

PAIA MANUAL

Prepared in terms of Section 51 of the Promotion of Access to Information Act, 2 of 2000 and incorporating the requirements of the Protection of Personal Information Act, 4 of 2013

Comcorp Online (Pty) Ltd
Registration Number: 1999/028675/07

Version 2.0
July 2026

1. Introduction

Comcorp Online (Pty) Ltd is a South African software company specialising in authentication, verification, mortgage origination and secure data solutions. This manual is compiled in accordance with PAIA and POPIA and explains how records may be requested.

2. Purpose of the Manual

The purpose of this manual is to promote transparency and accountability and to set out the procedure to obtain access to records held by Comcorp.

3. Scope

This manual applies to:

Comcorp Online (Pty) Ltd (1999/028675/07)

Comcorp Mortgage Software (Pty) Ltd (2013/201886/07) and

Comcorp Holdings (Pty) Ltd (2004/004810/07)

4. Information Officer

Information Officer: Daniel Isaacs

Email: enquiries@comcorp.co.za

Telephone: +27 10 594 2768

Address: 1st Floor, Fulham House, Hampton Office Park, 20 Georgian Crescent East, Bryanston, Johannesburg.

5. Availability of the Manual

This manual is available on the company website, at the company's offices and on request from the Information Officer.

6. Information Regulator

Website: www.inforegulator.org.za

General enquiries: enquiries@inforegulator.org.za

Complaints may be lodged with the Information Regulator.

7. Applicable Legislation

Comcorp is subject to legislation including PAIA, POPIA, the Companies Act, Basic Conditions of Employment Act, Employment Equity Act, Labour Relations Act, Occupational Health and Safety Act, Income Tax Act, VAT Act, Electronic Communications and Transactions Act and the National Credit Act.

8. Categories of Records Held

Category	Examples	Availability
Corporate	MOI, registration certificates, shareholder records	On request
Finance	Accounting records, tax records, banking information	On request
Human Resources	Employment contracts, payroll records	On request
Operations	Policies, procedures and governance records	On request
Client Records	Client agreements and correspondence	On request
Supplier Records	Supplier contracts and procurement records	On request
Technology	System logs, security and access records	On request
Marketing	Brochures, presentations and website content	Public/On request
Legal	Licences, compliance records and litigation files	On request

9. Processing of Personal Information

Comcorp processes personal information relating to employees, prospective employees, clients, suppliers, service providers and website users.

10. Categories of Data Subjects

Employees; directors; customers; mortgage originators; suppliers; payroll providers; financial institutions; website visitors and prospective clients.

11. Categories of Personal Information

Identity numbers, contact information, employment information, financial information, biometric information, device information and records required for legal compliance.

11A. Special Personal Information

In addition to the categories listed in paragraph 11, Comcorp processes biometric information (facial images and derived facial templates) through its Curata product, for the purpose of identity verification and authentication on behalf of its clients.

Biometric information constitutes Special Personal Information as defined in section 26 of POPIA. Comcorp only processes this information where the data subject has given explicit consent, or where another ground under section 27 of POPIA applies (for example, where processing is necessary for the establishment, exercise or defense of a right or obligation in law). Where Comcorp processes biometric information as an Operator on behalf of a

client, the client (as Responsible Party) is responsible for obtaining the necessary consent from the data subject before initiating the verification request, in accordance with the applicable service agreement.

Biometric templates are not retained by Comcorp beyond what is required to complete the transaction, unless a longer retention period is required by law or agreed with the client for audit purposes.

12. Purpose of Processing

To provide services, authenticate identities, verify income, fulfil contracts, comply with legislation, manage employees and maintain security.

13. Recipients of Information

Banks, financial institutions, regulators, payroll providers, professional advisers, service providers and law-enforcement agencies where required.

14. Cross-border Transfers

Comcorp's core platform is hosted on Microsoft Azure infrastructure within South Africa. In the course of providing its services, Comcorp transfers certain categories of personal information outside the Republic to the following categories of recipients:

Biometric verification data (Curata): processed by Comcorp's biometric technology partner, on infrastructure located in the EU, both of which fall under the European Union's GDPR framework.

Payslip/income data (SPX): where sourced via payroll integration, certain processing may occur on infrastructure operated in the United Kingdom.

These transfers are conducted in accordance with section 72 of POPIA, on the basis that the recipient is subject to a law, binding corporate rules, or a binding agreement which provides an adequate level of protection substantially similar to POPIA's conditions, and/or the data subject has consented to the transfer.

15. Security Safeguards

Comcorp applies access controls, encryption, monitoring, audit trails, password management, disaster recovery measures and other technical safeguards.

16. Retention and Destruction

Records are retained in accordance with legal, contractual and operational requirements and are securely destroyed when no longer required.

17. Data Subject Rights

Data subjects may request access, correction, deletion, restriction of processing and may object to certain processing activities subject to applicable law.

18. Request Procedure

Requests for access to records must be submitted on Form 2 prescribed by the PAIA Regulations. Sufficient information must be supplied to identify the requester and the records requested.

19. Fees

Fees payable in respect of requests will be charged in accordance with the prescribed PAIA Regulations as amended from time to time.

20. Timeframes

The Information Officer will respond within the statutory periods prescribed by PAIA.

21. Grounds for Refusal

Access may be refused to protect privacy, commercially sensitive information, confidential information, legally privileged records and the security of individuals or systems.

22. Remedies

A requester may lodge a complaint with the Information Regulator or approach a competent court.

23. Internal PAIA Register

Comcorp maintains a register of requests received and their outcomes for annual reporting purposes.

24. Website Publication

The current version of this manual will be maintained on the company website and reviewed periodically.

25. Version Control

Version 2.0 — July 2026

This manual is reviewed at least annually, and additionally whenever there is a material change to Comcorp's processing activities or to applicable legislation. The next scheduled review is due by July 2027.

Annexure A – Standard PAIA Request Process

- Complete Form 2.
- Submit the form to enquiries@comcorp.co.za.
- Provide proof of identity.
- Pay the prescribed fee where applicable.
- Receive acknowledgement and reference number.
- Receive a decision within the legislated timeframe.

Annexure B – Review Schedule

- This manual should be reviewed annually when legislative changes require updates.
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