

PAIA Manual

ToGGeL (Pty) Ltd | TapVent event services

Last reviewed 15 October 2026

Application to TapVent

TapVent is an event-services platform of ToGGeL (Pty) Ltd and is not a separate legal entity. This document applies to ToGGeL when delivering TapVent services. References to ToGGeL identify the legal entity; references to TapVent identify the event platform. TapAPI is a separate legal entity providing integrated wallet functionality where enabled.

TapVent-specific application: TapVent is a service operated by ToGGeL (Pty) Ltd, not a separate public or private body. Requests concerning TapVent records are handled through ToGGeL's designated PAIA process.

Application of this manual to TapVent records

This is ToGGeL (Pty) Ltd's PAIA manual, including records generated through its TapVent event-services platform. TapVent is not a separate private body and does not require a separate PAIA manual. Relevant record categories may include event agreements, supplier records, ticketing or registration configurations, access-control logs, support correspondence and event reports, subject to applicable access restrictions.

TapAPI is a separate company and its own records are not automatically records held by ToGGeL.

Wallet records: where an event used TapAPI wallet bands, the records of wallets, balances, transactions and identity checks are held by TAPAPI (Pty) Ltd, not ToGGeL. Request them under TapAPI's PAIA Manual (tapapi.co.za/legal/paia-manual.php) from its Information Officer at io@tapapi.co.za. ToGGeL holds only its own event records: the event's band codes, recorded when the bands are encoded, and the sales totals per event and per till that TapAPI reports to it; these can be requested under this manual.

Existing corporate provisions (apply insofar as relevant to TapVent services)

Prepared in terms of section 51 of the Promotion of Access to Information Act 2 of 2000 (as amended)

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1. LIST OF ACRONYMS AND ABBREVIATIONS

- 1.1 "CEO" - Chief Executive Officer;
- 1.2 "DIO" - Deputy Information Officer;
- 1.3 "IO" - Information Officer;
- 1.4 "Minister" - the Minister responsible for PAIA, as applicable;
- 1.5 "PAIA" - Promotion of Access to Information Act 2 of 2000, as amended;
- 1.6 "POPIA" - Protection of Personal Information Act 4 of 2013;
- 1.7 "Regulator" - Information Regulator (South Africa); and
- 1.8 "Republic" - Republic of South Africa.

2. PURPOSE OF PAIA MANUAL

This Manual assists members of the public to understand the records held by ToGGeL (Pty) Ltd and the process for requesting access to records in terms of PAIA. It also provides the information required by section 51 of PAIA, read with POPIA.

- 2.1 identify categories of records that may be available without a formal PAIA request;
- 2.2 understand how to request access to a record and the subjects and categories of records held by ToGGeL;
- 2.3 identify records available in accordance with other legislation;
- 2.4 obtain the contact details of the Information Officer and Deputy Information Officer;
- 2.5 understand the Regulator's Guide on how to use PAIA and how to obtain it;

- 2.6 understand the purposes for which ToGGeL processes personal information and the categories of data subjects and information concerned;
- 2.7 understand recipients or categories of recipients to whom personal information may be supplied;
- 2.8 understand whether personal information may be transferred or processed outside South Africa; and
- 2.9 understand the general security safeguards used to protect personal information.

3. KEY CONTACT DETAILS FOR ACCESS TO INFORMATION OF TOGGEL (PTY) LTD

3.1 Information Officer

Name: Charles Matthews (registered Information Officer)
Tel: 082 568 6002
Email: info@toggel.co.za

3.2 Deputy Information Officer

Deputy Information Officer: to be designated or confirmed by ToGGeL
Email: info@toggel.co.za

3.3 Access to information general contact

Email: info@toggel.co.za

3.4 Principal place of business

Postal address: 4 Augrabies Street, Mooikloof Ridge, Pretoria
Physical address: 4 Augrabies Street, Mooikloof Ridge, Pretoria
Pretoria 0084
Email: info@toggel.co.za
Website: www.toggel.co.za

4. GUIDE ON HOW TO USE PAIA AND HOW TO OBTAIN ACCESS TO THE GUIDE

- 4.1 The Information Regulator has made available a Guide on how to use PAIA, as amended. The Guide explains how a person may exercise rights contemplated in PAIA and POPIA.
- 4.2 The Guide is available in the official languages published by the Regulator and may be obtained from the Information Regulator's website or upon request from the Regulator.
- 4.3 The Guide includes information on the objects of PAIA and POPIA, Information Officer contact details, prescribed forms, applicable fees, available remedies and procedures for requesting access to records.
- 4.4 A request for access to a record of a public or private body is made using Form 2 (Request for Access to Record), prescribed under Regulation 7. The request must be submitted to the relevant Information Officer or Deputy Information Officer with sufficient detail to identify the requested record.

4.5 The current Guide, prescribed forms and information on complaints are available from the Information Regulator.

Information Regulator contact details:

Website: inforegulator.org.za

General enquiries: enquiries@inforegulator.org.za

Telephone: 010 023 5200

Toll-free: 0800 017 160

Address: Woodmead North Office Park, 54 Maxwell Drive, Woodmead, Johannesburg, 2191

4.6 A requester may lodge a complaint with the Information Regulator where permitted by PAIA after giving the relevant body an opportunity to respond. The Regulator publishes the applicable complaint form and procedures.

5. CATEGORIES OF RECORDS OF TOGGE (PTY) LTD AVAILABLE WITHOUT A FORMAL PAIA REQUEST

Category of records	Type of record	Website	On request
Corporate compliance document		X	X
Public brochures, product information and publications	Public / informational	X	X
Website content and published notices	Public / informational	X	X

6. RECORDS AVAILABLE IN ACCORDANCE WITH OTHER LEGISLATION

ToGGeL may hold records required to be created, retained or made available under applicable South African legislation. The legislation applicable to a particular record depends on the nature of the record and ToGGeL's activities.

Category of records	Applicable legislation (where relevant)
Company and corporate records	Companies Act 71 of 2008
PAIA and access-to-information records	Promotion of Access to Information Act 2 of 2000
Personal information and privacy records	Protection of Personal Information Act 4 of 2013
Employment and personnel records	Basic Conditions of Employment Act 75 of 1997; Employment Equity Act 55 of 1998, where applicable
Tax, accounting and financial records	Income Tax Act 58 of 1962; Tax Administration Act 28 of 2011; Value-Added Tax Act 89 of 1991, where applicable

Category of records	Applicable legislation (where relevant)
Electronic records and transactions	Electronic Communications and Transactions Act 25 of 2002, where applicable

7. SUBJECTS AND CATEGORIES OF RECORDS HELD BY TOGGE (PTY) LTD

Subject	Categories of records
Corporate governance	Memorandum of Incorporation, company records, policies, resolutions and governance records
Strategy and operations	Business plans, proposals, operational procedures, project records and management reports
Human resources	Employment records, contracts, policies, leave, payroll, training and performance records
Finance and tax	Accounting records, invoices, banking records, tax records, budgets and financial statements
Customers and users	Customer/client records, service records, support records, agreements, communications and transaction-related records where applicable
Suppliers and service providers	Supplier records, contracts, due-diligence records, invoices and correspondence
Technology and information security	System documentation, architecture, access-control records, logs, security policies, incident records, backup and recovery records
Intellectual property	Trade marks, software, designs, specifications, source-code related records, licences and proprietary documentation
Legal and compliance	Contracts, NDAs, regulatory records, PAIA/POPIA records, complaints and legal correspondence
Marketing and communications	Website content, marketing materials, media releases, campaigns and public communications

Access to a record is not automatic merely because it falls within a category above. A request remains subject to PAIA, including applicable grounds for refusal and the protection of third-party, confidential, commercial and personal information.

8. PROCESSING OF PERSONAL INFORMATION

8.1 Purpose of processing personal information

ToGGeL processes personal information only where there is a lawful and legitimate purpose. Depending on the relationship and service involved, purposes may include customer and user onboarding; service delivery; account and identity administration; payments and transaction support; customer support; access control

and security; contractual administration; supplier management; employment and payroll; legal and regulatory compliance; fraud prevention; audit; system security; business administration; and communications.

8.2 Categories of data subjects and personal information

Data subjects	Personal information that may be processed
Customers, clients and authorised representatives	Names, contact details, identity or registration details where required, account/service information, transaction and payment-related information, correspondence and support records
End users of ToGGeL-enabled services	Identity and contact information where required for the service, identifiers, access or usage records, transaction-related information and other information necessary to provide the relevant service
Employees, applicants and contractors	Contact and identity information, employment records, qualifications, payroll/banking details, tax information, performance/training information and other employment-related information
Suppliers and service providers	Names, contact details, registration and VAT information, banking details, contracts, due-diligence information and correspondence
Website visitors and business contacts	Contact information, enquiry details and technical/usage information where collected

8.3 Recipients or categories of recipients

Personal information may be supplied, where lawful and necessary, to:

- banks, payment service providers and other authorised financial-service providers;
- hosting, cloud, communications, cybersecurity and technology service providers;
- professional advisers, auditors, insurers and other contracted service providers;
- regulators, law-enforcement agencies, courts or public authorities where required or permitted by law;
- customers, business partners or other parties where necessary to deliver an authorised service and subject to appropriate safeguards.

8.4 Planned transborder flows of personal information

ToGGeL may use technology, hosting, communications or other service providers that process or store personal information outside South Africa. Any cross-border transfer will be managed in accordance with section 72 of POPIA and applicable contractual, legal and security safeguards. The countries and service providers involved may change as ToGGeL's systems and business operations evolve.

8.5 General description of information security measures

ToGGeL maintains appropriate and reasonable technical and organisational safeguards designed to protect the confidentiality, integrity and availability of personal information. These measures are risk-based and may include:

- access controls, least-privilege permissions and multi-factor authentication where appropriate;

- encryption of data in transit and at rest where appropriate;
- secure hosting and infrastructure controls;
- endpoint protection, patching and vulnerability management;
- logging, monitoring and incident-response procedures;
- backup, recovery and disaster-recovery controls;
- security requirements for service providers and authorised third parties;
- staff confidentiality, security awareness and acceptable-use requirements; and
- retention and secure destruction controls.

Further detail is maintained in ToGGel's internal security, data protection, retention, access-control and disaster-recovery policies.

9. AVAILABILITY OF THE MANUAL

9.1 A copy of this Manual is available:

9.1.1 on ToGGel's website at www.toggel.co.za;

9.1.2 at ToGGel's principal place of business for public inspection during normal business hours, subject to reasonable access and security arrangements;

9.1.3 to any person upon request. Electronic copies will be provided where reasonably practicable. Any fee for a physical copy will be dealt with in accordance with PAIA and the applicable Regulations; and

9.1.4 to the Information Regulator upon request or through the Regulator's eServices facilities where applicable.

10. UPDATING OF THE MANUAL

The Information Officer of ToGGel (Pty) Ltd will review and update this Manual when material information changes and otherwise on a regular basis to keep it accurate and aligned with applicable PAIA and POPIA requirements.

Issued by

Sandra Rezin

Managing Director (authorised signatory); Information Officer: Charles Matthews

REQUESTS FOR ACCESS TO RECORDS - PRACTICAL PROCESS

A person requesting access to a ToGGel record under PAIA should use the current prescribed Form 2: Request for Access to Record and submit it to the Information Officer or Deputy Information Officer using the contact details in section 3.

The requester should provide sufficient detail to identify the record, indicate the preferred form of access, explain the right sought to be exercised or protected where PAIA requires this, and provide proof of identity and authority where the request is made on behalf of another person.

ToGGeL will process requests in accordance with PAIA, including applicable time periods, fees, third-party notification requirements, grounds for refusal, severability and remedies.

Current PAIA forms and guidance are available from the Information Regulator at info regulator.org.za.

DOCUMENT CONTROL

Item	Detail
Document	
Prepared under	Section 51 of the Promotion of Access to Information Act 2 of 2000, as amended
Current update	January 2026
Owner	Information Officer
Review trigger	Material legal, organisational, contact, processing or security changes; otherwise regular review

REVISION HISTORY

Date	Responsible	Summary of change
01 October 2024	ToGGeL	Manual compiled.
January 2026	Information Officer	Reviewed and updated for 2026; contact terminology corrected; PAIA guidance and request process refreshed; records, personal-information processing, cross-border processing and security descriptions updated.
15 October 2026	ToGGeL	Wallet events aligned with TapAPI's Terms of Use v1.1 and Privacy Policy v1.4 (TAPAPI (Pty) Ltd is the wallet provider). Revision history set out as a table.

NOTE

This Manual describes ToGGeL's PAIA and related POPIA information at a general level. It does not create a right of access beyond that provided by law, and it does not require ToGGeL to disclose records that may lawfully be refused or protected under PAIA, POPIA or other applicable law.