

Uptooyoo Proprietary Limited
(Registration Number: 2025/446991/07)
("Uptooyoo")

Promotion of Access to Information Manual

Date: 23 April 2026

This manual was prepared in accordance with section 51 of the Promotion of Access to Information Act, 2 of 2000 ("PAIA") and to address requirements of the Protection of Personal Information Act, 4 of 2013 ("POPI").

Introduction and Purpose

Uptooyoo is registered as a profit company in terms of the Companies Act, 71 of 2008 under registration number: 2025/446991/07. Uptooyoo provides service provider listings and marketing services on the Uptooyoo Platform.

Uptooyoo has prepared this manual in terms of section 51 of the Promotion of Access to Information Act 2 of 2000 ("PAIA") and to address requirements of the Protection of Personal Information Act 4 of 2013 ("POPIA"). PAIA seeks to give effect to the provisions of section 32 of the Constitution, which provides that everyone has the right of access to any information held by another person that is required for the exercise or protection of any rights. Where a request is made in terms of PAIA to a private body, it is required to disclose the information (a) if the requester is able to show that the record is required for the exercise or protection of any rights; and (b) there are no grounds of refusal in PAIA applicable.

The objectives of this manual are to:

list the categories of records held by Uptooyoo which are available without a person having to submit a formal PAIA request;

provide a sufficient understanding of how to make a request for access to a record of Uptooyoo by describing the subjects on which Uptooyoo holds records and the categories of records held on each subject;

set out the categories of records of Uptooyoo which are available in accordance with any other legislation;

provide the relevant contact details of the Information Officer and Deputy Information Officer of Uptooyoo;

set out the purpose of processing of personal information by Uptooyoo and the description of the categories of data subjects and of the information relating thereto;

set out the recipients or categories of recipients to whom the personal information may be supplied;

inform persons that Uptooyoo does plan to transfer and process personal information outside of the Republic of South Africa and the categories of recipients to whom the personal information may be provided; and

set out Uptooyoo's security measures to ensure the confidentiality, integrity and availability of the personal information which is to be processed.

Information Regulator Guide

The Information Regulator (established in terms of POPIA) has compiled an official guide which contains information to assist a person wishing to exercise a right of access to information in terms of PAIA and POPIA. Copies of the updated Guide are available in all official languages from the Information Regulator free of charge.

The contact details of the Information Regulator are as follows:

Physical address: The Information Regulator (South Africa),
Woodmead North Park, 54 Maxwell Drive, Woodmead,
Johannesburg, 2191, Gauteng Province, South Africa

Postal address: PO Box 31533, Braamfontein, 2017

Telephone number: +27 80 001 7160 / +27 10 023 5200

PAIA Complaints email: PAIAComplaints@inforegulator.org.za

POPIA Complaints email: POPIAComplaints@inforegulator.org.za

General enquiries email: enquiries@inforegulator.org.za

Members of the public can inspect or make copies of the Guide from the offices of public and private

bodies, including the office of the Information Regulator, during normal working hours.

The Guide can also be obtained:

upon request to the Information Officer;

from the website of the Information Regulator, <https://inforegulator.org.za>.

Key Contact Details for Access to Information of Uptooyoo

Chief Information Officer

Uptooyoo has duly authorised and appointed the information officer below to whom requests for access to information must be made in terms of PAIA:

Name: Courtney Renier Wilson
Position: Information Officer
Telephone: +27 (0) 71 179 4691
E-mail: informationofficer@uptooyoo.com

The Information Officer appointed in terms of PAIA is the same person appointed as the Information Officer in terms of POPIA. The Information Officer oversees the functions and responsibilities as required for in terms of both PAIA as well as the duties and responsibilities in terms of section 55 of POPIA.

All requests for information in terms of PAIA and POPIA must be addressed to the Information Officer marked for her attention.

Head Office and Access to Information

Physical Address: Rich Rewards Group
Block B
Carlswald Close
137 Seventh Road
Midrand
South Africa
1682

Postal Address: The same as above
Telephone: +27 10 010 0423
E-mail: informationofficer@uptooyoo.com
Website Address: www.uptooyoo.com

Categories of Records of Uptooyoo which are available without a person having to request access Notice is hereby given of the following description of the categories of records of Uptooyoo that are voluntarily disclosed or automatically available without a person having to request access to them, the types of these records, and how they can be accessed. Certain of these records are only voluntarily disclosed or automatically available to members without request whilst other records are voluntarily disclosed or automatically available to all persons without request:

All information housed under the public areas of the www.uptooyoo.com website is automatically available and accessible for downloading, subject to our website disclaimer. No formal Request for Access is required to access this information. The aforesaid automatically available information is available on the www.uptooyoo.com website.

The notice in clause 4.1 above shall be updated as soon as practically possible after any amendment to the description occurs and made available:

to the Information Regulator; and
on the website, www.uptooyoo.com.

Description of the Records held by Uptooyoo

The following table identifies the subjects of records held by Uptooyoo together with a description of the categories of those records (section 51(1)(b)(iv) of PAIA) together with a description of the other legislation in terms of which they are available (section 51(1)(b)(iii) of PAIA):

Subjects of Records and Applicable Legislation	Category of Records
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<p>Statutory Company Information <i>Companies Act, 71 of 2008</i></p>	<ul style="list-style-type: none"> • Incorporation documents; • MOI; • Minute books; • Resolutions; • Registers of directors and officers; • Share registers and other statutory registers; • Statutory returns to relevant authorities; • Statutory records; and • Records relating to appointment of directors, auditors, company secretary, public officer and other officers.
<p>Financial and Accounting Records <i>Companies Act, 71 of 2008</i></p>	<ul style="list-style-type: none"> • Annual Financial Statements; • Accounting Records (inclusive of books of account); • Administrative Records; • Banking Records; • Audit reports; • Invoices; • Supporting schedules and documentation to books of account; and • Asset registers.

<ul style="list-style-type: none"> • Tax Records • <i>Income Tax Act, 58 of 1962, Value-Added Tax Act, 89 of 1991, Tax Administration Act, 28 of 2011, Skills Development Act, 97 of 1998, Unemployment Insurance Act, 63 of 2001, Compensation for Occupational Injuries and Diseases Act, 130 of 1993</i> 	<ul style="list-style-type: none"> • Income tax returns and other documentation; • Provisional tax returns and supporting schedules; • Dividend tax returns and supporting schedules; • PAYE records; • Skills Development Levies records; • UIF and Workmen's compensation; and • Value-added tax records.
<ul style="list-style-type: none"> • Employee Records • <i>Employment Equity Act, 55 of 1998, Basic Conditions of Employment Act, 75 of 1997, Broad Based Black Economic Empowerment Act, 53 of 2003, Occupation Health and Safety Act 85 of 1993, Promotion of Equality Prevention of Unfair Discrimination Act, 4 Of 2000, Skills Development Act, 97 of 1998, Unemployment Insurance Act, 63 of 2001, Unemployment Insurance Contributions Act, 4 of 2002, Labour Relations Act, 66 of 1995, Pension Fund Act, 24 of 1956, Compensation for Occupational Injuries and Diseases Act, 130 of 1993</i> 	<ul style="list-style-type: none"> • Arbitration awards; • CCMA records; • Code of conduct; • Employee tax records; • Confidentiality agreements; • Disciplinary records and internal evaluations; • Employee personal details; • Employment conditions and policies; • Employment contracts; • Internal correspondence; • Internal records, policies, procedures and agreements; • Leave records, including sick leave and family responsibility leave supporting documents; • Operating manuals; • Employee medical aid records; • Employee banking records; • Personnel records provided by personnel; • Remuneration and benefits records; • Service records; and • Training schedules and material.

<ul style="list-style-type: none"> • Customer Records / Third Party Records • <i>Value-Added Tax Act, 89 of 1991, Electronic Communications Act, 36 of 2005, National Credit Act, 34 of 2005</i> 	<ul style="list-style-type: none"> • Customer agreements (including but not limited to subscription and affiliate agreements and non-disclosure agreements); • Customer Information and records; • Debtors' information; • Code of conduct; • Supplier agreements; and • Transactional records and supporting information.
<p>Exchange Control</p> <p><i>Exchange Control Regulations, 1961</i></p>	<ul style="list-style-type: none"> • Exchange control applications; • Exchange control approvals; • Correspondence relating to the foregoing;
<ul style="list-style-type: none"> • Personal Information Records • <i>Protection of Personal Information Act, 4 of 2013</i> 	<ul style="list-style-type: none"> • PAIA manual; • Privacy Policy; • Personal information policies; • Personal Information compliance audit records; • Personal information of employees, clients, service providers, potential job candidates; and • Certificate of Information Officers.

Records available in terms of POPIA

Personal information is collected and processed by Uptooyoo for the specified purpose ordinarily disclosed when the information is collected. For more information on the purposes for which personal information is collected and processed, please refer to Uptooyoo's privacy policy (which is available at: <https://uptooyoo.com/Home/Privacy>) ("the Privacy Policy").

Uptooyoo collects the following personal information:

Data Subject	Type of Personal Information	Purpose	Recipients or Categories of Recipients to whom the personal information may be supplied
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<p>Employees</p>	<p>Name and contact details, identity numbers and documents, employment history, qualifications, references, banking details, payroll information, payment records, employment contracts, medical aid records, performance assessments, disciplinary records, leave records, training records, marital status, criminal records, CVs.</p>	<p>Verification of prospective employees' information for purposes of recruitment, to register employees on Uptooyoo's payroll, payments to employees, compliance with applicable labour laws, maintain necessary employment records.</p>	<p>Directors, employees, group or related entities, customers, medical service providers, insurance companies, pensions and provident funds, wellness or health providers, banks, contractors / vendors / suppliers / service providers, third party service providers, statutory oversight bodies, regulators or judicial commissions of enquiry making a request for personal information, enforcement agencies, public bodies which Uptooyoo engages with to discharge legal and public duties and or trading obligations including SARS, National Treasury and the Department of Labour, courts, administrative or judicial forum, arbitration, statutory commission, or ombudsman making a request for personal information or discovery in terms of the applicable rules, anyone making a successful request for access in terms of PAIA or POPIA.</p>
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Directors	Name and contact details, identity numbers and documents	Deliver notices to directors, maintain Uptooyoo's statutory compliance.	Shareholders, directors, employees, group or related entities, customers, banks, contractors / vendors / suppliers / service providers, third party service providers, statutory oversight bodies, regulators or judicial commissions of enquiry making a request for personal information, enforcement agencies, public bodies which Uptooyoo engages with to discharge legal and public duties and or trading obligations including SARS, CIPC, SARB, National Treasury and the Department of Labour, courts, administrative or judicial forum, arbitration, statutory commission, or ombudsman making a request for personal information or discovery in terms of the applicable rules, anyone making a successful request for access in terms of PAIA or POPIA.
Service Providers	Company registration details, income tax and VAT registration details, BEE certificates, payment details including bank accounts, invoices, contractual agreements, addresses, contact details, any records provided by service providers to Uptooyoo and records generated by Uptooyoo internally relating to the services provided.	Verification of information, to register or engage with suppliers, including payment of invoices.	Directors, employees, group or related entities, customers, banks, contractors / vendors / suppliers / service providers, third party service providers, statutory oversight bodies, regulators or judicial commissions of enquiry making a request for personal information, enforcement agencies, public bodies which Uptooyoo engages with to discharge legal and public duties and or trading obligations including SARS, SARB and National Treasury, courts, administrative or judicial forum, arbitration, statutory commission, or ombudsman making a request for personal information or discovery in terms of the applicable rules, anyone making a successful request for access in terms of PAIA or POPIA.

<p>Consultants or contractors</p>	<p>Dependant on the nature of the consultant or contractor but may include information identified under employees or service providers.</p>	<p>Same purposes listed above.</p>	<p>Directors, employees, group or related entities, customers, insurance companies, banks, contractors / vendors / suppliers / service providers, third party service providers, statutory oversight bodies, regulators or judicial commissions of enquiry making a request for personal information, enforcement agencies, public bodies which Uptooyoo engages with to discharge legal and public duties and or trading obligations including SARS, SARB, National Treasury and the Department of Labour, courts, administrative or judicial forum, arbitration, statutory commission, or ombudsman making a request for personal information or discovery in terms of the applicable rules, anyone making a successful request for access in terms of PAIA or POPIA.</p>
<p>Customers</p>	<p>Name and contact details, identity numbers and documents, registration numbers, date of birth or registration, banking / credit card information.</p>	<p>Create and maintain an account for each customer, provide the customer with access to Uptooyoo's software and for billing purposes.</p>	<p>Directors, employees, group or related entities, banks, contractors / vendors / suppliers / service providers, third party service providers, statutory oversight bodies, regulators or judicial commissions of enquiry making a request for personal information, enforcement agencies, public bodies which Uptooyoo engages with to discharge legal and public duties and or trading obligations including SARS, SARB, National Treasury and the Department of Labour, courts, administrative or judicial forum, arbitration, statutory commission, or ombudsman making a request for personal information or discovery in terms of the applicable rules, anyone making a successful request for access in terms of PAIA or POPIA.</p>

Shareholders and Beneficial Owners	Name and contact details, identity numbers and documents or registration numbers, date of birth or registration, registration or founding documents.	Maintain securities register and statutory compliance.	Directors, employees, group or related entities, customers, insurance companies, banks, contractors / vendors / suppliers / service providers, third party service providers, statutory oversight bodies, regulators or judicial commissions of enquiry making a request for personal information, enforcement agencies, public bodies which Uptooyoo engages with to discharge legal and public duties and or trading obligations including SARS, CIPC, National Treasury and the Department of Labour, courts, administrative or judicial forum, arbitration, statutory commission, or ombudsman making a request for personal information or discovery in terms of the applicable rules, anyone making a successful request for access in terms of PAIA or POPIA.
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Planned transborder flows of personal information

Uptooyoo may from time to time disclose personal information that it processes to employees, directors, subsidiaries or third-party service providers outside of South Africa, such as cloud service providers. Personal information will only be transferred to those countries that have similar data privacy laws in place or where the recipient of the personal information is bound contractually to a no lesser set of obligations than those imposed by POPIA and our confidentiality and security requirements.

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

Uptooyoo implements the following measures to ensure the confidentiality, security, integrity and availability of personal information in its possession:

- limiting access to information to those persons who require access to the information on a need-to-know basis in accordance with the purpose for the processing of that information;
- firewalls, authentication software, intrusion detection systems and unique user profiles;
- use of anti-virus protection software and anti-malware solutions and protocols;
- physical controls;
- secure setup of hardware and software making up the IT infrastructure;
- outsourced service providers who are contracted to implement security controls; and
- information security policy.

Right to Refuse Access to Information

It must be noted that the action of applying for access to information does not guarantee access thereto. Each application for access to information will be considered on its own merits.

Uptooyoo has the right to refuse access to records where:

- the record would unreasonably disclose personal information about a natural person, including a deceased individual (unless written permission for access is granted);

the record contains one of the following:

financial, commercial, scientific or technical information whereby the disclosure thereof could likely cause harm to the financial or commercial interests of a third party or **Uptooyoo**;

information about research by a third party or **Uptooyoo** which could put that third party or the entity at a disadvantage in a negotiation or prejudice him in competition, unless written consent is given;

access would put the entity in breach of a duty of confidence which we owe a third party unless that third party gives written consent for access to be granted;

access could be expected to endanger someone's life or physical safety, prejudice or impair the security of a building, structure, system, means of transport or other property;

the record is privileged from being produced as evidence in legal proceedings, unless the person protected has waived that protection;

if the request is for access to your personal information and you could not provide adequate proof of identity to **Uptooyoo**; and

requests for information that are frivolous or vexatious, or which involve an unreasonable diversion of resources shall be refused.

Procedure for Requesting Records

Form of request

The requester is required to use the prescribed Form 2 annexed hereto as **Annexure A** to submit a request for access to a record held by **Uptooyoo**. The request is required to be made to the address or e-mail address of the Information Officer and should be clearly addressed to the Information Officer.

The Form 2 must be completed in accordance with the following:

The form must be completed in English with type or print in **BLOCK LETTERS**.

Answer every question. If a question does not apply, state "N/A" in response to that question. If there is nothing to disclose in reply to a particular question state "N/A" in response to that question. In the event of insufficient space in which to answer a question, additional information may be provided on an additional folio, to be attached to the form.

A certified copy of a legally acceptable form of identity must be attached to authenticate identity of the Requester.

In the event of third-party Requester, the person must attach to the form a certified legally acceptable form of identity of the person on whose behalf the request is lodged together with the proof of the capacity in which the third party is acting and a certified copy of the identity document or other legal form of identity of the third party.

The requester is required to provide sufficient particularity on the request form to enable the Information Officer to identify the record and the requester. The requester should also indicate which form of access to the record is required and if he or she wishes to be informed in any other manner and state the necessary particulars to be so informed.

The requester is required to state the right that he or she is seeking to exercise or protect and provide a written explanation as to why the requested record is required for the exercise or protection of that right.

The Information Officer will consider the request and will provide the Requester with his decision in accordance with the prescribed form 3 annexed hereto as **Annexure B**.

For POPIA-related requests to object to the processing of personal information, correct or delete personal information, the request must be made in writing on the applicable prescribed **Form 1 (objection)** or **Form 2 (correction or deletion)**, annexed hereto as **Annexure C** and **Annexure D**, respectively.

Prescribed Fees

There are two categories of fees payable:

The request fee is an administration fee that is payable on submission of the request for access and must be paid before the request for access is considered (unless the request is to access the Requester's personal information in which event there is no fee). The request fee is not refundable if the request for access has been granted but is refundable if the request is denied.

The Access Fee is payable prior to the Requester gaining access to the records in the requested form.

The access fee is intended to reimburse **Uptooyoo** for the costs involved in reproduction of documents, searching, and preparing the record requested and for any time reasonably required (more than the prescribed hours) to search and prepare the record.

The current fees are set out in **Annexure E** and may change from time to time as set out in the Regulations.

Applicable time-periods

Uptooyoo will inform the requester its decision of whether to grant the request or not within 30 (thirty) days after receipt of the request.

If all reasonable steps have been taken to find a requested record requested and there are reasonable grounds for believing that the record cannot be found, or does not exist, the Information Officer will, by way of affidavit or affirmation, notify the requester that it is not possible to give access to that record.

The period provided in clause 8.3.1 above may be extended for a period of a further 30 (thirty) days should the request be for a large number of records or requires an extensive search through a number of records which would unreasonably affect the day to day workings of Uptooyoo.

Availability of this Manual

A copy of this manual is available:

at www.uptooyoo.com;

at the head office of Uptooyoo for public inspection during normal business hours;

to any person upon request and upon the payment of a reasonable prescribed fee; and

to the Information Regulator upon request.

Updating of this Manual

The directors of Uptooyoo will, on a regular basis, update this manual.

Annexure “A”

PRESCRIBED REQUEST FORM

Annexure “B”

PRESCRIBED OUTCOME FORM

Annexure “C”

PRESCRIBED OBJECTION FORM

Annexure “D”

PRESCRIBED REQUEST FORM

PRESCRIBED FEES