PAIA MANUAL

DaL Holdings (Pty) Ltd

Prepared in terms of section 51 of the Promotion of Access to Information Act 2 of 2000

DRAFT FOR REVIEW — 9 OCTOBER 2026

1. Purpose of this Manual

This manual is prepared in terms of section 51 of the Promotion of Access to Information Act 2 of 2000 (PAIA), as amended, and should be read together with the Protection of Personal Information Act 4 of 2013 (POPIA). It explains the categories of records held by DaL Holdings (Pty) Ltd and how a person may request access. Access remains subject to PAIA procedures, grounds for refusal and protection of confidential and personal information.

2. Particulars of the Private Body

Name: DaL Holdings (Pty) Ltd
Company registration number: 2004/004149/07
Nature of business: Credit provider offering loans to qualifying employees within employer groups with which the company has an arrangement.
NCR registration number: NCRCP424
Physical address: Tijgervalley Office Park, 76 Unit 2, Silver Lakes Road, Pretoria, 0054, South Africa
Website: https://dal-holdings.co.za
General enquiries: customercare@dalholdings.co.za
Telephone: 0861 325 626
Head of the private body: Chief Executive Officer or duly authorised representative.
Information Officer: Susan Hanekom
Information Officer email: susanh@dalholdings.co.za

3. Guide on how to use PAIA

The Information Regulator publishes a guide explaining how to exercise rights under PAIA and POPIA. The guide and further information are available at https://inforegulator.org.za. The applicable guide and prescribed forms should be checked on the Regulator’s website when making a request.

4. Records available without a formal PAIA request

The company may make the following records available on request without a formal PAIA application, where appropriate and subject to confidentiality and applicable law:
• General company and contact information published on the public website.
• Public-facing product and service information.
• This PAIA Manual, the Privacy Notice and Website Terms of Use.
• General information about the company’s NCR registration.
This does not mean confidential customer, credit or personal records are automatically available.

5. Records available in terms of other legislation

Records may be held in terms of legislation applicable to the company, including, where relevant: the Companies Act 71 of 2008; National Credit Act 34 of 2005; POPIA; Financial Intelligence Centre Act 38 of 2001; Tax Administration Act 28 of 2011; Income Tax Act 58 of 1962; Value-Added Tax Act 89 of 1991; Basic Conditions of Employment Act 75 of 1997; Labour Relations Act 66 of 1995; and applicable accounting and regulatory requirements. Access depends on the relevant law and the nature of the request.

6. Subjects and categories of records held

The company may hold records in these categories:
• Corporate and governance: incorporation, statutory registers, management records, policies and administration.
• Regulatory and compliance: NCR registration and reporting, compliance records, audits and regulatory correspondence.
• Credit and lending: applications, quotations, credit agreements, affordability assessments, credit bureau information, payment records, statements, collections and customer communications.
• Customer and employer relationships: employer arrangements, payroll deduction instructions and correspondence.
• Finance and tax: accounting records, invoices, bank records, financial statements and tax records.
• Suppliers: contracts, due diligence, invoices and correspondence.
• Human resources: employment, payroll and personnel records.
• IT and security: access controls, system records, security incidents, backups and technical administration.

• Legal and disputes: contracts, complaints, legal correspondence and litigation records.
• Website and enquiries: messages and contact details voluntarily submitted through available channels.
The public website is informational and marketing-focused and does not itself process loan applications or conclude credit agreements. Applications and loan servicing are handled through designated digital channels and systems.

7. Requesting access to records

A requester should use the prescribed PAIA request form applicable to a private body (currently Form 2, where applicable). The request should identify the record sought, provide sufficient detail to locate it, state the right the requester wishes to exercise or protect, and indicate the preferred form of access. Proof of identity or authority may be requested where appropriate.
Send requests to susanh@dalholdings.co.za with the subject “PAIA Request”, or deliver them to the company’s physical address. The Information Officer will process the request under PAIA and its regulations. Prescribed request and access fees may apply. Access may be refused or limited on grounds provided for in PAIA, including protection of third-party personal information, confidential information and privileged records.

8. Categories of data subjects and personal information

Data subjects may include applicants and borrowers, employees, representatives of employer clients, suppliers, service providers, business contacts, complainants and website enquirers. Personal information may include identification and contact details, employment and salary information, financial and credit information, loan and payment history, communications, contractual information, employment records and supplier or business contact details.

9. Purposes of processing and recipients

Personal information may be processed for credit applications and affordability assessment, entering into and administering credit agreements, payment and payroll deduction administration, collections, customer service, regulatory compliance, fraud prevention, accounting and tax, dispute resolution, employment administration, supplier management, information security and responding to enquiries.
Where lawful and necessary, information may be disclosed to employers for agreed payroll administration; credit bureaux; payment, banking and collection providers; technology and loan-management providers; professional advisers and auditors; regulators and public authorities; courts; and other recipients authorised by law or by the relevant person. Information is subject to applicable legal duties and safeguards.

10. Cross-border transfers and information security

Cross-border processing arrangements should be confirmed with the company’s technology and service providers before publication. Where personal information is transferred outside South Africa, the company will do so subject to applicable POPIA requirements. The company uses administrative, technical and organisational safeguards intended to protect personal information against loss, unauthorised access, disclosure, alteration or destruction. Security-sensitive details are not set out in this public manual.

11. Availability and updates

This manual is intended to be available free of charge on the company’s public website at https://dal-holdings.co.za and on request from susanh@dalholdings.co.za. A paper copy may be requested; any applicable prescribed fee will be communicated in advance. The company will review this manual periodically and update it when material changes occur.

12. Information Regulator

Information Regulator (South Africa)
Website: https://inforegulator.org.za
Current contact details and PAIA/POPIA complaint channels are published on the Regulator’s website. Requesters should consult that website for the latest details and procedures.

13. Approval

Compiled for DaL Holdings (Pty) Ltd.
Information Officer: Susan Hanekom
Email: susanh@dalholdings.co.za
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This document is a working draft and must be reviewed and confirmed by the company before publication.