

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

Reset Direct (Pty) Ltd · Registration number 2017/085300/07 · NCRCP 9773 · RD-MAN-01 version 1.0 · Effective 10 September 2026

## What this manual is for

This manual tells you what records Reset Direct (Pty) Ltd holds, how to ask for access to one, what it costs, and what to do if we refuse.

It is published because section 51 of PAIA requires every private body to have one. It also contains the information that section 51 of the Protection of Personal Information Act requires us to include about how we process personal information.

Nothing in this manual limits your rights. It is a guide to how to exercise them.

## 1. Introduction and purpose

- 1.1 Section 32 of the Constitution gives everyone the right of access to information held by the State, and to information held by another person where that information is required for the exercise or protection of any right.
- 1.2 The Promotion of Access to Information Act 2 of 2000 (PAIA) gives effect to that right and sets out the procedure to be followed. It applies to Reset Direct (Pty) Ltd as a private body.
- 1.3 Section 51 of PAIA requires a private body to compile, publish and maintain a manual describing the body, its records, the procedure for requesting access, and the other matters listed in that section. This is that manual.
- 1.4 The exemption that previously relieved certain private bodies of the obligation to compile a manual lapsed on 31 December 2021. Every private body must now have one.
- 1.5 This manual also carries the information required by section 51(1)(c)(i) to (v) of the Protection of Personal Information Act 4 of 2013 (POPIA), read with the POPIA Regulations as amended with effect from 17 April 2025.
- 1.6 Since 30 June 2021 PAIA has been administered and enforced by the Information Regulator (South Africa), and not by the South African Human Rights Commission.

## 2. Definitions

|                                 |                                                                                                                                                                      |
|---------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>the Company</b>              | Reset Direct (Pty) Ltd, registration number 2017/085300/07, previously registered as Tru Finance (Pty) Ltd                                                           |
| <b>Head of the private body</b> | The chief executive officer or equivalent officer of the Company, or the person duly authorised by that officer, as contemplated in section 1 of PAIA                |
| <b>Information Officer (IO)</b> | The head of the private body, who is the Information Officer for the purposes of POPIA and PAIA                                                                      |
| <b>Personal information</b>     | Information relating to an identifiable, living natural person, or to an identifiable existing juristic person, as defined in POPIA                                  |
| <b>Record</b>                   | Any recorded information in the possession or under the control of the Company, regardless of form or medium, and whether or not it was created by the Company       |
| <b>Regulator</b>                | The Information Regulator (South Africa), established under section 39 of POPIA                                                                                      |
| <b>Requester</b>                | Any person making a request for access to a record of the Company, including a person acting on behalf of another                                                    |
| <b>the Regulations</b>          | The Regulations relating to the Promotion of Access to Information published under Government Notice R.757 in Government Gazette 45057 of 27 August 2021, as amended |

## 3. Particulars of the Company — section 51(1)(a)

|                                                         |                                                                                                                                                                                                          |
|---------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Name of the private body</b>                         | Reset Direct (Pty) Ltd (previously Tru Finance (Pty) Ltd)                                                                                                                                                |
| <b>Registration number</b>                              | 2017/085300/07                                                                                                                                                                                           |
| <b>Nature of business</b>                               | Registered credit provider. The Company provides unsecured credit to salaried employees, principally through consolidation lending, with repayment collected by deduction from salary or by debit order. |
| <b>NCR registration</b>                                 | NCRCP 9773                                                                                                                                                                                               |
| <b>Head of the private body and Information Officer</b> | Chris de Kock                                                                                                                                                                                            |
| <b>Physical address</b>                                 | Block B, Lombardy Corporate Park, Cnr Cole and Graham Roads, Shere AH, Pretoria, Gauteng, 0081                                                                                                           |
| <b>Postal address</b>                                   | PostNet Suite 124, Private Bag X25, Lynnwood Ridge, Pretoria, 0040                                                                                                                                       |
| <b>Telephone</b>                                        | +27 87 138 9984                                                                                                                                                                                          |
| <b>Email for PAIA requests</b>                          | info@resetdirect.co.za                                                                                                                                                                                   |
| <b>Website</b>                                          | www.resetdirect.co.za                                                                                                                                                                                    |

#### 4. The Regulator's Guide on how to use PAIA — section 51(1)(b)

- 4.1 Section 10 of PAIA requires the Information Regulator to compile and update a guide, in each official language, containing the information a person needs in order to exercise a right under PAIA and under POPIA.
- 4.2 The Guide explains, among other things, the objects of PAIA and POPIA, the particulars of the Regulator, how to make a request, the assistance available, the fees payable, and the remedies available where access is refused.
- 4.3 The Guide is available free of charge from the Regulator, at [www.inforegulator.org.za](http://www.inforegulator.org.za), and on request from the Regulator at the contact details in section 13 of this manual. A copy may also be inspected at the Company's head office during ordinary business hours, by arrangement.

#### 5. Records available without a request — sections 51(1)(c) and 52

- 5.1 Section 52 of PAIA allows a private body to publish a notice in the Government Gazette listing categories of records that are automatically available without a formal request. The Company has not published such a notice.
- 5.2 Certain records are nonetheless made freely available and do not require a PAIA request. These include this manual, the Privacy Policy, the Cookie Policy, the Website Terms of Use, the Complaints Policy and Process, product information published on the Company's website, and the documents the National Credit Act entitles a consumer to receive — for example a copy of a credit agreement, a statement of account and a settlement quotation, which may be obtained by contacting us directly.

#### 6. Records available in terms of other legislation — section 51(1)(d)

The Company holds and maintains records under, among others, the following legislation. Access to a record in terms of another Act is dealt with under that Act, and not under PAIA.

| Legislation                                                                                                                                               | Nature of the records                                                                                                                                                                     |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Companies Act 71 of 2008                                                                                                                                  | Memorandum of incorporation, statutory registers, minutes and resolutions, annual financial statements, statutory returns                                                                 |
| National Credit Act 34 of 2005 and its Regulations                                                                                                        | Credit applications, affordability assessments, pre-agreement statements and quotations, credit agreements, statements of account, records of registration, prescribed returns to the NCR |
| Financial Intelligence Centre Act 38 of 2001                                                                                                              | Customer due diligence and verification records, risk management and compliance programme, transaction records, reports to the Financial Intelligence Centre, training records            |
| Protection of Personal Information Act 4 of 2013                                                                                                          | Personal information processing records, consents, security compromise records, this manual                                                                                               |
| Promotion of Access to Information Act 2 of 2000                                                                                                          | This manual, PAIA requests and decisions, annual PAIA reports to the Regulator                                                                                                            |
| Consumer Protection Act 68 of 2008                                                                                                                        | Marketing records, direct marketing opt-out records, complaint records                                                                                                                    |
| Income Tax Act 58 of 1962; Tax Administration Act 28 of 2011; Value-Added Tax Act 89 of 1991                                                              | Tax returns and assessments, PAYE, VAT and employees' tax records, supporting documents                                                                                                   |
| Basic Conditions of Employment Act 75 of 1997; Labour Relations Act 66 of 1995                                                                            | Employment contracts, payroll and time records, disciplinary and grievance records, employment policies                                                                                   |
| Employment Equity Act 55 of 1998; Skills Development Act 97 of 1998; Skills Development Levies Act 9 of 1999                                              | Employment equity plans and reports, workplace skills plans, training reports                                                                                                             |
| Compensation for Occupational Injuries and Diseases Act 130 of 1993; Unemployment Insurance Act 63 of 2001; Occupational Health and Safety Act 85 of 1993 | Injury on duty records, UIF declarations and contributions, health and safety records                                                                                                     |
| Electronic Communications and Transactions Act 25 of 2002                                                                                                 | Data messages, electronic records and website disclosures                                                                                                                                 |

## 7. Subjects and categories of records held — section 51(1)(e)

The Company holds records in the following subjects and categories. Listing a record here does not mean that access to it will be granted; every request is considered against the grounds for refusal in Chapter 4 of PAIA.

| Subject                            | Categories of records                                                                                                                                                                                                                                                            |
|------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Company secretarial and governance | Memorandum of incorporation, statutory registers, board and committee minutes, resolutions, delegations of authority, licences and registrations                                                                                                                                 |
| Financial                          | Annual financial statements, management accounts, budgets, ledgers, bank statements, tax records, audit reports, funding and treasury records                                                                                                                                    |
| Client and credit                  | Applications, identity and supporting documents, affordability assessments, credit bureau reports, pre-agreement statements and quotations, credit agreements, mandates, settlement letters, statements of account, payment and arrears records, call recordings, correspondence |
| Insurance                          | Credit life policy records, schedules, claims correspondence, policy substitution records                                                                                                                                                                                        |
| Collections and legal              | Arrears and recovery records, section 129 notices, letters of demand, court process, debt review correspondence, settlement agreements                                                                                                                                           |
| Compliance and risk                | Compliance monitoring and risk management plans, FIC Act risk management and compliance programme, regulatory correspondence and returns, complaint records, incident and breach registers                                                                                       |
| Marketing                          | Marketing material, campaign records, consent and opt-out records, direct marketing suppression lists                                                                                                                                                                            |
| Human resources                    | Employment contracts and personnel files, payroll records, leave and attendance, disciplinary and grievance records, training and assessment records, employment equity records                                                                                                  |
| Information technology             | System documentation, access control and user records, security policies, back-up and disaster recovery records, service provider agreements                                                                                                                                     |
| Suppliers and service providers    | Contracts, service level agreements, operator agreements, purchase orders, invoices, due diligence                                                                                                                                                                               |

|                         |                                                                        |
|-------------------------|------------------------------------------------------------------------|
|                         | records                                                                |
| Property and facilities | Lease agreements, insurance policies, maintenance and security records |

## 8. Processing of personal information — section 51(1)(c) of POPIA

### 8.1 Purpose of processing

The Company processes personal information in order to: respond to enquiries; verify identity and perform customer due diligence under the FIC Act; assess affordability and creditworthiness under the National Credit Act; conclude and administer credit agreements; arrange credit life insurance where elected; collect instalments and recover arrears; report to credit bureaux; handle complaints; perform internal audit, accounting, risk management and reporting; comply with legal and regulatory obligations; administer employment; manage supplier relationships; and, where consent has been given or the existing customer exception applies, conduct direct marketing.

### 8.2 Categories of data subjects and the information relating to them

| Data subjects                                              | Categories of personal information                                                                                                                                                                                                                                                                                                                          |
|------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Applicants and clients                                     | Identifying information, contact and address details, demographic details, employment and payroll details, income and expenses, bank account details and statements, credit bureau information, existing credit obligations and settlement figures, payment history, health information where credit life cover is elected, call recordings, correspondence |
| Spouses, guarantors and next of kin                        | Identifying information, contact details, and where applicable financial information                                                                                                                                                                                                                                                                        |
| Employees and job applicants                               | Identifying and contact information, qualifications and employment history, remuneration and banking details, tax and statutory numbers, leave, disciplinary and performance records                                                                                                                                                                        |
| Suppliers and service providers, and their representatives | Company and contact details, banking details, identifying information of representatives, due diligence records                                                                                                                                                                                                                                             |
| Website visitors                                           | IP address, device and browser information, usage information, cookie identifiers                                                                                                                                                                                                                                                                           |

### 8.3 Recipients to whom personal information may be supplied

Companies within the Reset group, including Reset Solutions (Pty) Ltd and Reset Solutions OC (Pty) Ltd trading as Reset Operations Centre; operators appointed in writing, including the loan administration platform, hosting and IT providers, call recording and document storage providers, collections agents and mailing houses; registered credit bureaux; employers and payroll administrators for the purpose of salary deductions; banks and payment providers; insurers and insurance administrators; other credit providers, for settlement purposes; debt counsellors and payment distribution agents; attorneys, auditors and compliance advisers; regulators, ombud schemes and law enforcement agencies; and a purchaser or successor in the event of a transfer of business.

### 8.4 Cross-border transfers

Personal information may be transferred to or accessed from outside the Republic of South Africa where a service provider hosts or supports a system used by the Company. Such transfers are made only where section 72 of POPIA is satisfied — principally where the recipient is bound by a law, binding corporate rules or a binding agreement providing an adequate level of protection substantially similar to POPIA, or where the transfer is necessary for the performance of a contract with the data subject.

### 8.5 Description of information security measures

The measures the Company takes to secure the integrity and confidentiality of personal information under section 19 of POPIA include: role-based access controls and least-privilege permissions; multi-factor authentication for remote and privileged access; encryption of data in transit and of data at rest where appropriate; firewalls, endpoint protection and network monitoring; secure hosting and controlled physical access to premises and records; secure back-up and tested restoration procedures; written operator agreements imposing equivalent obligations on service providers; vetting of staff and signed confidentiality undertakings; periodic awareness training; logging and review of access to client records; and a documented process for identifying, containing and reporting security compromises. Security compromises are notified to the Information Regulator through its eServices portal, as has been mandatory since 1 April 2025, and to affected data subjects, in terms of section 22 of POPIA.

## 9. How to request access to a record

### 9.1 The prescribed form

- 9.1.1** A request must be made on a form that corresponds substantially with Form 2 of the Regulations. Form 2 may be downloaded from [www.infoforegulator.org.za](http://www.infoforegulator.org.za) or obtained from the Company on request.
- 9.1.2** The completed form, together with proof of payment of the request fee, must be delivered to the Information Officer at the physical, postal or email address in section 3 of this manual.

## 9.2 What the request must contain

- sufficient particulars to enable the Information Officer to identify the record and to identify you as the requester;
- the form of access required;
- your postal address, email address or fax number in the Republic;
- an identification of the right you seek to exercise or protect, and an explanation of why the record is required in order to exercise or protect that right — this is a requirement of section 50(1)(a) of PAIA and a request that does not deal with it will be refused;
- if you wish to be informed of the decision in any manner in addition to writing, the manner and the necessary particulars; and
- if the request is made on behalf of another person, proof of the capacity in which you are making it, to the satisfaction of the Information Officer.

## 9.3 Assistance

If you cannot read or write, or have a disability, you may make your request orally to the Information Officer, who will reduce it to writing on Form 2 and give you a copy.

## 9.4 Our decision

- 9.4.1** The Information Officer will decide the request and notify you in writing within 30 days of receiving it.
- 9.4.2** That period may be extended once, by a further period of not more than 30 days, where the request is for a large number of records, or where the records are not held at the office where the request was received, or in the other circumstances set out in section 57 of PAIA. We will tell you in writing if we extend.
- 9.4.3** If the record contains information about a third party, section 71 of PAIA requires us to take reasonable steps to inform that third party and to give them an opportunity to make representations before we decide.
- 9.4.4** If access is granted, we will tell you the access fee payable, the form in which access will be given, and that you may lodge an application with a court against the fee or the form of access.

## 10. Fees

- 10.1** Two fees may be payable. The first is a request fee, payable by every requester before the request is processed. The second is an access fee, payable where access is granted, which covers the cost of searching for, preparing and reproducing the record.
- 10.2** No request fee is payable where the request is a request for access to your own personal information.
- 10.3** Where the Company estimates that the search and preparation will exceed six hours, a deposit of one third of the access fee is payable before the request is processed.
- 10.4** The fees below are those prescribed for a private body. Payment must be made into the Company's nominated bank account; details are available from the Information Officer on request.

| Item | Description                                                                                                                                                                       | Amount                                                                           |
|------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------|
| 1    | Request fee, payable by every requester                                                                                                                                           | R140.00                                                                          |
| 2    | Photocopy or printed black and white copy, for every A4 page or part of a page                                                                                                    | R2.00                                                                            |
| 3    | Printed copy of an A4-size page or part of a page                                                                                                                                 | R2.00                                                                            |
| 4    | Copy in a computer-readable form on a flash drive provided by the requester<br>Copy on a compact disc provided by the requester<br>Copy on a compact disc provided by the Company | R40.00<br>R40.00<br>R60.00                                                       |
| 5    | Transcription of visual images, for an A4-size page or part of a page                                                                                                             | Outsourced — the fee depends on the quotation obtained from the service provider |
| 6    | Copy of visual images                                                                                                                                                             | Outsourced — the fee depends on the quotation obtained from the service provider |
| 7    | Transcription of an audio record, per A4-size page                                                                                                                                | R24.00                                                                           |
| 8    | Copy of an audio record on a flash drive provided by the requester<br>Copy on a compact disc provided by the requester<br>Copy on a compact disc provided by the Company          | R40.00<br>R40.00<br>R60.00                                                       |
| 9    | For each hour or part of an hour, excluding the first hour, reasonably required to search for and prepare the record for disclosure<br><br>Maximum search and preparation fee     | R145.00<br>R435.00                                                               |
| 10   | Deposit, where the search is estimated to exceed six hours                                                                                                                        | One third of the amount payable per request, calculated in terms of items 2 to 8 |
| 11   | Postage, email or other electronic transfer                                                                                                                                       | Actual expense, if any                                                           |

The fee schedule above reflects the private body fees published by the Information Regulator and current at the date of this manual. Where the prescribed fees are amended, the amended fees apply and this manual will be updated.

## 11. Grounds on which access may be refused

The Company may, and in some cases must, refuse a request on the grounds set out in Chapter 4 of PAIA. They are, in summary:

- **Section 63** — mandatory protection of the privacy of a third party who is a natural person, including a deceased person, where disclosure would be unreasonable.
- **Section 64** — mandatory protection of the commercial information of a third party, including trade secrets, and financial, commercial, scientific or technical information the disclosure of which would be likely to cause harm to that party's commercial or financial interests.
- **Section 65** — mandatory protection of certain confidential information of a third party, where disclosure would constitute an actionable breach of a duty of confidence.
- **Section 66** — mandatory protection of the safety of individuals and the protection of property.
- **Section 67** — mandatory protection of records privileged from production in legal proceedings.
- **Section 68** — protection of the commercial activities of the Company, including trade secrets, information the disclosure of which would harm its commercial or financial interests, and information which could put it at a disadvantage in negotiations or commercial competition.
- **Section 69** — protection of research information of the Company or a third party, where disclosure would expose the researcher or the subject matter to serious disadvantage.
- **Section 70** — the mandatory disclosure override in the public interest, which requires disclosure notwithstanding the grounds above where the record reveals a substantial contravention of the law or an imminent and serious public safety or environmental risk, and the public interest in disclosure clearly outweighs the harm.

Where only part of a record may be refused, section 28 of PAIA requires us to grant access to the remainder of the record.

## 12. If your request is refused

**12.1** PAIA does not provide for an internal appeal against a decision of a private body. Your remedies are as follows.

**12.2 Complaint to the Information Regulator.** You may lodge a complaint with the Regulator in terms of section 77A of PAIA. The complaint must be made on a form that corresponds substantially with Form 5 of the Regulations, and must be lodged within 180 days of the

decision or of the failure to respond. The Regulator's policy is to defer or reject a complaint where the requester has not first given the body the opportunity to respond, so please complete Form 2 and submit it to us before you approach the Regulator.

**12.3 Application to court.** You may apply to a court for appropriate relief in terms of sections 78 and 82 of PAIA, within 180 days of being notified of the decision, or of the expiry of the period within which we should have decided.

**12.4** A failure to respond within the applicable period is deemed to be a refusal of the request, in terms of section 58 of PAIA.

### 13. The Information Regulator

|                                             |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
|---------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Information Regulator (South Africa)</b> | Woodmead North Office Park, 54 Maxwell Drive, Woodmead, Johannesburg, 2191<br>Tel: 010 023 5200   Toll free: 0800 017 160<br>General enquiries: <a href="mailto:enquiries@inforegulator.org.za">enquiries@inforegulator.org.za</a><br>PAIA complaints: <a href="mailto:PAIAComplaints@inforegulator.org.za">PAIAComplaints@inforegulator.org.za</a><br>POPIA complaints: <a href="mailto:POPIAComplaints@inforegulator.org.za">POPIAComplaints@inforegulator.org.za</a><br>eServices portal: <a href="https://eservices.inforegulator.org.za">eservices.inforegulator.org.za</a><br><a href="http://www.inforegulator.org.za">www.inforegulator.org.za</a> |
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### 14. Availability of this manual — section 51(3)

This manual is available:

- on the Company's website at [www.resetdirect.co.za](http://www.resetdirect.co.za);
- for inspection at the Company's head office during ordinary business hours, free of charge, by arrangement with the Information Officer;
- on request to the Information Officer, at the fee prescribed for reproduction; and
- to the Information Regulator, on request.

It is available in English. If you require assistance in another official language, please contact the Information Officer and we will make reasonable arrangements.

### 15. Reporting and review

**15.1** Section 83(4) of PAIA requires the Company to submit an annual report to the Information Regulator recording the number of requests received, granted, refused and the grounds of refusal. The report is submitted through the Regulator's eServices portal.

**15.2** This manual is reviewed at least annually, and whenever there is a material change to the Company's structure, records, contact details, Information Officer or the applicable law.

| Version | Date              | Prepared by           | Summary of change                                                                                                                                                                                                                                                                                                |
|---------|-------------------|-----------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1.0     | 10 September 2026 | Compliance Department | First issue for Reset Direct (Pty) Ltd, replacing the manual previously maintained under the name Tru Finance (Pty) Ltd. Updated for the current PAIA Regulations and private body fee schedule, the amended POPIA Regulations effective 17 April 2025, and the Information Regulator's current contact details. |