

PAIA and POPIA Manual

Adopted 21 August 2026 | Elite Vision Holdings (Pty) Ltd

ELITE VISION HOLDINGS (PTY) LTD, trading as ELITE SCHOLARS Manual in terms of Section 51 of the Promotion of Access to Information Act, 2 of 2000 (PAIA), incorporating the processing descriptions required by the Protection of Personal Information Act, 4 of 2013 (POPIA)

Version 1.0	Adopted 21 August 2026	Next review: August 2027
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1. Introduction

This manual is published in terms of section 51 of the Promotion of Access to Information Act, 2 of 2000 ("PAIA"), as amended by the Protection of Personal Information Act, 4 of 2013 ("POPIA"). It explains how to request access to records held by Elite Vision Holdings (Pty) Ltd, trading as Elite Scholars ("the Company"), and describes how the Company processes personal information.

2. Company and Information Officer Contact Details

Registered name: Elite Vision Holdings (Pty) Ltd Registration number: 2025/272981/07 Trading as: Elite Scholars
Registered address: 85 5th Street, Halfway Gardens, Midrand, Gauteng, 1686 Website: elitescholars.co.za Email: info@elitescholars.co.za

Information Officer: Governor Baloyi (Director) Email: governor@elitescholars.co.za The Information Officer is registered with the Information Regulator (South Africa).

3. The Regulator's Guide (Section 10 of PAIA)

The Information Regulator has published a Guide on how to use PAIA, in all official languages, explaining how to complete request forms, fees, and remedies. The Guide is available from the Information Regulator: Website: <https://infoeregulator.org.za> Email: infoereg@infoeregulator.org.za Physical: JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001

4. Records Available in Terms of Other Legislation

The Company holds records in terms of, among others: the Companies Act 71 of 2008 (statutory company records), the Income Tax Act 58 of 1962 and Value-Added Tax Act 89 of 1991 (tax records), the Basic Conditions of Employment Act 75 of 1997 and related labour legislation (staff and contractor records), the Consumer Protection Act 68 of 2008 (client agreements), POPIA (personal-information processing records), and the Broad-Based Black Economic Empowerment Act 53 of 2003 (B-BBEE affidavit).

5. Categories of Records Held

5.1 Company and statutory records: incorporation documents, share register, resolutions, statutory registers.

5.2 Financial records: annual financial statements, management accounts, invoices, quotations, payment and settlement records, bank records, SARS filings.

5.3 Client and learner records: enquiries, enrolments, parent/guardian and learner account information, consent records, session and progress records, communications.

5.4 Workforce records: tutor, advisor and referrer applications, verification documents (identity, qualifications, police clearance), contracts and agreements, payout and commission records.

5.5 Operational and technology records: platform data (user accounts, roles, audit logs), analytics records (first-party), notification and correspondence records, supplier and operator agreements.

5.6 Marketing records: website content, campaign and referral-programme records.

6. Records Automatically Available (No PAIA Request Needed)

Website content at elitescholars.co.za, including service and programme descriptions, published pricing, the privacy notice, and this manual.

7. How to Request Access to a Record

7.1 Complete the prescribed request form (Form 2, PAIA Regulations 2021), available from the Information Regulator's website or from the Information Officer.

7.2 Submit it to the Information Officer at governor@elitescholars.co.za or the registered address, together with the prescribed request fee (currently R140 for private bodies; the Information Officer will confirm the current prescribed amount and any access/reproduction fees per the PAIA Fees Regulations).

7.3 Provide sufficient particulars to identify the record and the right you seek to exercise or protect (where the request relates to third-party rights), and proof of identity.

7.4 The Company will respond within 30 days as required by PAIA, subject to the Act's provisions for extension, third-party notification and grounds of refusal (including protection of third-party personal information, commercial confidentiality and legal privilege).

7.5 If a request is refused, the requester may lodge a complaint with the Information Regulator or apply to court as provided in PAIA.

8. Processing of Personal Information (POPIA Description)

8.1 Purpose of processing: providing tutoring, advisory and application-support services; client onboarding and account management; billing and payment processing; workforce (tutor/advisor/referrer) recruitment, verification and payment; referral-programme administration; communication with parents, guardians and learners; safeguarding; legal and regulatory compliance; and service improvement via first-party analytics.

8.2 Categories of data subjects and information:

- Learners (including children under 18): name, school, grade, curriculum, subjects, academic goals and progress, session records.
- Parents/guardians and adult clients: name, contact details, consent records, billing and payment references.
- Tutors, advisors and referrers: identity and contact details, qualifications, vetting records (including police clearance), banking details, contract and payout records.
- Website visitors: first-party analytics data (self-hosted; no third-party advertising trackers).

8.3 Children's information: the Company processes children's personal information for the delivery of education-support services, with consent obtained from a parent or guardian at registration. Children cannot create accounts independently.

8.4 Recipients: personal information may be processed by the Company's operators, payment gateways (Ozow, PayFast, Paystack), cloud hosting and storage (Amazon Web Services), authentication (Google Firebase) and email delivery, under data-processing terms as required by POPIA sections 20-21. Personal information is not sold or shared for third-party marketing.

8.5 Cross-border transfers: platform infrastructure is hosted in an AWS region outside South Africa (us-east-1, United States). Transfers rely on contractual safeguards in the AWS Data Processing Addendum providing an adequate level of protection as contemplated in section 72(1)(a) of POPIA.

8.6 Security measures: role-based access control; least-privilege administrative access; audit logging; encryption in transit; per-environment authentication; multi-factor authentication on administrative systems; no storage of cardholder data (payments processed by PCI DSS-compliant gateways).

8.7 Data subject rights: data subjects (or, for children, their parents/guardians) may request access to, correction of, or deletion of their personal information, and may object to processing or withdraw consent, by contacting the Information Officer. The Company responds per its documented data-subject-request procedure.

8.8 Retention: personal information is retained only as long as required for the purposes above or as required by law (e.g. tax and company records), after which it is deleted or de-identified.

9. Availability of this Manual

This manual is available on the Company website (elitescholars.co.za) and at the registered office, and will be provided on request to the Information Officer. It is reviewed annually.

Adopted by: _____ (Governor Baloyi, Director and Information Officer) Date: _____