful requests from regulators, courts and law enforcement; and
7. with consent, measure how the website and service are used in order to improve them.

Tradi does not sell personal information and does not share it for anyone else's marketing.

8.2 Description of the categories of data subjects and of the information or categories of information relating thereto

Categories of data subjects	Personal information that may be processed
Website visitors	IP address and technical browser signals in server logs and in the anti-spam check on the home page
Launch-list subscribers	Email address, subscription and unsubscription status, email delivery records
Customers (once the marketplace opens)	Name, email address, phone number; the address where work is to be done; job descriptions and messages with tradespeople; booking and payment history (not card details, which the payment provider holds); bank account details only for a refund the original payment method cannot receive; reviews; support correspondence
Tradespeople (once the marketplace opens)	Name, email address, phone number, business name and registration details, trade and service area, profile photograph; identity documents, trade qualifications, registrations and insurance for verification; bank details for payouts; bookings, payouts and earnings; reviews and replies
Suppliers, operators and their contact persons	Business contact details, contract and billing records
Directors and, when there are any, employees	Identity and contact details, statutory and payroll records

Identity documents and bank details are treated as sensitive: they are collected only for verification, payouts and refunds the original payment method cannot receive, held in a private store with time-limited access, never published, and never written to logs, analytics or error reports.

8.3 The recipients or categories of recipients to whom the personal information may be supplied

Category of personal information	Recipients or categories of recipients to whom the personal information may be supplied
All records held by Tradi's systems	Amazon Web Services (hosting, storage, backups and logs), acting as an operator on Tradi's instructions
IP address and browser signals from the home page	Cloudflare (Turnstile anti-spam check), acting as an operator
Email address (and, once accounts exist, name) and the content of emails Tradi sends	Resend (email delivery and launch-list management), acting as an operator
Payment details and the name of the payer and payee (once bookings open)	Paystack (planned payment provider, subject to activation of Tradi's account). Confirm the account-specific data flow and operator terms before bookings open; Tradi will not store card details
Pseudonymous usage data, only after consent (once analytics ship)	PostHog (product analytics), acting as an operator
Customer name, phone number, job address and job description	The tradesperson a customer requests a quote from or books, so that they can do the work
Tradesperson name, business name, photograph, trade, service area, verification status, rating and reviews	Customers and the public, on the tradesperson's profile once the marketplace opens
Identity, qualification and registration details of tradespeople	The issuing bodies and registers used to confirm them (for example the South African Qualifications Authority and trade registration bodies), where verification requires it
Any record	Tradi's professional advisers (lawyers, accountants, auditors) under a duty of confidentiality; regulators, courts, law enforcement and other public bodies where the law requires or permits disclosure; a purchaser or successor of Tradi's business, under confidentiality

8.4 Planned transborder flows of personal information

Tradi's own infrastructure runs in the Amazon Web Services Cape Town region, so the records Tradi stores stay in the Republic. Some operators process outside the Republic; section 72 of POPIA is relied on for each transfer. The transfers already happening, to Amazon Web Services, Cloudflare and Resend, are disclosed in the privacy policy at https://tradi.co.za/privacy; the planned transfers below, to PostHog and Paystack, will be disclosed there before they begin.

Category of personal information	Country or region	Recipient	Purpose
IP address and technical browser signals	United States of America and Cloudflare's global network	Cloudflare, Inc.	Anti-spam check on the home page
Email address (and, once accounts exist, name) and the content of emails Tradi sends	United States of America	Resend, Inc.	Email delivery and launch-list management
Request metadata (IP address, requested page) for website delivery	Amazon Web Services' global content delivery network	Amazon Web Services	Delivering the website quickly and protecting it from abuse. Stored records remain in the Cape Town region
Pseudonymous usage data, after consent (planned)	European Union (Germany)	PostHog, Inc.	Product analytics, once analytics ship
Payer and payee details for a payment (planned)	Paystack processing locations and any cross-border transfers must be confirmed before activation	Paystack (planned, subject to activation; operator terms to be filed)	Payment processing and payouts, once bookings open

Before receiving personal information, each operator must be bound by a written data-processing agreement or published data-processing terms that require it to protect the information and to process it only on Tradi's instructions. Paystack's data-processing terms and processing locations remain to be confirmed before payment activation.

8.5 General description of information security measures to be implemented by the responsible party to ensure the confidentiality, integrity and availability of the information

The following measures are in place or under implementation ahead of the marketplace opening:

1. Encryption of personal information in transit (TLS) and at rest, using managed cloud key management.
2. Databases and file stores on private networks with no public endpoint; access only from Tradi's application and from authenticated administrators.
3. Access limited to the people who need it, protected by multi-factor authentication, with short-lived credentials for automated deployments and no shared or long-lived keys in code.
4. Identity documents and bank details kept in a private store, served only through time-limited access links, with every access logged.

5. Audit logging of administrative actions on the infrastructure, and automated alerting on unusual activity and spend.
6. Data minimisation: collecting only what a purpose needs, and stated retention periods after which information is deleted.
7. Secure development practice: peer review of every change, automated testing, dependency vulnerability monitoring, and no credentials or unnecessary personal information in source code, logs, analytics or error reports.
8. Written operator agreements with every third party that processes personal information on Tradi's behalf.
9. A documented security compromise response procedure, under which Tradi notifies the Regulator and affected data subjects as section 22 of POPIA requires.
10. Encrypted, access-controlled backups, retained for a defined period and covered by the same access controls as live data.

9. How to request access to a record of Tradi

9.1 A request for access to a record of Tradi must be made on Form 2 of the Regulations Relating to the Promotion of Access to Information, 2021 ("Form 2"), available from the Regulator's website, and sent to the Information Officer by email to hello@tradi.co.za with "PAIA" in the subject line, or by post or hand to the address in section 3.4.

9.2 The requester must give enough particulars to identify the record, state which right they are exercising or protecting and why the record is required for it (section 50(1)(a) of PAIA), say in which form they want access, give an address or email address for the reply, and provide proof of identity. A person requesting on behalf of someone else must provide proof of their authority to do so.

9.3 **Fees.** Section 54 of PAIA and Annexure B to the Regulations prescribe the fees. At the date of compilation they are: a request fee of R140.00, payable before the request is processed, except by a personal requester (a person requesting a record about themselves); an access fee of R2.00 per A4 page copied or printed; R40.00 for a copy on a flash drive or compact disc supplied by the requester; and, where searching for and preparing the record takes more than one hour, R145.00 for each hour or part of an hour after the first. Postage is charged at cost. If the Regulations change, the Regulations apply. A data subject asking for confirmation of whether Tradi holds personal information about them, or for a description of it, in terms of section 23 of POPIA, pays no request fee.

9.4 **Timing.** The Information Officer will decide on the request and notify the requester within 30 days of receiving it, or of receiving the request fee where one is payable (section 56 of PAIA). That period may be extended once, by up to 30 days, where section 57 of PAIA allows it, and the requester will be told of the extension and the reason for it.

9.5 **Grounds for refusal.** Access will be refused where Chapter 4 of Part 3 of PAIA requires or permits it, including where a record would unreasonably disclose the personal information of a third party, would disclose commercial or confidential information of a third party, is privileged from production in legal proceedings, or would endanger the life or safety of a person. Where a record is refused in part, access will be given to the rest.

9.6 **Remedies.** A requester who is dissatisfied with a decision of the Information Officer may lodge a complaint with the Regulator within 180 days of the decision (section 77A of PAIA), using the complaint form on the Regulator's website, and may apply to a court in terms of section 78 of PAIA.

10. Availability of the manual

10.1 A copy of the Manual is available:

1. on Tradi's website, at https://tradi.co.za/legal/tradi-paia-manual.pdf, linked from the privacy policy at https://tradi.co.za/privacy;
2. to any person upon request to the Information Officer, by email at no charge, or in printed form upon the payment of a reasonable prescribed fee;
3. at Tradi's registered office in section 3.4, for inspection during normal office hours, by arrangement with the Information Officer; and
4. to the Information Regulator upon request.

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

11. Updating of the manual

The Information Officer will update this Manual whenever Tradi's records, operators, cross-border flows or contact details change, and will review it at least once a year. The date of compilation on the first page shows when it was last changed.

Issued by the Information Officer of TRADI (PTY) LTD on 7 September 2026.