



GROENTECH SYSTEMS (PTY) LTD

Registration number: 2021/676603/07

PAIA MANUAL

Prepared in terms of section 51 of the Promotion of Access to Information Act 2 of 2000 (as amended)

Date of compilation: 15 July 2026

Date of last revision: 28 July 2026 (Revision 2)

1. List of acronyms and abbreviations

Acronym	Meaning
"IO"	Information Officer
"MD"	Managing Director
"Minister"	Minister of Justice and Correctional Services
"PAIA"	Promotion of Access to Information Act No. 2 of 2000 (as amended)
"POPIA"	Protection of Personal Information Act No. 4 of 2013
"Regulator"	Information Regulator (South Africa)
"Republic"	Republic of South Africa
"GS-Connect"	The compliance documentation platform operated by GroenTech Systems (Pty) Ltd at https://connect.groentechsystems.com

2. Purpose of this PAIA Manual

This PAIA Manual is useful for the public to —

- check the categories of records held by GroenTech Systems (Pty) Ltd ("the Company") which are available without a person having to submit a formal PAIA request;
- have a sufficient understanding of how to make a request for access to a record of the Company, by providing a description of the subjects on which the Company holds records and the categories of records held on each subject;
- know the description of the records of the Company which are available in accordance with any other legislation;
- access all the relevant contact details of the Information Officer who will assist the public with the records they intend to access;
- know the description of the guide on how to use PAIA, as updated by the Regulator, and how to obtain access to it;
- know the purposes for which the Company processes personal information and the categories of data subjects and information concerned;
- know the recipients or categories of recipients to whom personal information may be supplied;
- know whether the Company plans to transfer or process personal information outside the Republic of South Africa, and the recipients or categories of recipients concerned; and
- know whether the Company has appropriate security measures to ensure the confidentiality, integrity and availability of the personal information it processes.

3. Key contact details for access to information

3.1 Information Officer

Field	Detail
Name	Robert Groenewald (Managing Director — Information Officer by default under section 56 of POPIA read with PAIA)
Telephone	071 878 3627
Email	admin@groentechsystems.com
Fax	Not applicable — the Company does not operate a fax line

3.2 Deputy Information Officer

No Deputy Information Officer has been designated. All requests are handled by the Information Officer.

3.3 Access to information — general contact

Field	Detail
Email	admin@groentechsystems.com

3.4 Head office

Field	Detail
Postal address	8 Crystal Crescent, Midstream Hill, Olifantsfontein, Gauteng, 1668
Physical address	8 Crystal Crescent, Midstream Hill, Olifantsfontein, Gauteng, 1668
Telephone	071 878 3627
Email	admin@groentechsystems.com
Website	https://connect.groentechsystems.com

4. The Regulator's Guide on how to use PAIA

The Regulator has, in terms of section 10(1) of PAIA, updated and made available the revised Guide on how to use PAIA (“the Guide”), in an easily comprehensible form and manner, as may reasonably be required by a person who wishes to exercise any right contemplated in PAIA and POPIA. The Guide is available in each of the official languages and in braille.

The Guide contains a description of the objects of PAIA and POPIA; the contact details of the Information Officers of public and private bodies; the manner and form of requests for access to records; the assistance available from Information Officers and from the Regulator; all remedies in law available in respect of rights and duties under PAIA and POPIA (including internal appeals, complaints to the Regulator and court applications); the provisions requiring bodies to compile a manual; the provisions on voluntary disclosure; the fee notices; and the regulations made under section 92 of PAIA.

Members of the public can inspect or make copies of the Guide from the offices of public and private bodies, including the office of the Regulator, during normal working hours. The Guide can also be obtained —

- upon request to the Information Officer at admin@groentechsystems.com; or
- from the website of the Regulator: <https://info regulator.org.za>.

A copy of the Guide is available for public inspection during normal office hours in the following two official languages: English and Afrikaans.

5. Records available without a formal PAIA request

The following categories of records are automatically available — on the website, or on request by email — without a person having to submit a formal PAIA request:

Category of records	Types of record	Website	On request
Marketing and product information	Product descriptions, platform features, pricing and plan information	✓	✓
Legal and privacy notices	Privacy Policy (/privacy), Terms of Service (/terms)	✓	✓
This PAIA Manual	Current version	✓	✓
Help and training documentation	Platform help articles and user guides	✓ (account holders)	✓
Company contact details	General contact information	✓	✓

Website: <https://connect.groentechsystems.com>

6. Records available in accordance with other legislation

Category of records	Applicable legislation
Memorandum of Incorporation, company statutory records and registers	Companies Act 71 of 2008
Accounting records, annual financial statements	Companies Act 71 of 2008
Tax returns, VAT records, tax invoices (including subscription tax invoices issued to customers)	Tax Administration Act 28 of 2011; Value-Added Tax Act 89 of 1991; Income Tax Act 58 of 1962
PAIA Manual	Promotion of Access to Information Act 2 of 2000
Privacy Policy and records of processing of personal information	Protection of Personal Information Act 4 of 2013
Electronic transaction and communication records	Electronic Communications and Transactions Act 25 of 2002

7. Subjects on which the Company holds records, and categories of records

Subject	Categories of records
Customer accounts	User account records (names, email addresses, roles, authentication records); customer company profiles (registration numbers, VAT and tax numbers, sector, addresses, contact details, director names, logos, product and service offerings)
Compliance documents	Documents uploaded by customers to the GS-Connect platform (e.g. B-BBEE certificates, company registration certificates) together with AI-extracted data fields, verification status and review history
Billing and finance	Subscription records, payment records, subscription tax invoices; customers' own billing documents created on the platform (quotes, invoices, statements, credit notes); banking details captured by customers for printing on their documents
Partner network	Partnership connections between customer companies, compliance scores, checklist runs and requirement rules
Support	Support tickets and correspondence with customers
Security and audit	Audit trails of document actions, communications log (notifications), security and access logs
Corporate records	Statutory company records, contracts with service providers, insurance and banking records

8. Processing of personal information (POPIA)

8.1 Purpose of processing

The Company processes personal information in order to —

- provide and administer the GS-Connect compliance documentation platform (account registration, authentication, team member management);
- classify and verify compliance documents uploaded by customers, including AI-assisted data extraction;
- improve the Company's own document-AI models: documents uploaded to the platform may be used to train the classification and field-extraction models that power document verification. Training happens within the Company's own Azure environment; documents are never shared with other customers or used to train any third party's general-purpose AI, and customers may opt out by emailing admin@groentechsystems.com;
- enable customers to share compliance status with connected partner companies;
- process subscription payments, issue tax invoices, and provide the platform's billing module;
- provide customer support and communicate service messages (including document expiry, checklist review and CIPC annual return reminders);

- secure the platform, prevent abuse, and maintain audit trails; and
- comply with legal obligations (including tax and company law retention duties).

8.2 Categories of data subjects and personal information

Categories of data subjects	Personal information that may be processed
Customers / platform users	Names, email addresses, hashed passwords, MFA enrolment data, role, consent records, usage and security logs
Customer companies (juristic persons — protected under POPIA)	Company names, registration numbers, VAT and income tax numbers, sector classification, addresses, contact details, director names, banking details (captured by the customer for their own billing documents), financial documents created on the platform
Persons named in uploaded compliance documents	Information contained in customer-uploaded documents, e.g. director names, identity numbers, B-BBEE information — processed on the customer's instruction as part of the service
Service providers	Names, contact details, registration and VAT numbers, banking details
Employees	Currently the Company has no employees other than its director; should this change: names, contact details, qualifications, employment and payroll records

8.3 Recipients to whom personal information may be supplied

Category of personal information	Recipients or categories of recipients
Account, platform and document data (hosting, storage and processing)	Operators contracted by the Company: Vercel (hosting and invisible bot protection), Neon (database), Microsoft Azure (document storage and AI document processing, including training of the Company's own document-AI models), Resend (transactional email), Anthropic (AI assistant processing), Upstash (rate limiting) — all under written operator/data-processing agreements
Payment data	Payfast (Network International) — South African payment processor; the Company does not store card details
Compliance profile and status	Partner companies the customer has chosen to connect with on the platform (controlled by the customer)
Records required by law	South African Revenue Service, the Information Regulator, other regulators and law enforcement where disclosure is required by law

8.4 Planned transborder flows of personal information

Personal information is stored and processed outside the Republic as follows:

Country / region	Provider	Categories of information
European Union (Germany)	Neon (database), Upstash (rate limiting), Vercel (compute region: Frankfurt), Microsoft Azure (blob storage, Document Intelligence)	All platform account and application data. Uploaded compliance documents and extracted data
United States of America	Vercel Inc. (hosting provider entity, including its bot-protection service), Resend (email), Anthropic (AI processing)	Email content and addresses; AI assistant conversations and support-ticket text; bot-protection signals

All of these providers are bound by data-processing agreements containing GDPR-standard protections, which provide a level of protection substantially similar to POPIA as contemplated in section 72(1)(a) of POPIA.

8.5 General description of information security measures

- Encrypted connections (TLS) for all traffic; encryption at rest for the database and document storage;
- passwords stored only as strong one-way hashes (bcrypt); multi-factor authentication, mandatory for all administrative/staff access;
- role-based access control and per-company data isolation on the platform;
- documents held in private cloud storage accessible only via short-lived signed URLs;
- enforced Content Security Policy, rate limiting and invisible bot protection;
- audit trails of document actions and a log of all outbound communications;
- automated daily deletion of expired authentication tokens and invitations (data minimisation);
- a documented breach response plan aligned with section 22 of POPIA; and
- written operator agreements with all service providers.

9. Availability of this Manual

A copy of this Manual is available —

- on the Company's website at <https://connect.groentechsystems.com>;
- at the Company's head office for public inspection during normal business hours;
- to any person upon request and upon payment of a reasonable prescribed fee; and
- to the Information Regulator upon request.

A fee for a copy of the Manual, as contemplated in annexure B of the PAIA Regulations, shall be payable per each A4-size photocopy made.

10. Updating of this Manual

The Information Officer will update this Manual on a regular basis, and whenever material changes are made to the Company's processing of personal information, its service providers, or the categories of records it holds.

Revision history: Rev 1 — 15 July 2026 (initial). Rev 2 — 28 July 2026 (added document-AI model improvement to the processing purposes in §8.1; bot protection provider changed from hCaptcha/Intuition Machines to Vercel BotID in §8.3 and §8.4).

Issued by



Robert Groenewald

Managing Director — Information Officer

GroenTech Systems (Pty) Ltd

Date: 28/07/2026