



# PAIA Manual

Prepared in terms of section 51 of PAIA | Aligned with POPIA

<b>Company</b>	Swoop Financial Solutions (Pty) Ltd
<b>Registration number</b>	2023/883589/07
<b>FSP number</b>	53726
<b>FIC status</b>	Registered Accountable Institution
<b>Website</b>	<a href="https://myswoop.co.za">https://myswoop.co.za</a>
<b>Information Officer</b>	Divan Myburgh
<b>Access request email</b>	admin@myswoop.co.za
<b>General email</b>	info@myswoop.co.za
<b>Telephone</b>	+27 72 727 2564
<b>Registered address</b>	17 Lundy Island Avenue, Plettenberg Bay, 6600, South Africa

<b>Version</b>	v1.0	<b>Effective date</b>	1 June 2026
<b>Date compiled</b>	1 June 2026	<b>Date revised</b>	1 June 2026
<b>Classification</b>	Public	<b>Owner</b>	Information Officer
<b>Review cycle</b>	At least annually	<b>Next review</b>	1 June 2027

## Contents

Section	Topic
1	Acronyms and abbreviations
2	Purpose of this manual
3	About Swoop
4	Contact details for access to information
5	Information Regulator Guide and forms
6	Automatically available information
7	Records available under other legislation
8	Subjects and categories of records held by Swoop
9	Processing of personal information under POPIA
10	PAIA request procedure
11	Fees
12	Grounds for refusal and third-party records
13	Remedies available to requesters
14	Availability and updating of this manual
15	Annexure guidance and official forms

## 1. Acronyms and abbreviations

Term	Meaning
CASP	Crypto Asset Service Provider
DIO	Deputy Information Officer
FAIS	Financial Advisory and Intermediary Services Act 37 of 2002
FIC	Financial Intelligence Centre
FIC Act	Financial Intelligence Centre Act 38 of 2001

Term	Meaning
FSP	Financial Services Provider
IO	Information Officer
PAIA	Promotion of Access to Information Act 2 of 2000, as amended
POPIA	Protection of Personal Information Act 4 of 2013
Regulator	Information Regulator (South Africa)

## 2. Purpose of this manual

This manual explains the categories of records held by Swoop, how a person may request access to those records, the contact details for access requests, the POPIA information that must be made available, and the remedies available if a requester is not satisfied with the outcome of a request.

- assist the public to understand the records Swoop holds and which records may be publicly available;
- explain how to make a formal request for access to records under PAIA;
- describe the records Swoop holds in terms of other South African legislation;
- describe the categories of data subjects and personal information processed by Swoop;
- identify recipients or categories of recipients to whom personal information may be supplied;
- describe planned or possible cross-border processing of personal information; and
- summarise information security measures used to protect personal information.

### Important access note

Listing a category of records in this manual does not mean that access will automatically be granted. Each request will be assessed under PAIA, POPIA and any other applicable law. Swoop may refuse access where a lawful ground for refusal applies.

## 3. About Swoop

Swoop Financial Solutions (Pty) Ltd is a South African Bitcoin-first fintech and crypto asset service provider. Swoop is an authorised financial services provider with FSP number 53726 and is registered as an Accountable Institution with the Financial Intelligence Centre.

Swoop provides, or is building, services that may include BTC-to-ZAR conversion, ZAR-to-BTC buy flows, foreign currency to ZAR transfer flows using Bitcoin or Lightning as the settlement rail, Bitcoin Under Management education and onboarding, and related crypto asset service workflows.

Swoop's records include company, governance, compliance, client onboarding, transaction, monitoring, service provider, technology, financial and regulatory records necessary to operate and supervise these services.

## 4. Contact details for access to information

Contact item	Details
Information Officer	Divan Myburgh
Access request email	admin@myswoop.co.za
General email	info@myswoop.co.za

Contact item	Details
Telephone	+27 72 727 2564
Website	<a href="https://myswoop.co.za">https://myswoop.co.za</a>
Registered address	17 Lundy Island Avenue, Plettenberg Bay, 6600, South Africa
Preferred request subject line	PAIA Request - Swoop Financial Solutions

All PAIA requests and POPIA access, correction, deletion or objection requests should be sent to the Information Officer using the contact details above. Swoop may ask the requester to provide proof of identity, proof of authority or further particulars before processing a request.

## 5. Information Regulator Guide and forms

The Information Regulator publishes a Guide on how to use PAIA and official PAIA and POPIA forms. The Guide and forms are available from the Regulator's website and may also be requested from Swoop's Information Officer.

Resource	Where to access it
Information Regulator website	<a href="https://inforegulator.org.za">https://inforegulator.org.za</a>
PAIA resources and Guide	<a href="https://inforegulator.org.za/paia/">https://inforegulator.org.za/paia/</a>
PAIA forms, including Form 2 and Form 3	<a href="https://inforegulator.org.za/paia-forms/">https://inforegulator.org.za/paia-forms/</a>
POPIA forms, including objection and correction/deletion forms	<a href="https://inforegulator.org.za/popia-forms/">https://inforegulator.org.za/popia-forms/</a>
Regulator complaints page	<a href="https://inforegulator.org.za/complaints/">https://inforegulator.org.za/complaints/</a>
Regulator contact	enquiries@inforegulator.org.za   010 023 5200   Woodmead North Office Park, 54 Maxwell Drive, Woodmead, Johannesburg, 2191

A person who needs reasonable assistance with a PAIA request may contact the Information Officer. The Regulator may also provide assistance to requesters and data subjects.

## 6. Automatically available information

The following records may be available without a formal PAIA request, usually via the website, public channels or request to Swoop.

Category	Examples	Access route
Website and public company information	Website pages, contact details, public product descriptions, public regulatory statements	Website or request
Legal website documents	Terms and Conditions, Privacy Policy, PAIA Manual, KYC and AML Policy summary	Website or request

Category	Examples	Access route
Client support information	Contact routes, service updates, generic FAQs or support notices	Website or request
Public social media and marketing	Public posts, newsletters and announcements	Public channels
Information Regulator forms	PAIA and POPIA forms published by the Regulator	Regulator website links

## 7. Records available under other legislation

Swoop may create, maintain or retain records in accordance with the following legislation, where applicable. The list is not exhaustive and depends on the nature of Swoop's activities at the relevant time.

Legislation	Examples of related records
Companies Act 71 of 2008	Company registration documents, governance records, resolutions, statutory registers and company records.
Financial Intelligence Centre Act 38 of 2001	Client due diligence, beneficial ownership, risk ratings, transaction records, RMCP records, training records, monitoring records and reporting decision records.
Financial Advisory and Intermediary Services Act 37 of 2002	FSP licence records, key individual and representative records, fit and proper records, compliance records and advice/intermediary service records where applicable.
Financial Sector Regulation Act 9 of 2017	Regulatory correspondence and supervisory records where applicable.
Protection of Personal Information Act 4 of 2013	Information Officer records, privacy notices, data subject requests, operator agreements, security compromise records and processing records.
Promotion of Access to Information Act 2 of 2000	PAIA Manual, PAIA request records, notices, fee records and outcome records.
Electronic Communications and Transactions Act 25 of 2002	Electronic communication, website and transaction records where applicable.
Tax Administration Act 28 of 2011, Income Tax Act 58 of 1962 and VAT Act 89 of 1991	Accounting records, invoices, tax records, VAT records and supporting documents.
Basic Conditions of Employment Act 75 of 1997, Labour Relations Act 66 of 1995, UIF and COIDA legislation	Employment, contractor and payroll records where applicable.
Cybercrimes Act 19 of 2020	Security incident, cybercrime and system evidence records where

Legislation	Examples of related records
	applicable.
SARB exchange control framework	Exchange control advice, authorised dealer or partner confirmations, product assessments and cross-border flow records where applicable.

## 8. Subjects and categories of records held by Swoop

Subject	Categories of records
Corporate and governance	Company registration documents, director and shareholder records, board or executive decisions, delegations of authority, policy approvals and governance minutes.
Regulatory status	FSP licence records, FIC registration evidence, CASP/FSP permissions, regulator correspondence, compliance officer correspondence and external adviser opinions.
AML/CFT and financial crime compliance	RMCP, AML/CFT policies, onboarding procedures, sanctions/PEP/adverse media screening records, client risk ratings, enhanced due diligence, source of funds/source of wealth records, transaction monitoring records and reporting decision records.
Client onboarding and account records	Application forms, KYC/KYB records, beneficial ownership evidence, identity verification results, client declarations, wallet information, bank account details and client communications.
Products and transactions	Product approval records, transaction instructions, confirmations, settlement records, reconciliation records, exception records, failed or delayed transaction records and refund records.
Travel Rule and wallet controls	Originator and beneficiary data where applicable, wallet type records, wallet provider declarations, exception logs, override decisions and supporting evidence.
POPIA and PAIA	Privacy notices, PAIA requests, data subject requests, consent records where applicable, breach/security compromise records, operator records and retention/destruction records.
Service providers and outsourcing	Due diligence, contracts, SLAs, operator agreements, compliance evidence, incident records, vendor reviews and termination records.
Technology and security	System access records, audit logs, security controls, incident logs, backups, architecture records and cybersecurity records.
Finance, tax and accounting	Invoices, tax records, bank statements, management accounts, accounting records, reconciliations and audit records.
Human resources and training	Employment or contractor records, role descriptions, fit and proper evidence, training records, disciplinary records and confidentiality agreements where

Subject	Categories of records
	applicable.
Legal, complaints and disputes	Complaints, dispute correspondence, legal advice, notices, regulator enquiries and litigation records where applicable.

## 9. Processing of personal information under POPIA

### 9.1 Purposes of processing

- client onboarding, identity verification, KYB, beneficial ownership checks and client risk rating;
- delivery of BTC-to-ZAR, ZAR-to-BTC, settlement, education/onboarding and related services;
- AML/CFT/CPF compliance, sanctions screening, PEP screening, adverse media screening and transaction monitoring;
- Travel Rule, wallet, source of funds and source of wealth controls where applicable;
- transaction processing, payment, reconciliation, support, complaints and refunds;
- compliance with regulatory, tax, accounting, audit, legal, risk management and recordkeeping obligations;
- service provider oversight, contract management and information security; and
- protection of Swoop's rights, clients, systems and operations.

### 9.2 Categories of data subjects and personal information

Data subject category	Personal information that may be processed
Prospective clients and clients	Name, identity/passport details, date of birth, address, contact details, nationality, tax or residency indicators where applicable, KYC evidence, declarations, financial details, bank account details, wallet information, transaction history, source of funds/source of wealth information, risk rating and screening results.
Business clients, directors, representatives and beneficial owners	Company registration information, beneficial ownership information, director/representative identity and authority evidence, contact details, business address, ownership/control information, bank details, onboarding evidence, screening results and transaction records.
Payment beneficiaries or nominated payees	Name, bank account details, payment reference and other limited information required to process or reconcile payments where a client has loaded or nominated a beneficiary.
Service providers and operators	Company information, contact details, representative information, contractual records, bank details, tax information, due diligence evidence, security evidence and compliance records.
Employees, contractors, representatives and applicants	Identity, contact, employment, qualification, fit and proper, training, payroll, tax, disciplinary, performance and access control records where applicable.
Website users and correspondents	Contact details, messages, device or usage information, cookie-related information and communication records where applicable.
Complainants, regulators and third parties	Identity/contact details, complaint or enquiry information, correspondence, evidence supplied and outcome records.

### 9.3 Recipients or categories of recipients

Information category	Recipient or recipient category
Identity, KYC/KYB and beneficial ownership information	KYC/KYB providers, screening providers, compliance reviewers, banks, payment providers, regulators and professional advisers where lawful and necessary.
Transaction, wallet and settlement information	Liquidity, exchange, settlement, payment, banking, wallet, Travel Rule, blockchain analytics and reconciliation providers involved in the relevant product flow.
Screening and monitoring information	Screening, monitoring, compliance, audit, legal and regulatory recipients where required for risk management or legal compliance.
Financial and accounting information	Accountants, auditors, tax advisers, banks, payment providers and regulators where applicable.
Technology and support information	Cloud, hosting, email, storage, IT, security, support and document management providers.
Legal, complaint and regulatory information	External compliance consultants, legal advisers, auditors, regulators, ombuds, courts, law enforcement or other competent authorities where lawful or required.

### 9.4 Cross-border processing

Swoop may process or transfer personal information outside South Africa where this is necessary for cloud hosting, technology support, screening, compliance tools, crypto asset infrastructure, settlement services, professional advice or other lawful business purposes. Where cross-border processing occurs, Swoop will take reasonable steps to use appropriate contractual, technical and organisational safeguards and will consider POPIA requirements for cross-border transfers.

### 9.5 Information security measures

Control area	General safeguards
Access control	Role-based access, need-to-know access, password controls, multi-factor authentication where available and periodic access reviews.
Confidentiality	Confidentiality obligations for personnel, contractors and service providers handling personal information.
Provider oversight	Due diligence, contract review, operator agreement review, SLA review and incident escalation where applicable.
Data storage and retention	Controlled storage locations, recordkeeping rules, retention review and deletion/destruction processes where legally permitted.
Monitoring and incident response	Operational monitoring, incident registers, escalation to responsible persons and security compromise response procedures.
Training and governance	Compliance training, policy acknowledgement, management reporting and periodic review of POPIA and PAIA controls.

## 10. PAIA request procedure

A requester must use the prescribed PAIA Form 2 when requesting access to a record of Swoop. The request must provide enough detail to identify the requester, the record requested, the form of access requested, the right that the requester seeks to exercise or protect, and why the record is required for that right.

1. Complete PAIA Form 2, available from the Information Regulator at <https://inforegulator.org.za/paia-forms/>.
2. Attach proof of identity. If acting for another person or entity, attach proof of authority.
3. Send the completed form and supporting documents to [admin@myswoop.co.za](mailto:admin@myswoop.co.za) with the subject line 'PAIA Request - Swoop Financial Solutions'.
4. Swoop may ask for further particulars, proof of authority, payment of a prescribed fee or clarification before processing the request.
5. The Information Officer will consider the request under PAIA, POPIA and any other applicable law.
6. Swoop will notify the requester of the outcome, any access fee payable, the form of access granted or the reasons for refusal where access is refused.

### Response timing

The Information Officer must respond as soon as reasonably possible and generally within 30 days after receiving a valid request. The response period may be extended once for a further period of not more than 30 days where PAIA permits an extension.

### 10.1 POPIA access, correction, deletion and objection requests

A data subject may also ask Swoop to confirm whether Swoop holds personal information about them, request access to that information, object to certain processing, or request correction, deletion or destruction of personal information where permitted by POPIA. Official POPIA forms are available from the Regulator at <https://inforegulator.org.za/popia-forms/>.

## 11. Fees

PAIA allows prescribed request, access, reproduction, search, preparation and transfer fees to be charged in certain circumstances. The latest official fee schedule published by the Information Regulator or applicable regulations will prevail if it differs from the summary below.

Fee item	Amount or basis
Request fee payable by every requester	R140.00
Photocopy or printed black and white copy of an A4 page	R2.00 per page or part thereof
Printed copy of an A4 page	R2.00 per page or part thereof
Copy in computer-readable form on flash drive or compact disc	R40.00 if the requester provides the medium; R60.00 if Swoop provides the compact disc
Transcription of visual images	Outsourced service; amount depends on quotation
Transcription of an audio record	R24.00 per A4 page
Search and preparation time	R145.00 per hour or part hour, excluding the first hour, up to the prescribed maximum of R435.00
Deposit if search exceeds six hours	One third of the calculated access fee

Fee item	Amount or basis
Postage, email or other electronic transfer	Actual expense, if any

A requester may indicate in the prescribed form if they believe they are exempt from paying any fee. Swoop will consider any fee exemption request under the applicable PAIA framework.

## 12. Grounds for refusal and third-party records

Swoop may refuse access to a record where PAIA requires or permits refusal. Examples of grounds that may apply include:

- unreasonable disclosure of the personal information of a third party who is a natural person;
- commercial information of Swoop or a third party, including trade secrets, confidential business information or information that may prejudice commercial interests;
- records supplied in confidence by a third party;
- records privileged from production in legal proceedings;
- records whose disclosure could reasonably be expected to endanger the safety of a person or security of property;
- records relating to research where disclosure would expose Swoop, a third party or the research subject to serious disadvantage;
- requests that are not made in the prescribed form, lack sufficient particulars, or do not identify the right to be exercised or protected; and
- records that Swoop does not hold, cannot locate after a reasonable search, or is not legally authorised to disclose.

If a request relates to a record containing third-party information, Swoop may need to notify the third party and consider any representations before deciding whether access may be granted.

## 13. Remedies available to requesters

Swoop is a private body. PAIA does not provide an internal appeal process against Swoop's decision as a private body. A requester or affected third party who is not satisfied with a decision, non-response, fee decision, extension or form of access may consider the remedies available under PAIA.

Remedy	How it may be used
Complaint to the Information Regulator	A complaint may be submitted to the Regulator, including by using PAIA Form 5 where applicable. See <a href="https://inforegulator.org.za/complaints/">https://inforegulator.org.za/complaints/</a>
Application to court	A requester or third party may apply to a competent court for appropriate relief where PAIA permits this.
Regulator assistance	The Regulator may provide guidance and reasonable assistance to requesters and data subjects.

## 14. Availability and updating of this manual

- available on Swoop's website at <https://myswoop.co.za>;
- available from Swoop's Information Officer upon request;
- available to the Information Regulator upon request; and
- reviewed at least annually or sooner if Swoop's products, legal obligations, contact details, processing activities or record categories materially change.

A reasonable prescribed fee may be payable for hard copies, reproduction or transfer of the manual where permitted by PAIA.

## 15. Annexure guidance and official forms

The official forms are maintained by the Information Regulator and may be updated from time to time. Swoop should use the latest official version of each form when processing requests.

Reference	Form	Purpose
Annexure A	PAIA Form 2: Request for Access to Record	Used by a requester to request access to Swoop records.
Annexure B	PAIA Form 3: Outcome of Request and Fees Payable	Used to communicate the outcome of a request and fees payable where applicable.
Annexure C	PAIA Form 5: Complaint Form	Used where a requester or third party wishes to complain to the Information Regulator.
Annexure D	POPIA Form 1: Objection to Processing	Used by a data subject to object to certain processing of personal information.
Annexure E	POPIA Form 2: Correction, Deletion or Destruction Request	Used by a data subject to request correction, deletion or destruction where permitted.
Annexure F	Security Compromise Notification Form and Guidance	Used by responsible parties where POPIA security compromise notification is required.

Current PAIA forms: <https://info regulator.org.za/paia-forms/>

Current POPIA forms: <https://info regulator.org.za/popia-forms/>

Information Regulator complaints: <https://info regulator.org.za/complaints/>

### Issued by

Role	Name	Date
Information Officer	Divan Myburgh	1 June 2026