



VALR GROUP PAIA MANUAL

Document Classification	External
Version Number	V2
Document Owner	Compliance
Approval Date	7 April 2026
Document Review Lifecycle	Annually

VALR GROUP PAIA MANUAL	1
1. Introduction	3
2. Purpose of this PAIA Manual	3
3. VALR Group entities covered	4
4. VALR Group Information Officer contact details	5
5. Guide on how to use PAIA and how to obtain access to the guide	5
6. Categories of records available without a person having to request access	6
7. Records that are available in terms of other legislation	7
8. Description of the categories of data subjects and of the information or categories of information relating thereto	8
9. Processing of personal information	9
10. Availability of the PAIA Manual	9
11. Prescribed fees and forms	9
12. Grounds for refusal of a request	10
13. Request Procedure	11
14. Access to records	12
15. Remedies available in the event of refusal	12
16. Updating the Manual	12

1. Introduction

1.1 This Manual has been prepared in terms of the Promotion of Access to Information Act 2 of 2000 (“PAIA”). PAIA gives effect to section 32 of the Constitution of the Republic of South Africa, 1996, which provides that everyone has the right of access to:

- any information held by the State; and
- any information held by another person that is required for the exercise or protection of any rights.

1.2 PAIA places a duty on a private body to make available information that has been requested in accordance with PAIA, subject to any applicable grounds for refusal.

1.3 This Manual constitutes a consolidated Group PAIA Manual adopted by the private bodies listed in Section 2 of this Manual (collectively referred to as the “VALR Group”).

1.4 Each entity within the VALR Group is a separate juristic person and private body as defined in PAIA. This consolidated Manual is adopted by each such entity in order to satisfy the requirements of PAIA, while providing a unified and streamlined framework for access to information across the Group.

1.5 Nothing in this Manual must be interpreted as limiting the separate legal status of each entity within the VALR Group. Where records are entity-specific, access requests will be processed by or on behalf of the relevant legal entity in accordance with PAIA.

1.6 This Manual does not create any rights beyond those conferred by PAIA and does not automatically entitle a requester to access any particular record. Access to records will be granted or refused in accordance with the provisions of PAIA.

2. Purpose of this PAIA Manual

2.1 This Manual sets out the process to be followed when requesting access to information held by the VALR Group, in accordance with PAIA.

2.2 This Manual sets out the categories of records held by the VALR Group and the availability of such records.

2.3 This Manual provides the relevant contact details, prescribed access form and applicable fees. It also sets out the decision making process, the grounds for refusal of a request, and the remedies available in the event of refusal.

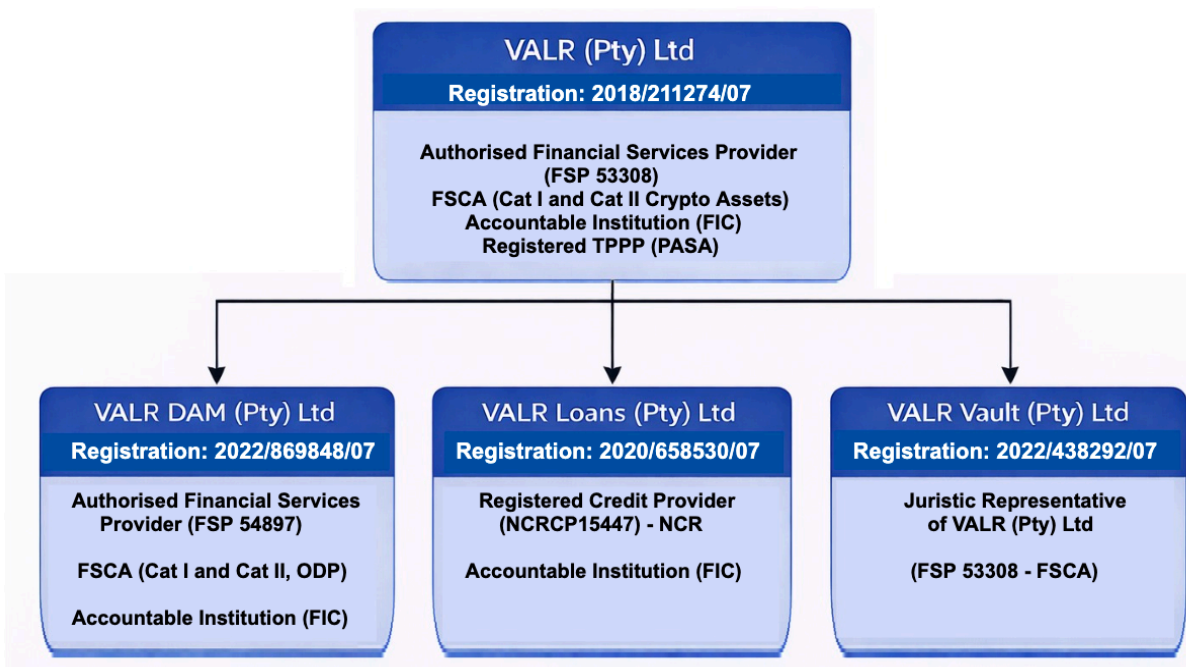
2.4 This PAIA Manual is useful for the public to:

- Determine whether the VALR Group holds records relevant to the exercise or protection of a right;
- Understand how to submit a request for access to such records;

- Identify whether certain records are automatically available without the need to submit a formal PAIA request;
- Access all the relevant contact details of the Information Officer and Deputy who will assist the public with the records they intend to access;
- Understand the categories of records held by the VALR Group and the legal framework governing access to such records.

3. VALR Group entities covered

This PAIA Manual applies to the following Group Entities:



3.1 For purposes of convenience, the entities listed above are collectively referred to in this Manual as the “VALR Group”. The use of the term “VALR Group” does not create a separate legal entity and does not derogate from the separate juristic personality of each company listed above.

3.2 Where a request for access to information relates to records held by a specific entity within the VALR Group, such request will be processed by or on behalf of the relevant legal entity in accordance with PAIA.

3.3 Certain governance, operational, compliance, risk management, legal, financial, technology and administrative functions are performed centrally across the VALR Group. As a result, records may be stored, managed or administered through centralised systems or shared service arrangements.

3.4 Notwithstanding any shared services arrangements, each entity remains legally responsible for records held by or on its behalf in accordance with PAIA and applicable legislation.

4. VALR Group Information Officer contact details

4.1 The Information Officer acts on behalf of each of the VALR Group entities listed in this Manual. Where a request relates to a specific legal entity within the VALR Group, the request will be processed by or on behalf of that entity in accordance with PAIA.

4.2 The contact details below apply to all entities forming part of the VALR Group unless otherwise stated. The Chief Executive Officer of the VALR Group, has delegated the responsibility for administration of and compliance with PAIA, to the Information Officer:

Contact Information	Details
Company Name	VALR
Postal/Physical Address	9th Floor, The Atrium, 5th Street, Sandton, Gauteng, South Africa
Information Officer	Name: Mr Greshen Naidoo Contact: 083 416 2474 Email: Compliance@valr.com
Website	http://www.valr.com

5. Guide on how to use PAIA and how to obtain access to the guide

5.1 The Information Regulator of South Africa, in terms of section 10(1) of PAIA has compiled a [guide](#) containing information required by a person who wishes to exercise any right contemplated in the Act. The guide explains, among other matters the:

- objectives of PAIA;
- manner and form of a request for access to a record;
- assistance available to requesters;
- assistance available from the Information Regulator in terms of PAIA and POPIA;
- remedies available in the event of refusal;
- role of the Information Regulator;
- procedure for lodging a complaint with the Information Regulator.
- notices issued in terms of sections 22 and 54 regarding fees to be paid in relation to requests for access;
- regulations made in terms of section 92 of PAIA; and
- remedies in law available regarding an act or failure to act in respect of a right or duty conferred or imposed by PAIA and POPIA, including the manner of lodging:
 - an internal appeal;
 - a complaint to the Information Regulator; and

- an application to a court against a decision by the Information Officer of a public body, a decision on internal appeal, a decision by the Information Regulator, or a decision by the head of a private body.

5.2 Members of the public may inspect or make copies of the Guide from the offices of the public and private bodies, including the office of the Information Regulator, during normal working hours.

5.3 The Guide may also be obtained from the website of the Information Regulator. Any queries relating to the Guide should be directed to the Information Regulator.

5.4 A copy of the Guide may also be made available from the offices of the VALR Group during normal office hours, as well as on the VALR Group’s website, where applicable.

5.5 Enquiries regarding the PAIA [guide](#) should be directed to:

Regulator	The Information Regulator of South Africa
Physical Address	Woodmead North Office Park, 54 Maxwell Drive, Woodmead, Johannesburg
Email Address	enquiries@inforegulator.org.za
Telephone Number	(010) 023 5200
Website	https://inforegulator.org.za/

6. Categories of records available without a person having to request access

6.1 The VALR Group makes certain records available to the public through its official website, including its [Help Centre](#) portal, which may include, but are not limited to:

Category of Records	Types of Records Available
Public Website Information	General platform information and usage guides
Public Product Information	General Information on Sign-up, deposits/withdrawals, trading, leveraged/margin, futures, OTC, tokenised stocks
Public Corporate Records	Licences, authorisations and registrations
Terms of Service	Standard Terms of Service; Margin, Futures, OTC, Tokenised Stocks Terms
Privacy Policy	Data protection and privacy information
Complaints and Dispute Resolution Procedures	Complaints Management Policy
Regulatory Disclosures and Licensing Information	FAIS Statutory Disclosure; licensing notices

Glossary and Educational Resources	Cryptocurrency Glossary; Trading/Platform guides
Legal/Statutory Notices	General Law Enforcement Requests guidance
Announcements and Media	General Public announcements and notices
Other Information Published Online	FAQs; platform features; account support; social media links

6.2 The publication of information on the VALR Group website or through other public platforms does not constitute:

- a waiver of any rights under PAIA;
- a formal notice in terms of section 52(2); or
- an undertaking that all records held by the VALR Group are automatically available.

7. Records that are available in terms of other legislation

7.1 The VALR Group maintains certain records in terms of legislation other than PAIA. Access to such records may be subject to the provisions and limitations of the relevant legislation and does not automatically entitle a requester to access such records under PAIA. This includes, but is not limited to, the following:

Subject	Legislation	Category of Record
Customer Information	<ul style="list-style-type: none"> • Financial Advisory and Intermediary Services Act 37 of 2002 • Financial Intelligence Centre Act No 38 of 2001 • Financial Sector Regulation Act 9 of 2017 • Protection of Personal Information Act 4 of 2013 • Promotion of Access to Information Act 2 of 2000 • Prevention and Combating of Corrupt Activities Act No 12 of 2004 • National Credit Act 34 of 2005 	<ul style="list-style-type: none"> • Natural Person Information • Juristic Person Information • Transactional Information • Trading Activity • Customer Communication • FAIS Disclosure Records • Credit Related Records • Customer Due Diligence Records • KYC Records
Corporate Governance	<ul style="list-style-type: none"> • Companies Act 71 of 2008 • Consumer Protection Act 68 of 2008 • Broad Based Black Economic Empowerment Act No 53 of 2003 • Electronic Communications Act No 36 of 2005 	<ul style="list-style-type: none"> • Memorandum of Incorporation • Company Registration Documents • License Information • Statutory Registers • Shareholder Resolutions • Annual Financial Statements • Governance Policies • Contracts and Agreements • Company Rules

Subject	Legislation	Category of Record
Tax and Finance	<ul style="list-style-type: none"> Income Tax Act 58 of 1962 Value Added Tax Act No 89 of 1991 Currency and Exchanges Act 9 of 1933 	<ul style="list-style-type: none"> Accounting Records Tax Records Audit Reports Statutory Returns
Human Resources	<ul style="list-style-type: none"> Labour Relations Act 66 of 1995 Basic Conditions of Employment Act 75 of 1997 Employment Equity Act 55 of 1998 Unemployment Insurance Act 63 of 2001 	<ul style="list-style-type: none"> Employment Contracts Employee Records Leave Records Disciplinary Records Payroll Information Employment Equity Records Training Records Medical Aid Records

7.2 The above list is not exhaustive and may be updated from time to time as regulatory requirements evolve.

8. Description of the categories of data subjects and of the information or categories of information relating thereto

8.1 This section specifies the categories of data subjects in respect of whom the VALR Group processes personal information and the nature or categories of the personal information being processed.

8.2 The inclusion of any category of data subject or information in this section should not be taken as an indication that access to such records will automatically be granted under PAIA, as lawful grounds for refusal may apply. Access may be refused where lawful grounds for refusal apply.

Category of Data Subject	Description	Personal Information Processed
Customers / Clients	Natural persons or juristic entities who use the VALR Group's products or services, including trading, derivatives, custody and credit services.	Identification information; contact details; financial information; transaction history; wallet addresses; trading records; KYC and AML verification data; communications; complaints records.
Institutional Clients	Corporate, institutional or clients using advanced trading, derivatives or custody services.	Corporate registration details; beneficial ownership information; transactional records.
Suppliers / Service Providers	Natural persons or juristic entities providing goods or services to the VALR Group.	Identification details; company registration details; contractual records; banking and payment details; correspondence.

Category of Data Subject	Description	Personal Information Processed
Employees and Personnel	Directors, employees, contractors, and consultants.	Identity and contact information; employment contracts; remuneration records; performance records; tax information; internal correspondence.
Regulatory and Law Enforcement Authorities	Regulatory bodies and authorities engaging with the VALR Group in terms of applicable legislation.	Correspondence; compliance reports; investigation related records (subject to statutory confidentiality).
Financial Records	Financial information relating to customers, institutional clients, suppliers, employees, or other persons whose financial data is processed by the VALR Group in the course of its business operations.	Banking details; payment records; transaction records; account balances; invoice information; tax-related information; credit and affordability information; source of funds information and financial correspondence

9. Processing of personal information

9.1 The VALR Group is committed to safeguarding your Personal Information through robust organizational, physical, and technical measures that comply with applicable data protection laws. In accordance with our [privacy policy](#), our goal is to ensure the confidentiality, integrity, and availability of all Personal Information entrusted to us.

9.2 The VALR Group may transfer or process personal information outside the Republic of South Africa where this is necessary for its business operations, the provision of services, the use of cloud-based systems, or engagement with third-party service providers. In addition to this, the VALR Group uses Google Cloud based infrastructure which is hosted in the United Kingdom.

9.3 Where personal information is transferred outside South Africa, the VALR Group will ensure that appropriate security safeguards, contractual protections and data protection measures are in place in accordance with applicable law.

10. Availability of the PAIA Manual

10.1 This Manual is available:

- for inspection, free of charge, on the VALR Group’s official website and at the registered office of the VALR Group during normal business hours, by prior appointment;
- to any person upon request, subject to payment of the prescribed reproduction fee, if applicable; and
- to the Information Regulator, upon request, in accordance with PAIA

10.2 A fee for a copy of this Manual, as contemplated in the applicable PAIA Regulations, may be payable per A4 size photocopy.

10.3 This Manual is also submitted to and made available to the Information Regulator in accordance with the requirements of PAIA.

11. Prescribed fees and forms

11.1 All fees are determined in accordance with the PAIA Regulations, 2021, as amended from time to time. A requester (other than a personal requester seeking access to their own personal information) may be required to pay the prescribed request fee before the request is processed.

11.2 Where the search, preparation or reproduction of a record will exceed the prescribed time, the Information Officer may require payment of a prescribed deposit toward the access fee before continuing to process the request.

11.3 If access is granted, the requester must pay the prescribed access fee for:

- reproduction of the record;
- search for and preparation of the record; and
- time reasonably required in excess of the prescribed hours.

11.4 The VALR Group may withhold release of the record until all applicable fees or deposits have been paid. If a deposit has been paid and the request is refused, the deposit will be refunded.

12. Grounds for refusal of a request

12.1 PAIA recognises that the right of access to information may be limited to the extent that such limitation is reasonable and justifiable in an open and democratic society based on human dignity, equality and freedom. The VALR Group may therefore refuse a request for access to records in circumstances contemplated in Chapter 4 of PAIA.

12.2 Access must be refused where:

- Disclosure would involve the unreasonable disclosure of personal information relating to a third party who is a natural person, whether living or deceased;
- Disclosure would constitute a breach of a duty of confidence owed to a third party in terms of an agreement or applicable law;
- The record is privileged from production in legal proceedings, including legally privileged communications between the VALR Group and its legal advisors;
- Disclosure could reasonably be expected to endanger the life or physical safety of an individual or prejudice the security of property, systems, digital infrastructure or operational environments;
- The record contains research information of the VALR Group or a third party, and disclosure could reasonably be expected to result in serious disadvantage to the researcher or the subject matter of the research.

12.3 Access may be refused where the record contains:

- Trade secrets of a third party or of the VALR Group;
- Financial, commercial, scientific or technical information of a third party or of the VALR Group, the disclosure of which would be likely to cause harm to the commercial or financial interests of that party;
- Information supplied in confidence by a third party, the disclosure of which could reasonably be expected to place that third party at a disadvantage in contractual or other negotiations or to prejudice that third party in commercial competition;
- Information, the disclosure of which could reasonably be expected to place the VALR Group at a disadvantage in contractual or other negotiations or to prejudice the VALR Group in commercial competition;
- Computer programs owned by the VALR Group and protected under the Copyright Act 98 of 1978, including proprietary trading systems, algorithms, source code and related documentation.

12.4 The VALR Group may also refuse a request which is manifestly frivolous or vexatious, or where compliance with the request would involve a substantial and unreasonable diversion of resources.

12.5 Where a record contains information that may lawfully be disclosed together with information that is subject to a ground of refusal, the Information Officer will consider whether access may be granted to the remainder of the record with the protected information redacted.

13. Request Procedure

13.1 A requester seeking access to a record held by the VALR Group must submit the [Request for Access to Record](#) form to the Information Officer using the contact details provided in section 4 of this Manual and pay the required access request fee.

13.2 The requester must provide sufficient detail on the prescribed form to enable the Information Officer to identify:

- the record/s requested;
- the identity of the requester;
- the form of access required, if the request is granted;
- the postal address, fax number or email address of the requester;
- the right to be exercised or protected in accordance with section 50 of PAIA;
- sufficient explanation as to why the requested record is required to exercise or protect that right.

13.3 Failure to adequately establish the section 50 threshold may result in refusal of the request. The Information Officer will notify the requester in writing of the decision to grant or refuse access within 30 (thirty) days of receipt of the request.

13.4 Where a request is made on behalf of another person, the requester must provide proof of the capacity in which the request is made, to the reasonable satisfaction of the Information Officer.

13.5 Where a request is made for access to personal information relating to a third party other than the requester, the VALR Group will notify the third party and afford them an opportunity to consent to the disclosure in accordance with PAIA. The requested information will only be released if the third party provides written consent to the disclosure. If consent is refused and no lawful basis for disclosure exists, the request will be refused.

13.6 The Information Officer will provide written notice of the decision. If the request is refused, the notice will include:

- Adequate reasons for refusal; and
- Information regarding the remedies available to the requester under PAIA.

13.7 The said 30 (thirty) day period may be extended for a further period not exceeding 30 (thirty) days if the request is for a large number of records, or the request requires a search for information which cannot reasonably be obtained within the original 30 (thirty) day period. The requester will be notified in writing of any extension and the reasons for such extension.

13.8 If a requester is unable to complete the prescribed form due to illiteracy, disability or any other reasonable cause, the requester may make an oral request to the Information Officer, who will reduce the request to writing and provide a copy thereof to the requester.

14. Access to records

14.1 The inclusion of a record in this Manual does not automatically entitle a requester to access such record. Each request will be considered on a case-by-case basis in accordance with PAIA.

14.2 In terms of section 50 of PAIA, a requester will only be granted access to a record held by the VALR Group if:

- the requester satisfies the requirements of section 50 of PAIA;
- the prescribed procedures have been properly followed; and
- no lawful ground of refusal under Chapter 4 of PAIA applies.

15. Remedies available in the event of refusal

15.1 The VALR Group is a private body for the purposes of PAIA and does not provide for an internal appeal procedure in respect of decisions taken by a private body.

15.2 A requester or third party who is dissatisfied with a decision of the VALR Group in relation to a request for access to a record may lodge a complaint with the Information Regulator in accordance with PAIA using the prescribed complaint [Form 5](#).

15.3 A requester or third party who is dissatisfied with the decision of the VALR Group may apply to a competent court for appropriate relief in terms of PAIA. Such applications must be made within the time periods prescribed in PAIA.

16. Updating the Manual

16.1 The VALR Group reserves the right to amend, update or revise this Manual from time to time. Any updated version of this Manual will be published on the VALR Group's website and will take effect from the date of publication.