

PAIA Manual

Prepared in accordance with section 51 of the Promotion of Access to Information Act 2 of 2000, as amended (“PAIA”), read with the Protection of Personal Information Act 4 of 2013 (“POPIA”).

1. Contact details of the private body

ITEM	DETAIL
Registered name	Nile Commerce (Pty) Ltd
Registration number	2022/770381/07
Head of the body and Information Officer	Joy Des Fountain
Email	legal@onnile.shop
Website	https://www.onnile.shop

2. The Regulator's guide on how to use PAIA

The Information Regulator (South Africa) has published a guide, in terms of section 10 of PAIA, on how to exercise the rights conferred by the Act. It is available in all official languages at inforegulator.org.za, or on request from the Information Regulator at JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001.

3. Records available without a request

The following are published on our website and may be accessed without submitting a PAIA request:

- This PAIA Manual
- Privacy Policy
- Terms and Conditions

4. Categories of records held

The subjects on which Nile holds records, and the categories of record held on each, are:

SUBJECT	CATEGORIES OF RECORD
Company and governance	Founding documents, statutory registers, board and shareholder records
Financial	Accounting records, tax records, banking records, invoices
Employment	Employee records, payroll, policies
Commercial	Agreements with brands, creators, suppliers and service providers
Operational	Services and system records, including brand account and configuration records
Marketing	Marketing materials, campaign records and enquiry records

The listing of a category above does not mean that a record within it will be released. Access is subject to the grounds for refusal in Chapter 4 of PAIA, including the mandatory protection of the personal information of third parties and of confidential commercial information.

5. Records processed on behalf of a brand

Where a shopper interacts with a brand's Sales Assistant, the brand is the responsible party for that personal information and Nile processes it as an operator on the brand's documented instructions.

A request for access to those records should therefore be directed to the relevant brand. Where a request is made to Nile, we will refer the requester to the brand and, subject to our agreement with that brand, assist the brand in responding.

6. How to request access

A request for access to a record must:

- be made in writing on Form 2 of the Regulations Relating to the Promotion of Access to Information, 2021
- be addressed to the Information Officer at legal@onnile.shop

- provide sufficient particulars to enable us to identify the record and the requester
- identify the right that the requester seeks to exercise or protect, and explain why the record is required to exercise or protect that right
- state the form of access required, and the postal address or electronic address of the requester

Where a request is made on behalf of another person, proof of the capacity in which the requester is making the request must be attached.

7. Decision and timeframes

We will decide on a request within thirty days of receipt and notify the requester of the decision in writing. That period may be extended in the circumstances set out in section 57 of PAIA, and the requester will be notified if it is. Where access is refused, we will give reasons and explain the requester's right to lodge a complaint with the Information Regulator or to apply to court.

8. Fees

A request fee and, where applicable, an access fee are payable in accordance with the fee schedule prescribed under PAIA. We will notify the requester of any fee payable before processing the request, and may withhold the record until the fee is paid.

9. Processing of personal information under POPIA

ITEM	DETAIL
Purpose of processing	Providing and administering the Services, enabling a brand to receive and fulfil orders placed in its own WhatsApp channel, managing brand and supplier relationships, employment administration, marketing to those who have consented, and compliance with legal obligations
Categories of data subject	Shoppers, brand and Studio users, creators, suppliers, employees and job applicants
Categories of personal information	Contact details, order and transaction records, chat records, account and usage data, employment records

Recipients	Brands, payment processors, WhatsApp and Meta, Shopify, cloud hosting, artificial intelligence and analytics providers, and professional advisers
Cross-border transfers	Certain service providers process information outside South Africa. Transfers are made in accordance with section 72 of POPIA
Security measures	Encryption, access controls, staff confidentiality undertakings and written agreements with operators

Data subjects have the rights described in our Privacy Policy, including the rights of access, correction, deletion, export and objection, and the right to lodge a complaint with the Information Regulator.

10. Complaints to the Information Regulator

- Address: JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001
 - Email: complaints.IR@justice.gov.za or POPIAComplaints@inforegulator.org.za
 - Website: inforegulator.org.za
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11. Availability of this manual

This manual is available on our website at onnile.shop under Legal. A copy may be requested by emailing legal@onnile.shop.
