Manual in terms of section 51 of the Promotion of Access to Information Act, 2000

Published by Keychat Solutions (Pty) Ltd in terms of section 51 of the Promotion of Access to Information Act, 2 of 2000 ("PAIA"), read with the Protection of Personal Information Act, 4 of 2013 ("POPIA") and the Regulations of 2021.

Legal name	Keychat Solutions (Pty) Ltd	Registration number	2025/898497/07
Trading as	Keychat	Type of body	Private body
Website	keychat.co.za	Country	Republic of South Africa
Effective date	3 August 2026	Version	1.0

1 Purpose of this manual

PAIA gives effect to the constitutional right of access to information. This manual tells you what records Keychat Solutions (Pty) Ltd ("Keychat", "we", "us") holds, and how to request access to them.

It is published in terms of section 51 of PAIA. Section 51(1) requires every private body to compile a manual describing the body, the records it holds, and the procedure for requesting access. This manual also contains the additional particulars required by the PAIA Regulations of 2021, which oblige a private body to describe how it processes personal information under POPIA.

This manual is available free of charge. Details of where to obtain it appear in section 13.

2 About Keychat

Keychat is a managed WhatsApp commerce platform. We enable South African food, retail, and service businesses to take orders, manage reservations, sell event tickets, run loyalty programmes, schedule deliveries, and provide customer support through WhatsApp.

Our clients are merchants. Their customers transact with them over a WhatsApp channel that we operate on the merchant's behalf. This distinction matters throughout this manual: for our own business records we are the responsible party, and for a merchant's customer records we act as an operator in terms of sections 20 and 21 of POPIA, processing only on that merchant's instruction.

3 Contact details

In terms of section 51(1)(a) of PAIA and section 56 of POPIA, the following person is the Information Officer and the head of the private body. All requests, enquiries, and objections under PAIA or POPIA must be directed to

them.

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INFORMATION OFFICER & HEAD OF THE PRIVATE BODY

Entity	Keychat Solutions (Pty) Ltd
Email	regardt@keychat.co.za
WhatsApp	+27 69 027 7170
Website	keychat.co.za
Street address	8 Sea Wheat, Atlantic Beach Estate, Melkbosstrand, Cape Town, 7441
Postal address	8 Sea Wheat, Atlantic Beach Estate, Melkbosstrand, Cape Town, 7441

4 The PAIA Guide issued by the Information Regulator

Section 10 of PAIA requires the Information Regulator to publish a guide, in each official language, explaining how to exercise rights under the Act. The guide covers the objects of PAIA, the contact details of information officers, the manner and form of a request, the assistance available, the remedies available, and the fees payable.

The guide is available from the Information Regulator:

- Website: inforegulator.org.za
- Email: enquiries.IR@justice.gov.za
- Email (PAIA-specific): PAIAComplaints.IR@justice.gov.za

5 Records available without a formal request

Keychat has not published a notice in terms of section 52(2) of PAIA listing categories of records that are automatically available without a request.

The following information is nonetheless freely available on our website and requires no PAIA request:

- Product, service, and pricing information published at keychat.co.za.
- Our Privacy Policy, published at keychat.co.za/privacy.
- This manual.
- Support guides and published documentation.

6 Records held in terms of other legislation

In terms of section 51(1)(d) of PAIA, Keychat holds records in accordance with the following legislation. Listing an Act here does not mean the records are available on request — it records the legal basis on which they are kept.

LEGISLATION	NATURE OF RECORDS HELD
Companies Act, 71 of 2008	Constitutional documents, registers of directors and shareholders, statutory returns, minutes and resolutions
Income Tax Act, 58 of 1962	Tax returns, assessments, employee tax records, supporting schedules

LEGISLATION	NATURE OF RECORDS HELD
Tax Administration Act, 28 of 2011	Records retained for the prescribed five-year period
Value-Added Tax Act, 89 of 1991	VAT registration, returns, tax invoices, input and output records
Basic Conditions of Employment Act, 75 of 1997	Employment contracts, hours, leave and remuneration records
Labour Relations Act, 66 of 1995	Disciplinary records, grievance records, workplace policies
Unemployment Insurance Act, 63 of 2001	UIF contributions and declarations
Compensation for Occupational Injuries and Diseases Act, 130 of 1993	Injury and return-of-earnings records
Skills Development Levies Act, 9 of 1999	Levy contribution records
Protection of Personal Information Act, 4 of 2013	Processing records, consents, operator agreements, data-subject requests, security-compromise records
Electronic Communications and Transactions Act, 25 of 2002	Electronic transaction and communication records
Consumer Protection Act, 68 of 2008	Customer agreements, terms, complaint records
Financial Intelligence Centre Act, 38 of 2001	Where applicable, verification and transaction records

7 Subjects and categories of records held

In terms of section 51(1)(e) of PAIA, the subjects on which Keychat holds records, and the categories of record within each subject, are as follows.

SUBJECT	CATEGORIES OF RECORDS
Company and statutory	Incorporation documents, memorandum of incorporation, share register, director records, board and shareholder resolutions, statutory filings
Financial	Annual financial statements, management accounts, ledgers, bank records, invoices, settlement and reconciliation records, tax records
Client and merchant	Onboarding records, service agreements, operator agreements, account configuration, billing records, correspondence, support tickets
End-customer data (held as operator)	Mobile numbers, names, delivery and collection addresses, order and transaction history, reservation and ticket records, loyalty balances, WhatsApp conversation records, marketing preferences and opt-out records
Personnel and human resources	Employment contracts, personal particulars, payroll, leave, performance, disciplinary and training records
Operational and technical	System architecture and configuration, integration records, access logs, audit trails, backup records, incident and change records

SUBJECT	CATEGORIES OF RECORDS
Marketing and business development	Prospect and enquiry records, campaign records, proposals, case study material
Supplier and service provider	Supplier agreements, operator agreements, service level records, invoices
Legal, risk and compliance	Contracts, correspondence with advisers, insurance, regulatory correspondence, data-subject requests, security-compromise records

8 Processing of personal information under POPIA

The particulars below are provided in terms of the PAIA Regulations of 2021, which require a private body to describe its processing of personal information in this manual. Our full Privacy Policy, published at keychat.co.za/privacy, contains the complete description.

8.1 Purposes of processing

We process personal information to take and fulfil orders, manage reservations and ticketing, arrange delivery and collection, process payments, operate loyalty programmes, provide customer support, send direct marketing where it is lawful to do so, prevent fraud and abuse, meet legal and tax obligations, and administer our contracts with merchants.

8.2 Categories of data subjects and personal information

CATEGORY OF DATA SUBJECT	PERSONAL INFORMATION PROCESSED
Merchant representatives and staff	Name, job title, business email, mobile number, login and activity records, billing details
Customers of merchants (processed as operator)	Mobile number, name, delivery address, order and transaction history, reservation and ticket details, loyalty balances, conversation content, marketing preferences
Prospective clients	Name, business contact details, enquiry and meeting records
Employees and contractors	Identity, contact, banking, payroll, tax, and employment records
Suppliers and service providers	Contact details of representatives, contract and payment records
Website visitors	IP address, device and browser information, page interaction data

We do not intentionally process special personal information as contemplated in section 26 of POPIA, nor the personal information of children as contemplated in section 34.

8.3 Recipients of personal information

Personal information may be shared with the following categories of recipient, each engaged as an operator under written agreement, and only to the extent necessary to deliver the service: the WhatsApp Business Platform provider (Meta Platforms); payment providers (Paystack, Yoco); point-of-sale and e-commerce integration providers (Lightspeed, Pilot, Shopify, Ecwid, Sage); delivery providers (Uber Direct, Picup, and merchant-appointed drivers); hosting and infrastructure providers (Cloudflare, DigitalOcean); and analytics and scheduling providers (Google). Personal information is also disclosed to regulators, courts, or law enforcement where the law requires it.

Keychat does not sell, rent, or trade personal information, and does not share one merchant's customer data with another merchant.

8.4 Cross-border transfers

Platform data is hosted in South African and European Union data centres. Certain service providers operate global infrastructure and may process personal information outside the Republic. Such transfers are made only on a basis permitted by section 72 of POPIA, and are governed by written data processing agreements.

8.5 Security safeguards

In terms of section 19 of POPIA we maintain appropriate, reasonable technical and organisational measures, including encryption of data in transit and at rest, role-based access control, network and denial-of-service protection at the edge, logging and monitoring of access to personal information, regular backups with tested restores, contractual confidentiality obligations on staff, written processing agreements with every operator, and periodic review of these safeguards against reasonably foreseeable risks.

9 How to request access to a record

9.1 Form of request

A request must be made on the prescribed **Form 2 (Request for Access to Record of Private Body)** contained in the PAIA Regulations, and delivered to the Information Officer at the address in section 3. The form is available from the Information Regulator's website.

9.2 What the request must contain

- Sufficient particulars to enable us to identify the record requested and to identify you as the requester.
- The form of access required, and postal or electronic details for delivery of a reply.
- An indication of the right you seek to exercise or protect, and an explanation of why the record is required to exercise or protect that right — this is required by section 50(1)(a) of PAIA.
- If the request is made on behalf of another person, proof of the capacity in which you are acting.
- If you are unable to read or write, or have a disability, you may make the request orally and the Information Officer will reduce it to writing and provide a copy.

9.3 Our decision

We will decide on the request within **30 days** of receiving it and notify you in writing of the outcome. That period may be extended by a further 30 days in the circumstances set out in section 57 of PAIA, in which case we will notify you of the extension and the reasons for it. If the request is refused, we will give adequate reasons, identify the provisions relied on, and explain the remedies available to you.

Where a request relates to a record containing personal information about a third party, we are obliged by section 71 of PAIA to take reasonable steps to inform that third party and give them an opportunity to make representations.

10 Fees

PAIA provides for two categories of fee: a **request fee**, payable on submission by a requester who is not a personal requester, and an **access fee**, covering the cost of searching for, preparing, reproducing, and delivering the record.

A **personal requester** — a person requesting a record containing their own personal information — does not pay a request fee, but may be required to pay an access fee for reproduction.

ITEM	FEE
Request fee (requester other than a personal requester)	R140.00
Photocopy or printed copy of an A4 page, or part thereof	R2.00
Copy in computer-readable form, on flash drive	R40.00
Transcription of visual images, per A4 page	As quoted by the service provider
Copy of visual images	As quoted by the service provider
Transcription of an audio record, per A4 page	R24.00
Searching for and preparing the record, per hour or part thereof, excluding the first hour	R145.00
Maximum total search and preparation fee	R435.00
Postage, email, or other delivery of the record	Actual cost

The first hour spent searching for and preparing a record is not charged for. Where the search and preparation is expected to exceed six hours, we may require a deposit of one third of the reproduction fees listed above before proceeding. If access is subsequently refused, any deposit paid is refunded. We may withhold a record until the applicable fee has been paid.

> Fees are those prescribed by regulation under PAIA and are amended from time to time by the Minister. The amounts above reflect the schedule applicable at the effective date of this manual. The current schedule published by the Information Regulator prevails in the event of any difference.

11 Grounds for refusing a request

PAIA obliges or permits a private body to refuse access in defined circumstances. A request may be refused where granting it would involve:

- the unreasonable disclosure of personal information about a third party who is a natural person, including a deceased person (section 63);
- disclosure of commercial information of a third party, such as trade secrets, or financial, commercial, scientific or technical information likely to cause harm (section 64);
- breach of a duty of confidence owed to a third party under an agreement (section 65);
- endangerment of the life or physical safety of an individual, or prejudice to the security of property or a system (section 66);
- disclosure of a record privileged from production in legal proceedings (section 67);
- disclosure of our own trade secrets or commercial information likely to cause harm, or information supplied in confidence the disclosure of which could reasonably be expected to prejudice us in negotiations or commercial competition (section 68);
- disclosure of research information of a third party or of Keychat which could expose the researcher or subject matter to serious disadvantage (section 69).

A request may also be refused where the record does not exist or cannot be found after a reasonable search, in which case we will notify you by way of an affidavit or affirmation as section 55 requires.

Despite the above, section 70 of PAIA requires disclosure where the record reveals a substantial contravention of the law or an imminent and serious public safety or environmental risk, and the public interest in disclosure clearly outweighs the harm.

12 Remedies available to you

There is **no internal appeal** against a decision of the Information Officer of a private body. If your request is refused, or you are dissatisfied with the fee, the form of access, or the extension of the deadline, you may:

- **Lodge a complaint with the Information Regulator** in terms of section 77A of PAIA, on the prescribed form, within 180 days of the decision; or
- **Apply to a court** with jurisdiction in terms of section 78 of PAIA for appropriate relief, within 180 days of the decision.

Information Regulator (South Africa)
Website: inforegulator.org.za
PAIA complaints: PAIAComplaints.IR@justice.gov.za
POPIA complaints: complaints.IR@justice.gov.za
General enquiries: enquiries.IR@justice.gov.za

13 Availability of this manual

This manual is available, free of charge, in English:

- on our website at keychat.co.za/privacy, where it is published for download;
- by email from the Information Officer, on request;
- for inspection at our registered address during normal business hours;
- at the offices of the Information Regulator.

14 Updating of this manual

This manual is reviewed at least annually, and whenever there is a material change to our operations, the records we hold, or our processing of personal information. The effective date and version number recorded at the top of this manual always reflect the current version.