

Search and preparation, per hour or part of an hour after the first hour	R145 00, capped at R435 00
Deposit where the search will exceed six hours	One third of the access fee
Postage, email or other electronic transfer	Actual expense

10 2 Fees are as prescribed in Annexure B to the Regulations relating to the Promotion of Access to Information, 2021. If the Company is a registered VAT vendor, it may add VAT to these fees.

10 3 No request fee is payable by a personal requester, that is, a person requesting access to a record that contains personal information about that person (section 54(1) of PAIA). A data subject who requests access to their own personal information under section 23 of POPIA also pays no request fee.

11. AVAILABILITY OF THIS MANUAL

11 1 This Manual is available (a) on the Company's website at ntswakazah.co.za, and (b) at the Company's head office, for inspection during business hours.

11 2 The Manual is published in English.

12. UPDATING

12 1 The Information Officer will review and update this Manual whenever the Company's details, records or processing change, and at least annually. The first page records the dates of compilation and revision.

Signed at ____ Parklands ____ on ____ 2026-09-27 ____



Kholofelo Makwela

Information Officer (Director)

Union's Standard Contractual Clauses Personal information is transferred outside South Africa only to a recipient that provides a level of protection substantially similar to POPIA, as section 72 requires

8.5 Security measures The Company protects personal information with appropriate, reasonable technical and organisational measures encryption in transit and at rest, access controls and authentication, logging and monitoring, regular backups, vulnerability management, and confidentiality undertakings from staff and service providers

9. HOW TO REQUEST ACCESS TO A RECORD

9.1 Complete Form 2, available from the Regulator's website or from the Information Officer, and send it to the Information Officer at support@ntswakazah.co.za

9.2 In the form you must (a) describe the record, (b) identify the right you are exercising or protecting and explain why you need the record for that right, (c) prove your identity, and your authority if you act for someone else, and (d) choose the form of access A data subject requesting access to their own personal information under section 23 of POPIA does not need to identify a right or explain why the record is required

9.3 Pay the request fee in section 10 The Company will notify you of the outcome, and of any access fee, on Form 3, ordinarily within 30 days

9.4 Access may be refused only on the grounds in Chapter 4 of Part 3 of PAIA, which protect among other things another person's privacy, commercial information, confidences and legally privileged material

9.5 There is no internal appeal against a decision of a private body You may complain to the Regulator on Form 5 within 180 days of the decision, or apply to court The Regulator's contact details appear in clause 4.2

10. FEES

10.1 The fees below apply to requests to the Company

Description	Amount
Request fee	R140.00
Photocopy or printed copy of an A4-size page	R2.00 per page or part of a page
Copy in computer-readable form on a flash drive provided by the requester	R40.00
Copy in computer-readable form on a compact disc	R40.00 if the requester provides the disc, R60.00 if the Company provides it
Transcription or copy of visual images	Outsourced, on quotation
Transcription of an audio record, per A4-size page	R24.00
Copy of an audio record	R40.00 on a flash drive or disc provided by the requester, R60.00 if the Company provides the disc

Users and paying customers	Learner profiles and learning records, subscription records, billing and payment records, support and complaint records, consent records
Suppliers and service providers	Contracts, invoices, and the record of the service providers that process personal information for the Company
Platform and security	System and access logs, security and incident records, business continuity records
Marketing	Contact lists, consent and opt-out records, campaign records
Legal and compliance	Agreements, disputes, insurance, policies, regulatory correspondence

7.2 The Company is the responsible party for all of the personal information it processes through the Service. It does not hold records as an operator on behalf of another responsible party.

8. PROCESSING OF PERSONAL INFORMATION

8.1 Purpose of processing The Company processes personal information to (a) provide the Service, including tutoring, practice, assessment and the recording of a user's progress, (b) apply usage limits and prevent abuse, (c) sell, bill for and administer paid subscriptions, (d) deal with support requests and complaints, (e) secure the Service, (f) recruit, employ and pay staff, and (g) comply with law. The Company does not process personal information for advertising, does not sell personal information and does not use third-party trackers.

8.2 Categories of data subjects and personal information

Categories of data subjects	Personal information that may be processed
Users of the Service, including children	Chosen nickname, grade and subject choices, learning progress and mastery, practice and tutor attempts, streak and study-day counts, usage counts, and the questions, working and page images submitted to an artificial-intelligence feature
Competent persons who accept the Terms and Conditions of Use for a child	Names, contact details and the record of the consent given
Paying customers	Names, contact details, payment and billing information
Employees and job applicants	Identity and contact details, qualifications, employment and payroll records
Supplier personnel	Names, contact details, bank details
People who contact support	Contact details and the content of the request

8.3 Recipients Personal information may be supplied to (a) the Company's hosting provider, Lovable Labs Incorporated ("Lovable"), (b) the Company's artificial-intelligence provider, Lovable, which, through its AI Gateway and using models from Google (Gemini) and OpenAI, processes the questions, working, page images and text for reading aloud that a user submits to an AI feature, (c) the Company's payment processor, PayFast, (d) the Company's professional advisers, and (e) regulators and other authorities where the law requires it.

8.4 Transborder flows Personal information is hosted by Lovable. Lovable and the model providers it uses process personal information outside South Africa, including in the United States. Lovable's transfers are governed by its Data Processing Agreement, which incorporates the European

5.1 The records in the table below are available without a formal request under PAIA

Category	Types of records	How to access
Website and application content	Product information, plan and pricing descriptions, learner guidance and the plain-language privacy and safety page	In the Service and on the website
Legal documents	Terms and Conditions of Use, Privacy Policy, Subscription and Billing Terms, Refund Policy, Cancellation Policy, Consumer Disclosures and this Manual	In the Service and on the website
Marketing material	Brochures and newsletters	On the website or on request
Careers	Advertised positions	On the website or on request

6. RECORDS AVAILABLE UNDER OTHER LEGISLATION

6.1 The Company keeps records under other legislation, including the records below. Access is given in accordance with that legislation and PAIA

Legislation	Records
Companies Act 71 of 2008	Memorandum of incorporation, securities register, minutes and resolutions, annual financial statements
Income Tax Act 58 of 1962	Tax returns, assessments and supporting records
Basic Conditions of Employment Act 75 of 1997, Labour Relations Act 66 of 1995, Employment Equity Act 55 of 1998	Employment contracts, payroll, leave and employment equity records
Unemployment Insurance Act 63 of 2001, Skills Development Levies Act 9 of 1999, Compensation for Occupational Injuries and Diseases Act 130 of 1993	UIF, levy and compensation records
POPIA and PAIA	This Manual, the privacy policy, consent and opt-out records

7. SUBJECTS AND CATEGORIES OF RECORDS HELD

7.1 The Company holds records on the subjects below

Subject	Categories of records
Company and statutory	Incorporation documents, statutory registers, resolutions and minutes
Finance and tax	Financial statements, ledgers, invoices, banking and tax records, asset registers
Human resources	Employment contracts, payroll, leave, performance and disciplinary records, job applications

NTSWAKAZA HOLDINGS (PTY) LTD

Registration number 2026/684248/07

PAIA MANUAL

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

Date of compilation 1 October 2026

Date of last revision 1 October 2026

1. DEFINITIONS

1 1 In this Manual (a) "Company" means NTSWAKAZA HOLDINGS (PTY) LTD, registration number 2026/684248/07, (b) "competent person" means a person legally competent to consent on behalf of a child, (c) "Guide" means the guide published by the Regulator under section 10 of PAIA, (d) "Information Officer" means the head of the Company for the purposes of PAIA and POPIA, and includes a deputy information officer, (e) "PAIA" means the Promotion of Access to Information Act 2 of 2000, (f) "POPIA" means the Protection of Personal Information Act 4 of 2013, (g) "Regulator" means the Information Regulator established under section 39 of POPIA, (h) "Service" means Tutor ya Rena — Your Maths and Science Tutor — the learning application and website the Company operates at ntswakazah co za, and (i) "user" means a person who uses the Service

2. PURPOSE OF THIS MANUAL

2 1 This Manual tells you (a) which records the Company holds and how to request access to them, (b) which records are available without a formal request, (c) how the Company processes personal information, (d) who to contact for help with a request, (e) how to obtain the Guide, and (f) what fees apply and what remedies you have

3. CONTACT DETAILS

3 1 Information Officer Kholofelo Makwela (Director), email support@ntswakazah co za

3 2 Deputy Information Officer none appointed

3 3 Access to information requests support@ntswakazah co za

3 4 Head office physical address 16 Dartford Drive, Parklands, Cape Town, Western Cape, 7441, email support@ntswakazah co za, website ntswakazah co za

4. THE GUIDE ON HOW TO USE PAIA

4 1 The Regulator has published the Guide under section 10 of PAIA in each official language. The Guide explains the objects of PAIA and POPIA, the contact details of information officers, how to make a request for access to a record, the assistance available from information officers and from the Regulator, and the remedies available, including complaints to the Regulator and applications to court.

4 2 The Guide is available (a) on the Regulator's website at <https://info regulator org za>, (b) from the Regulator on request (enquiries@info regulator org za, 010 023 5200), and (c) from the Information Officer on request.

4 3 A copy of the Guide in English may be inspected at the Company's head office during business hours.

5. RECORDS AVAILABLE WITHOUT A REQUEST