

DEPANSUM (PTY) LTD

“DEPANSUM”

THE PROMOTION OF ACCESS TO INFORMATION MANUAL

“THE MANUAL”

Table of Contents

1. INTRODUCTION	3
2. ABOUT DEPANSUM	3
3. CONTACT DETAILS.....	4
4. INFORMATION REGULATOR'S GUIDE.....	4
5. PUBLICLY AND AUTOMATICALLY AVAILABLE RECORDS	4
6. DISCLOSURES ON REQUEST	5
7. RECORDS AVAILABLE IN ACCORDANCE WITH OTHER LEGISLATION	5
8. PROCESSING OF PERSONAL INFORMATION	6
9. ACCESS REQUEST PROCEDURE	9
11. AVAILABILITY OF THE MANUAL	11

1. INTRODUCTION

In terms of the Promotion of Access to Information Act, 2 of 2000 (PAIA), everyone has the right to request access to records held by public and private bodies. This Manual explains how members of the public can exercise that right with Depansum (PTY) LTD (“**Depansum**”).

The purpose of this Manual is to provide clear information about:

- (a) **What records we hold** – the types of information and documents kept by Depansum.
- (b) **How to request access** – the step-by-step process to make a request for information.
- (c) **Who to contact** – the designated Information Officer responsible for handling requests.
- (d) **When access may be refused** – the reasons under PAIA and other laws why certain information may not be released.

This manual is a living document and will be reviewed periodically to ensure that it remains up-to-date with legislative changes, operational developments, and the needs of those seeking access to information.

Depansum is committed to balancing the right of access to information with the protection of privacy, confidentiality, and legitimate commercial interests, and will facilitate access to records in a timely, reasonable, and lawful manner.

This Manual is published in accordance with section 51 of PAIA and the Regulations Relating to the Promotion of Access to Information, 2021. It also sets out Depansum’s practices for the processing of personal information as required under the Protection of Personal Information Act, 2013 (POPIA).

For more information or to submit a request, please contact our Information Officer as detailed in this manual.

VERSION	DATE	DESCRIPTION
1.0	December 2025	Approved by Local Board of Directors or relevant officers (as applicable)

2. ABOUT DEPANSUM

Depansum (Registration Number - 2020/667256/07) is a private company incorporated in South Africa and forms part of the dLocal Group corporate structure. Depansum provides payment-related services in South Africa. Depansum acts as a responsible party for certain processing activities and as an operator for others, depending on the relevant data processing context. Depansum is committed to operating transparently, responsibly, and in accordance with applicable South African laws and regulations.

3. CONTACT DETAILS

Chief Information Officer: Agustin Cerisola

Deputy Information Officer: N/A

Email: corporate@dlocal.com
dpo_africa@dlocal.com

Physical address: Unit G05, Century Gate Office Park, CNR Bosmansdam Road & Century Way, Western Cape, 7441.

Postal address: P O Box 1712, Milnerton, Western Cape, 7435.

The Information Officer is responsible for receiving and coordinating PAIA requests and POPIA data subject requests, ensuring compliance, and maintaining this Manual.

4. INFORMATION REGULATOR'S GUIDE

The Information Regulator has published a guide to help people understand how to request access to information under the PAIA. This Guide explains the process for making a request, what fees may apply, reasons why access might be refused, and how to appeal a decision if access is denied.

Members of the public who want to request information from Depansum can consult this Guide to make sure their request is submitted correctly and in line with PAIA. The Guide is available for free on the Information Regulator's website or in printed form on request to the Information Regulator.

Website: <https://infoeregulator.org.za/paia/>

5. PUBLICLY AND AUTOMATICALLY AVAILABLE RECORDS

The following categories of records are automatically available without submission of Form C under PAIA and may be accessed via our website or on request from the Information Officer:

Category of Records	Types of Records
Corporate information	Public company filings (to the extent filed with CIPC), registered office and directors' details as permitted by law.
Policies	Privacy notice, cookie notice, website terms of use, anti-bribery statement (where applicable).
Marketing materials and press releases	As published

Job vacancies and recruitment notices	As published
PAIA Manual	

Note: Records that are publicly and automatically available need not be formally requested in terms of this Manual.

6. DISCLOSURES ON REQUEST

Category of Records	Types of Records
Operational records	Client or counterparty onboarding documentation, supplier contracts, service level agreements, internal policies and procedures (non-confidential versions), incident logs.
Financial records	Audited financial statements (if publicly available), tax records, invoices and receipts, subject to lawful limitations.
Human resource records	Employment contracts, payroll records, training records, disciplinary records, subject to privacy limitations and applicable labour laws.
Compliance records	Licenses and registrations, such as business and tax registration (if applicable), AML/CFT compliance policies (non-confidential versions), POPIA compliance documentation (e.g., risk assessments—summary form), PAIA request logs.

Certain records may only be provided in redacted form to protect personal information, trade secrets, or security-sensitive information.

7. RECORDS AVAILABLE IN ACCORDANCE WITH OTHER LEGISLATION

Category of Records	Applicable Legislation
Memorandum of Incorporation; Company registers; Director and shareholder records	Companies Act, 2008
PAIA Manual and access request records	Promotion of Access to Information Act, 2000

POPIA compliance records (e.g., IO registration, policies/addenda, security incident records)	Protection of Personal Information Act, 2013 and Regulations
Employment and HR records (e.g., contracts, policies, statutory returns)	Basic Conditions of Employment Act, 1997; Labour Relations Act, 1995; Employment Equity Act, 1998; Unemployment Insurance, 2001
Tax records (e.g., VAT, PAYE, CIT)	Income Tax Act; VAT Act
Occupational Health and Safety and Compensation records, incident reports, medical surveillance—as applicable	Occupational Health and Safety Act, 1993; Compensation for Occupational Injuries and Diseases Act, 1993

8. PROCESSING OF PERSONAL INFORMATION

8.1. Purpose of Processing Personal Information

Depansum processes personal information to operate payment services (including onboarding and servicing merchants and suppliers), manage employment relationships, and to comply with legal/regulatory obligations, including preventing fraud.

8.2. Lawful Basis For Processing Personal Information

Depansum processes personal information on lawful bases including compliance with legal obligations, performance of a contract, legitimate interests (balanced against data subject rights), consent (where applicable), and the exercise or defence of legal claims.

8.3. Categories of Personal Information

Depansum may process information relating to data subjects, including juristic persons, such information may include, but is not limited to, the following:

- **Identity Data** includes first name, last name, username, ID document number;
- **Contact Data** includes, contact details billing address, delivery address, email address and telephone number;
- **Demographic Data** includes gender, marital status;
- **Employment Data** includes employment history, salary, benefits information, compensation history; performance information;
- **Recruitment Data** includes CVs, references, right-to-work documentation
- **Technical Data** includes your internet protocol (IP) address, your login data, Google Analytics ID, internet browser and device type, time zone setting, location data and your use of our website, including which pages you visited, how you got to our Website, the time and length of your visit and your language preferences;

- **Profile Data** includes the username and password of our Customer's representatives when they log in the Merchant Dashboard;
- **Marketing and Communications Data** includes your name, position and business details and includes your preferences in receiving marketing from us and our third parties and your communication preferences; and
- **Financial Data** includes card data, bank account data, fiscal information.
- **Special personal information** (as defined in POPIA) is only processed where lawful, including biometric identifiers (where applicable), criminal behaviour information (e.g., for due diligence), and children's information (only where necessary and lawful).

8.4. Categories of Data Subjects

Depansum holds information on the following categories of data subjects:

- Employees
- Job Applicants
- Customers
- End Users
- Service Providers

8.5. Recipients or Categories of Recipients

Personal information may be shared, where lawful and necessary, with:

- Regulators/supervisory authorities in South Africa for compliance and reporting.
- Contracted operators/service providers (e.g., cloud and IT services) under appropriate agreements and safeguards.
- Affiliated group entities (intra-group transfers) subject to appropriate safeguards.
- Financial institutions, payment networks, and counterparties involved in transactions.
- Law enforcement, courts, or other public bodies as required or permitted by law.

8.6. Planned Transborder Flows of Personal Information

Depansum South Africa may transfer or store personal information outside South Africa in accordance with POPIA section 72 where conditions are met (e.g., adequate protection by law/binding rules/agreements; data subject consent; contractual necessity; or other lawful bases). Cross-border transfers must be documented and approved under internal procedures, including transfer impact assessments and appropriate safeguards in contracts with recipients.

Where transfers are made to countries that do not provide an adequate level of protection, Depansum implements appropriate safeguards, such as binding corporate rules or contractual clauses, and ensures data subject rights and effective legal remedies are available.

8.7. General Description of Information Security Measures implemented by Depansum

Depansum South Africa implements appropriate technical and organisational measures consistent with group privacy and security standards (e.g., access controls, encryption, logging/monitoring, incident management) and maintains a Data Breach Notification framework aligned with POPIA.

Depansum maintains policies and procedures for information security, access management, vulnerability and patch management, business continuity, and incident response. Personal data breaches will be assessed and notified to the Information Regulator and affected data subjects where legally required, within applicable timelines.

8.8. Data Subject Rights

Data subjects have the right to:

- access their personal information;
- request correction or deletion;
- object to or restrict processing;
- withdraw consent where processing is based on consent;
- lodge a complaint with the Information Regulator. Requests can be submitted as set out in section 9 of this Manual.

8.9. Notice to Data Subjects

Depansum's external Privacy Notice supplements this Manual by providing detailed information about processing activities, lawful bases, international transfers, data subject rights, and contact details. The Privacy Notice is available at <https://www.dlocal.com/legal/privacy-hub/>.

8.10. Retention

Depansum retains personal information only for as long as necessary to fulfil the purposes for which it was collected or to comply with legal, regulatory, or contractual obligations, after which it is securely deleted or anonymised.

8.11. Children's Information

Depansum does not intentionally process children's personal information except where lawful and necessary in the context of employment benefits, statutory compliance, or service provision, and subject to POPIA's requirements.

8.12. Direct Marketing

Depansum conducts direct marketing in accordance with POPIA and the Consumer Protection Act. Recipients may opt out at any time using the mechanisms provided in communications.

8.13. Cookies and Online Tracking

Depansum's use of cookies and similar technologies is described in the Cookie Notice. Website users can manage preferences via the cookie banner and browser settings.

9. ACCESS REQUEST PROCEDURE

Any person who wishes to access a record held by Depansum must follow the procedure set out below. This ensures that requests are processed fairly, lawfully, and efficiently.

9.1. Submitting a Request

All requests for access to records must be made in writing using the prescribed **Form C** available on the Information Regulator's website (<https://www.inforegulator.org.za>).

The completed form must be submitted to the Information Officer at the contact details provided in this Manual. Requests may be sent by hand, post, or email (where applicable).

POPIA-related Requests – All requests relating to POPIA must be submitted through the [LINK](#). Alternatively, POPIA data subject requests may be submitted directly to the Information Officer via the contact details provided in section 3. All communication and all actions taken by Depansum regarding your POPIA-related rights are provided free of charge. Depansum reserves the right, in the case of clearly unfounded or unreasonable requests, to either take out a reasonable fee covering the administrative costs of providing the information or taking the requested action or refusing to fulfil the requested action.

The requester must indicate the preferred form of access (inspection, paper copy, electronic copy, or transcript), subject to practicality and legal limitations. Where a request relates to information about third parties, Depansum will follow the consultation procedures required under PAIA.

9.2. Proof of Identity

To protect personal information and prevent unauthorised access, all requesters must provide adequate proof of identity before a request will be processed. Individuals must submit a certified copy of their South African identity document, passport, or other official identification. Where a request is made on behalf of another person, the requester must provide a power of attorney or other written authorisation confirming their authority, together with proof of both parties' identities. In the case of a juristic person (such as a company), proof of registration and the identity of the authorised representative must be provided.

Failure to provide adequate proof of identity or authority may result in the request being refused or delayed until such proof is received.

Where Depansum reasonably requires further information to locate the record or to verify identity, the requester will be informed accordingly.

9.3. Prescribed Fees

In terms of PAIA, a **request fee** may be payable before the request is processed. If the request is granted, an **access fee** may also be charged for the reproduction, search, and preparation of the record(s). The requester will be notified of any applicable fees before the request is processed.

A request will not be processed until the required fees have been paid.

Fees are charged in accordance with the PAIA Regulations. A deposit may be required where the search and preparation of records will take substantial time.

9.4. Acknowledgement and Response Time

Once the request is received, Depansum will acknowledge receipt and process the request within thirty (30) days.

If additional time is required to process the request (for example, due to the volume or complexity of the records), the requester will be notified in writing, as allowed under section 26 of PAIA.

The 30-day period may be extended for a further period not exceeding 30 days in accordance with PAIA, and the requester will be informed of the extension and reasons.

9.5. Notification of Decision

The requester will be informed in writing of the decision, whether access is granted or refused, and of any applicable conditions or fees.

If the request for access is granted, arrangements will be made for the requester to inspect or collect the record in the requested form, subject to payment of any applicable access fees. If the request is refused, the written notification will include the reasons for refusal and the provisions of PAIA relied upon.

Where only part of the record is exempt, Depansum will provide access to the remainder, with appropriate redactions.

9.6. Grounds for Refusal of Access

Access to certain records may be lawfully **refused** to protect legitimate interests and the rights of others. Depansum is obliged to consider every request carefully; however, access may be denied on specific grounds as provided in Chapter 4 of PAIA. These

grounds include (but are not limited to) instances where the disclosure of the record would:

- unreasonably disclose personal information about a third party;
- reveal commercial, financial, confidential, or trade secret information belonging to Depansum or a third party;
- endanger the life or physical safety of an individual;
- prejudice or impair the protection of property or law enforcement efforts;
- constitute a breach of duty of confidence owed to another person;
- prejudice Depansum's commercial or competitive position; or
- be prohibited by law.

Each request is considered on its own merits, and Depansum will only refuse access when a valid ground under PAIA applies. Refusal decisions will identify the specific sections of PAIA relied upon and inform the requester of their rights of review.

9.7. Remedies Available upon Refusal of Access Request

Where a request for access is refused, the requester will be advised of their right to lodge a complaint with the Information Regulator or to apply to a court for relief in terms of PAIA.

Complaints to the Information Regulator may be lodged in the prescribed form. A requester may also seek an internal appeal only where Depansum is a public body; as a private body, internal appeals do not apply. Requesters may apply to a court with jurisdiction for appropriate relief.

9.8. Records that cannot be found or do not exist

If, after reasonable steps, the record cannot be found or does not exist, Depansum will notify the requester in writing. If the record is later found, the requester will be notified and may then access the record subject to applicable requirements.

10. VERSION CONTROL AND REVIEW

This Manual will be reviewed at least annually or upon material legislative or operational changes. The Information Officer is responsible for initiating reviews and updates.

11. AVAILABILITY OF THE MANUAL

This Manual is available:

- on <https://www.dlocal.com/>.
- for public inspection during normal business hours at the Head office of Depansum;
- to any person upon request and upon the payment of a reasonable prescribed fee; and
- to the Information Regulator upon request.