

PAIA and POPIA Manual

AI Inside (Pty) Ltd

Registration number: 2026/410708/07

Prepared in terms of section 51 of the Promotion of Access to Information Act 2 of 2000 (PAIA) and section 17 of PAIA read with section 56 of the Protection of Personal Information Act 4 of 2013 (POPIA)

Version 1.0 · Date of compilation: October 2026 · Next review: October 2027

1. Purpose of this manual

PAIA gives effect to the constitutional right of access to information held by another person that is required for the exercise or protection of any rights (section 32 of the Constitution). This manual helps anyone who wants to request access to records held by AI Inside (Pty) Ltd. It explains:

- which categories of records we hold;
- which records are available without a formal request;
- how to submit a request and what it costs;
- on what grounds a request may be refused;
- how we process personal information, as required by POPIA;
- which remedies are available if a request is refused.

This manual applies only to records held by AI Inside (Pty) Ltd. It does not apply to records held by any other organisation, including clients, service providers or cooperation partners.

2. Company and contact details

Item	Details
Name	AI Inside (Pty) Ltd
Registration number	2026/410708/07
Head of the private body	Daniela Purps, Director
Information Officer	Daniela Purps
Deputy Information Officer	Daniela Purps
Physical address	No 61 Ferero Avenue, Randpark Ridge, Randburg, Gauteng, 2156 – as registered with CIPC
Postal address	[as above]
Telephone	+49 176 56504856
Email (Information Officer)	daniela@ai-inside.co.za
Website	ai-inside.co.za

3. Guide on how to use PAIA

The Information Regulator has published a revised Guide on how to use PAIA and POPIA under section 10 of PAIA. It explains, among other things, how to request access to records and which remedies are available. The Guide is available on the Regulator's website at infoeregulator.org.za/paia-guidelines. Members of the public can inspect a copy at our offices during normal business hours.

Information Regulator (South Africa)	Details
Physical address	Woodmead North Office Park, 54 Maxwell Drive, Woodmead, Johannesburg, 2191
Postal address	P.O. Box 31533, Braamfontein, Johannesburg, 2017
Telephone	010 023 5200 · toll-free 0800 017 160
General enquiries	enquiries@infoeregulator.org.za
PAIA complaints	PAIAComplaints@infoeregulator.org.za
POPIA complaints	POPIAComplaints@infoeregulator.org.za
Website	infoeregulator.org.za

4. Records available without a request

The following records are available without a formal request under PAIA (section 52):

- information published on our website, including our Legal Notice, Privacy Policy and Terms of Use;
- marketing and programme information, such as brochures and descriptions of our services;
- this manual.

No notice under section 52(2) has been published for AI Inside (Pty) Ltd.

5. Records held in terms of other legislation

We keep records in accordance with the following legislation, where it applies to us:

- Companies Act 71 of 2008
- Income Tax Act 58 of 1962
- Tax Administration Act 28 of 2011
- Occupational Health and Safety Act 85 of 1993
- Electronic Communications and Transactions Act 25 of 2002
- Copyright Act 98 of 1978
- Promotion of Access to Information Act 2 of 2000
- Protection of Personal Information Act 4 of 2013

This list is not exhaustive. A record held under any of these Acts is accessible only as provided for by that Act or by PAIA.

6. Subjects and categories of records held

Subject	Categories of records
Company records	Memorandum of Incorporation, CIPC registration documents, director records, resolutions and minutes
Financial and tax records	Financial statements, accounting records, invoices, bank statements, tax returns and correspondence with SARS
Client records	Proposals, contracts, purchase orders, correspondence, project documentation and deliverables
Training and learning records	Participant lists, attendance records, survey responses, assessment results, completion certificates and learning platform usage data
Service provider records	Supplier contracts, operator agreements, invoices and correspondence
Marketing and communication records	Enquiries, contact form submissions, newsletter subscriptions and event or webinar registrations
IT and security records	Access logs, system configuration records, security incident records and backup records
Intellectual property	Training materials, course content, frameworks, templates and copyright records
Data protection records	Records of processing, consent records, POPIA requests and responses, security compromise records

Whether access is granted to a record in this list depends on the grounds for refusal in section 10.

7. Processing of personal information (POPIA)

7.1 Purposes of processing

We process personal information to:

- deliver keynotes, training, webinars, learning programmes and the AI READY 360° programme;
- issue certificates and keep records of completed training on behalf of our clients;
- conduct pre- and post-training surveys and analyse them for our clients;
- respond to enquiries and manage client relationships;
- send information about our services where the recipient has agreed or the law permits it;
- manage contracts with clients and service providers;
- meet legal, tax and accounting obligations;
- operate and secure our websites and systems;

7.2 Categories of data subjects and personal information

Data subjects	Personal information
Client contact persons	Name, job title, organisation, work email, telephone number, correspondence
Training participants	Name, work email, organisation, department, role, attendance, survey responses, assessment results, certificates, learning platform usage

Data subjects	Personal information
Website visitors and enquirers	Name, email, organisation, enquiry content, technical data such as IP address and cookie data (see our Privacy Policy)
Newsletter subscribers and event attendees	Name, email, organisation, consent records, registration details
Service providers	Contact person details, banking details, contract information
Employees, contractors and applicants [if applicable – otherwise delete row]	Identity details, contact details, qualifications, banking and tax details, employment records

We do not intentionally collect special personal information (for example health information or biometric data) or personal information of children. Where survey responses could contain such information, we ask participants not to include it.

7.3 Recipients

We may share personal information with:

- clients who commission training: attendance records and certificates of their own staff by name, and survey results in aggregated form only;
- operators who process personal information on our behalf, such as providers of hosting, email, video conferencing, scheduling, learning platform and form services
- independent trainers or cooperation partners who co-deliver a programme, where this is necessary for that programme and the client has been informed
- professional advisers, such as accountants, auditors and lawyers;
- public authorities, where the law requires it (for example SARS or the Information Regulator).

We do not sell personal information.

7.4 Planned transborder flows of personal information

We work with clients in South Africa and in the European Union. Some of our service providers store data outside South Africa. Personal information may therefore be transferred to or processed in:

- Germany and other EU member states, in connection with clients and training participants based in the EU;

We transfer personal information outside South Africa only where section 72 of POPIA allows it, for example where the recipient is subject to laws, binding corporate rules or a binding agreement that provide adequate protection, or where the transfer is necessary to perform a contract.

Our German-language website is directed at organisations in Germany. Where we process personal information of individuals in the European Union, the EU General Data Protection Regulation (GDPR) may apply in addition to POPIA. Details are set out in our Privacy Policy and our German Datenschutzerklärung.

7.5 Security measures

We take appropriate and reasonable technical and organisational measures to protect personal information, as required by section 19 of POPIA. These include:

- access to personal information only for people who need it for their work;
- multi-factor authentication for business accounts;
- encryption of data in transit and, where available, at rest;
- written agreements with operators that require them to protect personal information (section 21 of POPIA);
- confidentiality obligations for staff and contractors;
- regular backups;
- a procedure for detecting, recording and reporting security compromises to the Information Regulator and affected data subjects (section 22 of POPIA);
- regular review of these measures.

7.6 Rights of data subjects

Data subjects may ask us to confirm, free of charge, whether we hold personal information about them, and may request access to it (section 23 of POPIA). They may also request correction or deletion (section 24) or object to processing (section 11). Requests can be sent to the Information Officer on the prescribed forms (POPIA Form 1 for objections, POPIA Form 2 for correction or deletion), available on the Information Regulator's website. We may ask for proof of identity.

8. How to request access to a record

1. Complete Form 2 (Request for Access to Record) from the Information Regulator's website.
2. Identify the record clearly enough for us to find it, state which right you want to exercise or protect, and explain why you need the record for that purpose (section 53 of PAIA).
3. State the form of access you want, for example a copy by email or inspection at our offices.
4. Include proof of identity. If you are acting for someone else, include proof that you are authorised to do so.
5. Send the form to the Information Officer at privacy@ai-inside.co.za or to the address in section 2.

We will decide on your request within 30 days of receiving it. We may extend this period once by up to 30 days where PAIA allows it, and will tell you the reasons. If the request concerns a third party's information, we must notify that third party, and this may affect the timeline. We will inform you of the outcome on Form 3.

9. Fees

The fees are prescribed in Annexure B to the PAIA Regulations, 2021

Item	Fee
Request fee (not payable by a personal requester asking for their own records)	R140.00
Photocopy or printed copy, per A4 page or part thereof	R2.00
Search for and preparation of the record, per hour or part of an hour, excluding the first hour	R145.00, not exceeding R435.00 in total
Deposit, if search and preparation are expected to take more than six hours	Not more than one third of the access fee
Postage, email or other electronic transfer	Actual cost, if any

Fees for other forms of reproduction are charged as set out in Annexure B. If access is granted, we will release the record once the access fee has been paid. You may apply to court to challenge a fee.

10. Grounds for refusal

We may or must refuse access, in whole or in part, on the grounds set out in Chapter 4 of Part 3 of PAIA. These include:

- protecting the personal information of a third party who is a natural person (section 63);
- protecting commercial information of a third party (section 64);
- protecting confidential information of a third party (section 65);
- protecting the safety of individuals and property (section 66);
- records that are privileged from production in legal proceedings (section 67);
- protecting our own commercial information, such as trade secrets, training materials and methodologies (section 68);
- protecting research information (section 69).

Even where a ground for refusal applies, we must grant access if disclosure would reveal evidence of a substantial breach of the law or an imminent and serious risk to public safety or the environment, and the public interest in disclosure clearly outweighs the harm (section 70).

11. Remedies

There is no internal appeal against a decision of a private body. If your request is refused, or if we do not respond in time, you may:

- lodge a complaint with the Information Regulator within 180 days (section 77A of PAIA); or
- apply to a court with jurisdiction (section 78 of PAIA).

12. Availability of this manual

This manual is available:

- on our website at ai-inside.co.za/paia-manual;
- at our offices for inspection during normal business hours, free of charge;
- to the Information Regulator on request.

A printed copy is available at the prescribed fee.

13. Updating this manual

The Head of AI Inside (Pty) Ltd will review and update this manual regularly, at least once a year and whenever our services, service providers or processing activities change significantly.

Issued by

Daniela Purps

Director and Information Officer, AI Inside (Pty) Ltd

Signature:

A handwritten signature in black ink, appearing to be 'DP' or similar initials.

Date: 12 October 2026