

Promotion of Access to Information Act (PAIA) Manual

Prepared in accordance with Section 51 of the Promotion of Access to Information Act, 2 of 2000 (PAIA) – 30.04.2025

1. Contact Details

Name of Private Body: Neurozone (Pty) Ltd

Head of Body: Dr. Etienne van der Walt (CEO)

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Telephone Number: +27 79 537 4805

Email Address: info@Neurozone.com

Website: www.Neurozone.com

2. Introduction to Neurozone

Neurozone is a neuroscience-based leadership and resilience company focused on high-performance systems for individuals, teams and organizations. Our offerings include diagnostics, training courses and the Neurozone App, all based on our proprietary neuroscience framework.

3. Guide on How to Use PAIA

A guide is available from the South African Human Rights Commission (SAHRC) that explains how to exercise your rights under PAIA. Please contact the SAHRC for more information:

Website: www.sahrc.org.za | Telephone: 011 877 3600

4. Voluntary Disclosure of Records

The following records are available without a formal PAIA request:

- Marketing and promotional material
- Published articles and thought leadership content
- Publicly accessible website content
- Information about our products and services

5. Records Available Upon Request

The following records may be available on request, subject to applicable legal requirements:

- Financial records and statements
- Personnel and HR records (internal use only)

- Assessment results and program data (client-specific and confidential)
- Operational policies and procedures
- Partnership agreements and NDAs (if permissible)
- IT, system, and cybersecurity protocols

6. Request Procedure

Requests for access must be made in writing using the prescribed PAIA Form C and sent to the designated email or postal address. A request fee may apply. You will be informed of the outcome within 30 days.

7. Grounds for Refusal of Access

Access to information may be refused on the following grounds:

- Protection of personal information of third parties
- Commercial confidentiality
- Privileged legal documents
- Safety and security concerns

8. Processing of Personal Information (POPIA)

Neurozone processes personal information in line with the Protection of Personal Information Act (POPIA). We apply strict data protection principles and ensure appropriate safeguards for all personal data collected, stored, and processed.

9. Availability of the Manual

This manual is available on our website (www.Neurozone.com) and at our head office. Copies can also be requested by contacting our information officer.

Expanded Section 8: POPIA Compliance in Detail

Neurozone (Pty) Ltd respects your right to privacy and processes personal information in accordance with the Protection of Personal Information Act (POPIA), 4 of 2013.

8.1. Types of Personal Information Collected

- Employee information (e.g., names, ID numbers, contracts)
- Client data (names, email addresses, company details)
- Assessment data

8.2. Purpose for Processing Personal Information

- Delivering and improving Neurozone products and services (only aggregated data used)
- Communicating with clients, partners, and stakeholders
- Legal compliance and audit requirements
- Internal research and product development

8.3. Data Subject Rights

You have the right to:

- Access your personal information
- Request correction or deletion
- Object to processing
- Lodge a complaint with the Information Regulator

8.4. Security Safeguards

Neurozone implements robust security measures including:

- Encrypted storage and communications
- Two-factor authentication for system access
- Access controls based on role
- Secure cloud infrastructure partners

8.5. Retention and Destruction of Records

Records are retained only as long as necessary for lawful business or regulatory purposes, after which they are securely destroyed or anonymized.

8.6. Cross-Border Data Transfers

Where necessary, data is transferred outside South Africa only to countries with adequate data protection laws or with appropriate safeguards in place.

Appendix A: PAIA Request Form (Form C)

This is the prescribed form to be used when requesting access to records in terms of PAIA.

REQUEST FOR ACCESS TO RECORD OF PRIVATE BODY

(Section 53(1) of the Promotion of Access to Information Act, 2000)

A. Particulars of Private Body:

Name of Private Body: Neurozone (Pty) Ltd

B. Particulars of person requesting access to the record:

Full Names:

Identity Number:

Postal Address:

Telephone Number:

Email Address:

Capacity in which request is made (if made on behalf of another person):

C. Particulars of person on whose behalf request is made (if applicable):

Full Names:

Identity Number:

D. Particulars of record:

1. Description of record or relevant part of the record:

2. Reference number (if available):

3. Any further particulars of record:

E. Form of access to record:

(Mark appropriate box)

- Copy of record

- Inspection of record

- Email / electronic copy

- Transcription (if audio)

F. Right to be exercised or protected:

Explain why the record is required and how it relates to the exercise or protection of your right:

G. Notice of decision:

How would you prefer to be informed of the decision regarding your request? (e.g., email, post)

Signed:

Date:

Appendix B: PAIA Submission Checklist

We use this checklist to ensure full compliance with the PAIA and POPIA requirements.

- Manual includes all sections required under Section 51 of PAIA.
- POPIA section clearly describes data processing, rights, and safeguards.
- Form C included as Appendix A.
- Manual is publicly available on the company's website.
- Manual is available for inspection at the company's head office.
- Information Officer is formally designated in writing.
- Manual submitted to the Information Regulator: PAIACompliance@inforegulator.org.za
- Submission email includes subject line: 'PAIA Manual Submission Neurozone Pty Ltd'
- Submission includes the manual as a PDF or Word attachment.

Appendix C: Integration with Neurozone Privacy Policy

This PAIA Manual integrates and reflects key components of Neurozone’s published Privacy and Data Policy (Version 1.0, updated 11 January 2021), which outlines our commitment to lawful and secure processing of personal information in compliance with POPIA.

C.1 Data Types Collected

- Identity Data (name, date of birth, nationality, gender, job title)
- Contact Data (email, physical and billing address, phone numbers)
- Financial Data (banking and payment information)
- Transaction Data (service access records and payment history)
- Technical Data (IP address, browser data, platform, plug-ins)
- Usage Data (site interaction patterns, time spent, clickstream data)
- Marketing and Communications Data (preferences, interactions)
- Aggregated or Pattern Data (statistical data not linked to identity)

C.2 Consent and Lawful Processing

Personal information is processed only with data subject consent or where lawful processing grounds apply. Consent may be given via opt-in mechanisms including checkboxes, digital submissions, or written agreement. Neurozone also processes data on behalf of others only with appropriate consent and indemnification.

C.3 Security Measures

Neurozone maintains strict access controls, encrypted communication protocols, and secure cloud infrastructure. All data collected via the website, applications, and digital services is safeguarded using up-to-date cybersecurity practices.

C.4 Children’s Data

Neurozone’s services are not intended for children unless data is submitted with the explicit consent of a parent or guardian.

C.5 Third-Party Interactions and Data Sharing

Neurozone’s Sites, Products, and Applications may link to third-party services. Users should consult the privacy policies of those third parties independently, as Neurozone cannot be held liable for how third parties manage user data.

C.6 Data Subject Responsibilities

Users must provide accurate and current personal information and obtain the necessary consent when submitting information on behalf of another individual.

C.7 Failure to Provide Required Data

If personal information is not provided when required by law or contract, Neurozone may not be able to deliver certain services and will notify affected parties accordingly.

Appendix D: Neurozone Data Protection and Security Measures

This appendix provides a summary of the technical and organizational measures that Neurozone implements to protect personal information, as outlined in its Data Protection Statement (2021).

D.1 Technical Security Controls

- Hosting in Google Cloud and Microsoft Azure environments with encrypted weekly backups.
- Security controls aligned with ISO 27001, ISO 27018, and OWASP Top 10 frameworks.
- Multi-layered application security including CI/CD vulnerability scanning and peer review.
- Role-restricted API access secured via Google Firebase and HTTPS.
- Infrastructure security using serverless architecture, IP whitelisting, and SSH key control.
- Data encrypted in transit and at rest using AES-256, TLS 1.3, and Google's ALTS protocol.

D.2 Organizational Security Measures

- Information Officer appointed and registered with the Information Regulator.
- Privacy Management Framework established, covering governance, training, risk, and incident response.
- Third-party operator contracts in place and subject to regular evaluation.
- Regular backups and access control reviews following least privilege principles.
- Remote access policy implemented; local data storage prohibited.

D.3 Policies and Governance Documents

- Mobile Devices Policy
- IT Security Policy
- Data Protection Policy
- Electronic Information and Communication Systems Policy
- Direct Marketing Policy

- Incident Response Policy

D.4 Training and Awareness

- Clean desk and clear screen policy in place.
- Privacy training to be implemented semi-annually for employees and contractors.
- Processing of Personal Information awareness campaigns in progress.

D.5 Customer and Legal Compliance Measures

- Email legal disclaimers referencing the Privacy Policy.
- Privacy Policy and Data Protection Statement made available on the Neurozone website.
- Updated customer agreements reflecting POPIA compliance (including SaaS terms).