

PROMOTION OF ACCESS TO INFORMATION ACT (PAIA) AND
PROTECTION OF PERSONAL INFORMATION ACT (POPIA) MANUAL

FOR: BRISKTECH (PTY) LTD

Registration Number: 2026 / 411642 / 07

(hereinafter referred to as "the Company")

1. PURPOSE OF THIS MANUAL

This Manual has been prepared in accordance with Section 51 of the Promotion of Access to Information Act, No. 2 of 2000 ("PAIA") and gives effect to the statutory requirements of the Protection of Personal Information Act, No. 4 of 2013 ("POPIA") within the private corporate structure of the Company. It serves to outline the types of records held by the Company and the structural procedures required to request access to such information.

2. COMPANY CONTACT DETAILS & INFORMATION OFFICER

In terms of POPIA and PAIA, the duly appointed head of the private body acts as the default Information Officer. All requests for access to records must be directed to:

Information Officer: Devon Hegyi

Physical Address: 26a Pitzer Road Glen Austin AH Midrand 1685

Postal Address: 26a Pitzer Road Glen Austin AH Midrand 1685

Telephone Number: 0665697215

Email Address: support@brisktech.co.za

Website URL: www.brisktech.co.za

3. THE PAIA GUIDE

The Information Regulator has compiled a guide in terms of Section 10 of PAIA, containing information required by any person wishing to exercise any right contemplated in PAIA and POPIA. This guide is available in all official languages from the Information Regulator's official portal (info regulator.org.za).

4. RECORDS AVAILABLE IN ACCORDANCE WITH APPLICABLE SOUTH AFRICAN LEGISLATION

The Company maintains structural documentation and operational records in accordance with the following local legislation:

- Companies Act No. 71 of 2008
- Income Tax Act No. 58 of 1962
- Value Added Tax Act No. 89 of 1991
- Consumer Protection Act No. 68 of 2008
- Protection of Personal Information Act No. 4 of 2013
- Electronic Communications and Transactions Act No. 25 of 2002

5. SCHEDULE OF RECORDS HELD BY THE COMPANY (Section 51(1)(d))

The following categories of internal documents are held by the Company. Access to these records is not automatic and must be formally requested via the operational procedures outlined in Section 8 of this manual:

5.1 Corporate & Administrative Records

- Memorandum of Incorporation (MOI)
- Companies and Intellectual Property Commission (CIPC) registration certificates
- Share registers and internal group structure resolution documents

5.2 Financial & Tax Records

- Annual Financial Statements and accounting books
- Tax returns, assessments, and corporate VAT records
- Asset registers and intercompany equipment lease tracking

5.3 Operational and Client Data

- Customer profiling logs, invoice tracking, and digital transaction history
- Unstructured client email correspondence, specification briefs, and technical schematics

6. POPIA PERSONAL INFORMATION PROCESSING DETAILS

6.1 Purpose of Processing

The Company processes personal information strictly for the purposes of client onboarding, automated calculation of quotation metrics, transaction management, payment validation, logistics fulfilment with third-party networks, and targeted digital marketing campaigns.

6.2 Categories of Data Subjects and Information Held

- Customers & Web Users: Full names, contact telephone numbers, physical street addresses, email communications, and device tracking data.
- Suppliers & Partners: Corporate registration data, financial billing coordinates, and service level agreements.

6.3 Recipients or Categories of Recipients to Whom PII is Disclosed

- Operational Logistics: Shared with The Courier Guy (Pty) Ltd to perform structural home deliveries.
- Technical Infrastructure: Shared with Llama Index Inc. (USA) via transient, zero-retention data pipelines strictly for structural PDF parsing and text indexing functionalities.

6.4 Cross-Border Transfers of Personal Information

To facilitate rapid automated quotation pipelines, the Company securely transfers unstructured document data (such as specification sheets) to cloud endpoints managed by Llama Index Inc. in the United States of America. These transient transfers are protected by automated zero-retention parameters, ensuring all personal records are immediately and permanently purged post-extraction.

6.5 Information Security Measures

The Company deploys industry-standard technical security practices, including data-at-rest encryption protocols, secure socket layers (SSL), localized firewall barriers, and strict programmatic access restrictions to secure records against unauthorized access, hacking, or physical data breaches.

7. GROUNDS FOR REFUSAL OF ACCESS TO RECORDS

The Company may legally refuse a request for access to records if the disclosure would compromise:

- The commercial privacy of a third party or protect trade secrets.
- Mandatory protection of personal information under POPIA framework constraints.
- The safety and structural security of individuals or private corporate assets.

8. ACCESS REQUEST PROCEDURE (PAIA FORM 2)

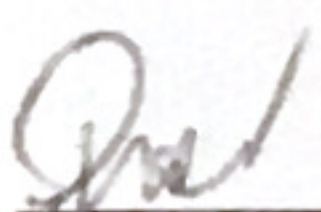
Any individual requesting access to private records held by the Company must submit a formal request using the prescribed **Form 2 (Request for Access to Record)**, which can be acquired on the Information Regulator's portal.

- The form must be emailed directly to support@brisktech.co.za.
- The request must provide adequate identity confirmation details and state the specific legal right the applicant seeks to protect.
- Prescribed regulatory fees may apply depending on the size and administrative reproduction costs of the requested records.

9. AVAILABILITY OF THIS MANUAL

This Manual is made available for public inspection at the physical corporate address of the Company, and is structurally accessible for download on the company website.

SIGNED AT 20:22 ON THIS 05 DAY OF 27
2026



Information Officer: Devon Hegyi

Brisktech (Pty) Ltd