

Promotion of Access to Information Act (PAIA) Manual

Enziglo (Pty) Ltd t/a SportyBet South Africa

Prepared in accordance with Section 51 of the Promotion of Access to Information Act, 2000 (PAIA) Version 1.0- December 2025

1. INTRODUCTION

This PAIA Manual is published in terms of Section 51 of the Promotion of Access to Information Act 2 of 2000 ("PAIA"). The purpose of this Manual is to assist individuals in understanding the structure of Enziglo (Pty) Ltd t/a SportyBet South Africa ("SportyBet"), the types of records we hold, and the process for requesting access to such records.

This Manual also includes the requirements introduced by the Protection of Personal Information Act, 2013 ("POPIA"), including details on the categories of personal information processed by SportyBet, data subject rights, and how such rights may be exercised.

2. CONTACT DETAILS OF THE INFORMATION OFFICER

Information Officer: Deyna Joseph

Email: Deyna.joseph@sporty.com

Business Address: 1st Floor, Samora Machel Drive, Promenade Mall, Nelspruit, Mpumalanga

Deputy Information Officers: Appointed as required and published on request.

3. GUIDE ON HOW TO USE PAIA (SECTION 10 GUIDE)

A guide on how to exercise your rights under PAIA is compiled by the Information Regulator, in terms of Section 10 of the Act. It explains various topics, such as a guide on how a PAIA request can be made, it explains the grounds for access or refusal and it describes the fees associated with access requests.

A copy of this guide can be obtained from the Information Regulator website;
<https://inforegulator.org.za/paia/>

4. CATEGORIES OF RECORDS HELD BY SPORTYBET

SportyBet holds the following categories of records that may be requested in terms of PAIA, subject to lawful grounds for access and protection of confidential or personal information:

4.1 Companies Act Records

- Incorporation documents
- Register of directors
- Minutes of board meetings
- Share register

4.2 Financial Records

- Annual financial statements
- Tax records
- Bank records
- Invoices, receipts, purchase orders

4.3 Human Resources Records

- Employee contracts
- Disciplinary records
- Leave records
- Payroll information

4.4 Customer and Operational Records

- Customer account information
- KYC / FICA verification data
- Responsible gambling and self-exclusion records
- Transaction logs and betting history
- Customer service communications
- System logs

4.5 Legal and Compliance Records

- Licences issued by MER
- Policies and procedures (AML, POPIA, Responsible Gambling)
- Internal audit reports

4.6 Marketing and Communication Records

- Promotional communications
- Consent records

4.7 Information Available Without a PAIA Request

- SportyBet website information
- Terms and Conditions

- Privacy Policy
- PAIA Manual

5. CATEGORIES OF PERSONAL INFORMATION PROCESSED (AS REQUIRED BY POPIA)

SportyBet processes various categories of personal information including: Identification data (ID number, passport, names), Contact details, financial information for deposits/withdrawals, betting activity, device and usage data, self-exclusion information

Personal information is processed strictly for lawful purposes, including service provision, fraud detection, responsible gambling compliance, and regulatory reporting.

6. PURPOSE OF PROCESSING PERSONAL INFORMATION

SportyBet processes personal information for purposes such as:

- Customer onboarding and KYC verification.
- Account administration.
- FIC Act, MER, and tax compliance.
- Responsible and safer gambling obligations.
- Fraud monitoring and risk management.
- Customer support and dispute resolution.
- Direct marketing (only with appropriate consent).

7. PROCEDURE FOR REQUESTING ACCESS TO RECORDS

Requests for access to information must be submitted in the prescribed Form 2 under PAIA.

7.1 Submission Requirements

Requests must:

- Be made in writing using Form 2.
- Provide sufficient details to identify the record sought.
- Include a copy of the requester's ID document.
- State the right being exercised or protected, as well as the reason(s) why the requested record is needed.

7.2 Submission Channels

Requests may be submitted to:

Email: Deyna.joseph@sporty.com

8. GROUNDS FOR REFUSAL OF ACCESS

SportyBet may refuse access on lawful grounds, including:

- Protection of personal information of third parties.
- Protection of confidential commercial information.
- Records privileged in legal proceedings.
- Security-sensitive records.
- Research information.

Where access is refused, SportyBet will provide a written explanation and outline rights of appeal or review.

9. FEES PAYABLE

PAIA permits SportyBet to charge fees associated with:

- Request processing.
- Photocopying or electronic reproduction.
- Postage or courier.

A requester will be notified of applicable fees before the request is processed.

10. AVAILABILITY OF THIS MANUAL

This PAIA Manual is:

- Published on SportyBet's website.
- Available at SportyBet's registered office.
- Available on request via email

11. UPDATING OF THE MANUAL

This Manual is reviewed annually or when material changes occur in SportyBet's operations or legal obligations.

Approved by:

Board of Directors, Enziglo (Pty) Ltd t/a SportyBet South Africa

Date: 7 December 2025