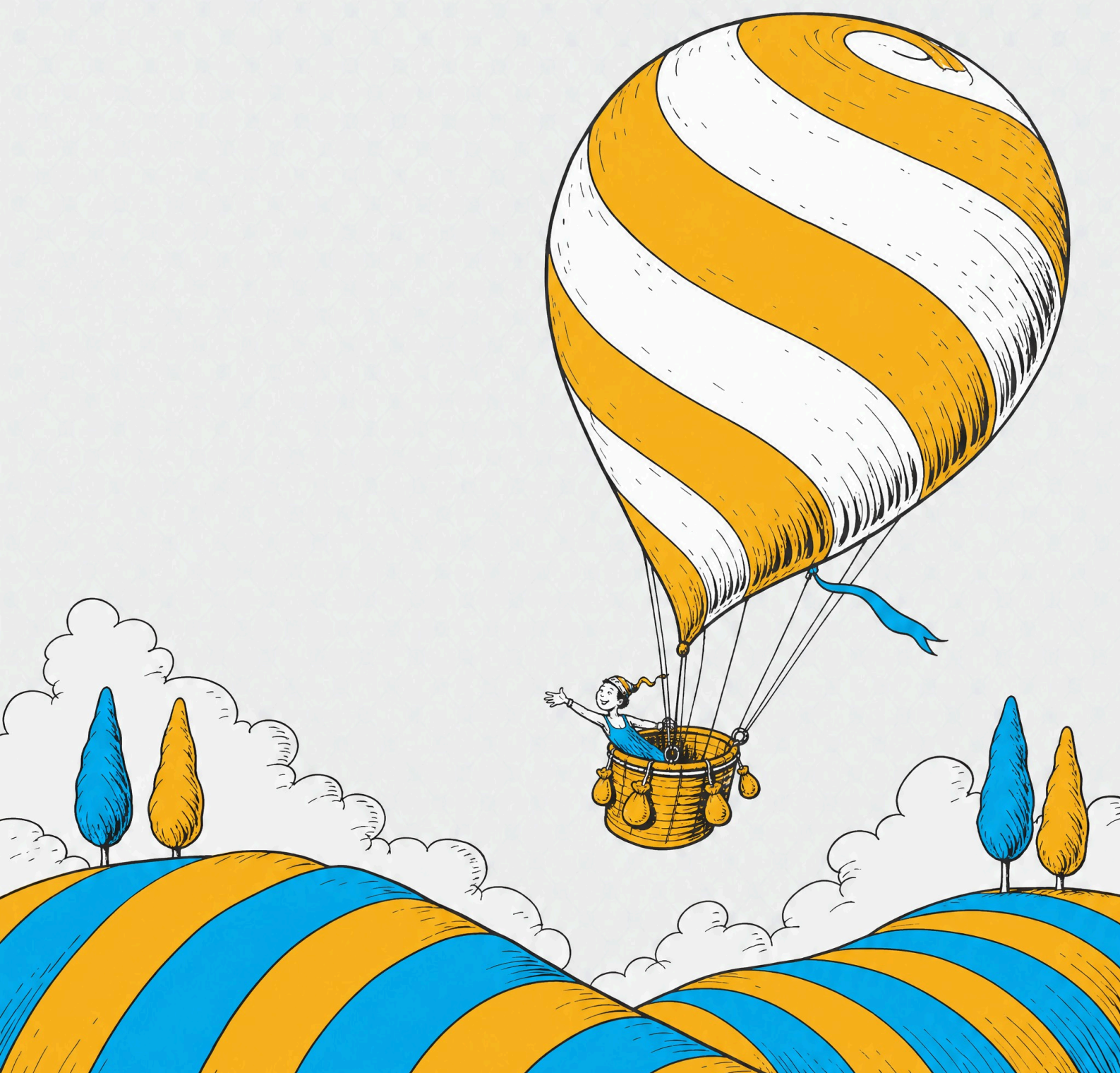


ACCESS TO INFORMATION

PAIA Manual

Prepared in terms of section 51 of the Promotion
of Access to Information Act 2 of 2000 - Genius
Premium Tuition (Pty) Ltd



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This manual is prepared in terms of section 51 of the Promotion of Access to Information Act 2 of 2000 (as amended) ("PAIA") by Genius Premium Tuition (Pty) Ltd (registration number 2017/133485/07) ("the Company" or "Genius").

It is useful to the public to -

1. check the categories of records held by the Company that are available without submitting a formal PAIA request;
2. understand how to make a request for access to a record of the Company, through the description of the subjects on which the Company holds records and the categories of records held on each subject;
3. know the records of the Company available in accordance with any other legislation;
4. access the contact details of the Information Officer who will assist the public with the records they intend to access;
5. know how to use the Regulator's Guide on PAIA and how to obtain access to it;
6. know that the Company processes personal information, the purpose of that processing, and the categories of data subjects and information;
7. know the categories of data subjects and the information relating to them;
8. know the recipients or categories of recipients to whom personal information may be supplied;
9. know whether the Company plans to transfer or process personal information outside the Republic; and
10. know whether the Company has appropriate security measures to ensure the confidentiality, integrity and availability of the personal information it processes.

Access is subject to PAIA, POPIA and any other applicable law. A record is not automatically disclosed merely because its category appears in this manual. The Information Officer considers each request on its facts and applies the statutory grounds for access or refusal.



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- **"DIO"** - Deputy Information Officer
 - **"IO"** - Information Officer
 - **"PAIA"** - Promotion of Access to Information Act 2 of 2000 (as amended)
 - **"POPIA"** - Protection of Personal Information Act 4 of 2013
 - **"Regulator"** - Information Regulator (South Africa)
 - **"Republic"** - Republic of South Africa
 - **"the Company" / "Genius"** - Genius Premium Tuition (Pty) Ltd



The **Information Officer** and head of the private body is **Dean Cook** (Managing Director).

- Telephone: +27 11 467 9884
- Email: privacy@geniuspremium.com

The **Deputy Information Officer**, designated under section 17(1) of PAIA and section 56 of POPIA, is **Bronwyn Haag** (Chief Operating Officer).

- Telephone: 067 412 8700
- Email: Bronwyn.h@geniuspremium.com

The general access-to-information contact is privacy@geniuspremium.com, which is monitored daily.

Head office

- Physical address: 26 Turaco Street, Norscot, Johannesburg, 2196
- Postal address: 26 Turaco Street, Norscot, Johannesburg, 2196
- Telephone: +27 11 467 9884
- Email: privacy@geniuspremium.com
- Website: <https://www.geniuspremiumtuition.com/>



1. The Regulator has, under section 10(1) of PAIA, published a Guide on how to use PAIA, in an easily comprehensible form, for any person who wishes to exercise a right under PAIA or POPIA.
2. The Guide is available in each of the official languages and in braille.
3. The Guide describes, among other things: the objects of PAIA and POPIA; the contact details of information officers and deputy information officers; the manner and form of a request for access to a record of a public body (section 11) and a private body (section 50); the assistance available from an information officer and from the Regulator; the remedies in law, including an internal appeal, a complaint to the Regulator, and an application to court; the manual provisions (sections 14 and 51); the voluntary disclosure of records (sections 15 and 52); the fee notices (sections 22 and 54); and the regulations made under section 92.
4. Members of the public may inspect or copy the Guide from the offices of public and private bodies, including the Regulator, during normal working hours.
5. The Guide may be obtained on request to the Information Officer, or from the Regulator's website: <https://infoeregulator.org.za/>.
6. The Company keeps a copy of the Guide for public inspection during normal office hours in English.



Subject to availability, copyright, confidentiality and ordinary access controls, the following records may be available without a formal request:

Category of records	Types of record	On website	On request
Corporate and marketing information	Company name and public contact details; service descriptions and packages; published fees where applicable	Yes	Yes
Privacy and access documents	Privacy policy; this PAIA Manual	Yes	Yes
Content	Articles and blog posts; events; announcements	Yes	Yes
People (public-facing)	Published staff and tutor profiles; testimonials; job advertisements	Yes	Yes
Social media	Public social-media posts	Yes	Yes
Statutory company records	CIPC records available through the official company-record process		Yes

Normal authentication, identity checks and business procedures still apply. This does not make another person's private record public.



Records are created and held in accordance with, among others, the following legislation. This list is illustrative and not exhaustive, and not every Act applies to every record.

Category of records	Applicable legislation
Memorandum of Incorporation; company and governance records	Companies Act 71 of 2008
This PAIA Manual; access-request records	Promotion of Access to Information Act 2 of 2000
Personal-information processing and consent records	Protection of Personal Information Act 4 of 2013
Employment, contracts and conditions	Basic Conditions of Employment Act 75 of 1997; Labour Relations Act 66 of 1995; Employment Equity Act 55 of 1998
Payroll, tax and VAT records	Income Tax Act 58 of 1962; Tax Administration Act 28 of 2011; Value-Added Tax Act 89 of 1991
Skills and levies	Skills Development Act 97 of 1998; Skills Development Levies Act 9 of 1999
Unemployment insurance	Unemployment Insurance Act 63 of 2001; Unemployment Insurance Contributions Act 4 of 2002
Workplace health, safety and injury	Occupational Health and Safety Act 85 of 1993; Compensation for Occupational Injuries and Diseases Act 130 of 1993
Consumer and electronic transactions	Consumer Protection Act 68 of 2008; Electronic Communications and Transactions Act 25 of 2002



Subject	Categories of records
Company governance and administration	Incorporation and CIPC records; director, shareholder and governance records; policies, approvals and material contracts; licences, registrations, insurance and statutory correspondence; PAIA and POPIA, complaints, disputes and legal records
Prospective clients, clients, parents and learners	Enquiries and communications; contact, identity and relationship details; learner, school, subject, curriculum, academic-need and scheduling information; assessments, quotations, agreements, packages and service records; tutoring schedules, attendance, lesson and progress records; invoices, payments, receipts and account records; consent, privacy-choice, complaint and support records
Staff, tutors, contractors and applicants	Applications, CVs and selection records; contact, identity, qualification and work-eligibility information; appointment, contract, role, allocation and performance records; payroll, banking, tax, leave and benefit records; training, conduct, incident, health-and-safety and termination records
Suppliers and business partners	Contact and due-diligence information; proposals, orders, contracts and correspondence; invoices, banking, payment and tax records; processor-management records
Finance, tax and assets	Accounting ledgers and supporting documents; management and annual financial records; tax returns, assessments and statutory submissions; banking, debtor and creditor records; asset and procurement records
Website, marketing and communications	Website content and publication records; advertising, campaign, analytics and conversion-measurement records; supported click identifiers and campaign parameters; retained correspondence; privacy-safe technical logs



8.1 Purpose of processing

The Company processes personal information to: answer enquiries and take steps toward providing a service; assess needs, prepare quotations and administer tutoring; communicate with clients, parents, learners, applicants, tutors, staff and suppliers; schedule, deliver, monitor and improve services; recruit, contract with, pay and manage staff, tutors and suppliers; invoice, collect payment, maintain accounts and comply with statutory duties; prevent fraud, abuse and security incidents; handle complaints, requests, disputes and legal claims; operate the website and understand service and advertising effectiveness; and for other compatible, disclosed or legally authorised purposes.

Children's (learners') information. Many learners are children under the age of 18. The Company processes a learner's personal information on the authority and with the consent of a parent or guardian, who is the contracting client, and in accordance with the heightened protections for children's personal information under POPIA (sections 34 and 35). Parent or guardian consent for the processing of a learner's information is obtained through the client agreement. The website enquiry form is intended for an adult or a parent or guardian.

8.2 Categories of data subjects and information processed

Categories of data subjects	Personal information that may be processed
Prospective clients and enquirers	Adult or parent name, contact details, location, branch, school, service need, message and enquiry history
Clients, parents and learners	Contact and relationship information; learner name, school, subject, curriculum and academic-need details; schedules, assessments and progress; agreements, billing and communications
Applicants, staff, tutors and contractors	Application, identity, contact, qualification, work-eligibility, contract, allocation, payroll, banking, tax, performance and statutory information
Suppliers and partners	Contact, contract, invoice, payment, due-diligence and correspondence records
Website visitors	Device and session information, approximate region, privacy choice, campaign parameters and supported advertising click identifiers

The Company does not send the enquiry message, school or child details to advertising providers. For website enhanced conversions, only a securely hashed adult or parent submitter email or phone number and supported click identifiers may be shared with Google; advertising personalisation and conversion-based customer lists are not enabled for this flow.

8.3 Recipients or categories of recipients

Category of personal information	Recipients or categories of recipients
Contact, service and account information	Authorised Genius staff, tutors and contractors; the Company's client-management, hosting, security, email, workflow and collaboration providers

Category of personal information	Recipients or categories of recipients
Financial, payroll and tax information	Accounting, payroll, payment, banking, insurance and audit providers; SARS and other statutory bodies as required by law
Website measurement data (hashed adult or parent contact and click identifiers)	Advertising and analytics providers, for the limited measurement described in the privacy policy
Any personal information	Statutory, regulatory, law-enforcement or judicial bodies where lawfully required; a successor or transaction adviser under appropriate confidentiality and legal safeguards

• 8.4 Planned transborder flows of personal information

Certain cloud and technology providers may process limited personal information outside the Republic, including Cloudflare (website security and delivery), Google and Google Workspace (analytics, advertising measurement and business email) and Zapier (controlled workflow routing). Provider locations and sub-processors can change. The Company keeps, or is establishing, a processor register and uses appropriate contracts, access controls and data minimisation before any cross-border disclosure. The Company does not currently target advertising to the United Kingdom or Europe and will reassess the legal, consent and transfer position before intentionally entering those markets.

• 8.5 Information security measures

Safeguards implemented or under implementation, according to the sensitivity and risk of the record, include: role-based and least-privilege access; strong and multi-factor authentication where supported; encrypted network transport and provider-managed storage safeguards; separation of public website configuration from private relay secrets; server-side validation, rate limiting, duplicate prevention and privacy-safe monitoring; supplier and processor review and controlled sharing; patching, anti-malware and endpoint protection; backups, availability monitoring and recovery; incident identification, containment, investigation and notification; and retention limits, de-identification and secure disposal when a record is no longer required. Security measures reduce but cannot eliminate risk, and are reviewed as systems, risks and legal requirements change.



A copy of this manual is available -

1. on the Company's website, <https://www.geniuspremiumtuition.com/>;
2. at the head office, 26 Turaco Street, Norscot, Johannesburg, 2196, for public inspection during normal business hours, being 09h00 to 16h00, Monday to Thursday, by reasonable prior arrangement;
3. to any person on request and on payment of a reasonable prescribed fee; and
4. to the Information Regulator on request.

A fee for a copy of the manual, as contemplated in Annexure B of the Regulations, is payable per A4-size photocopy made.



1. Complete the Regulator's current Form 2 (Request for Access to Record of a private body).
2. Identify the record precisely, including a reference, date range, the people or service involved, and the preferred form of access.
3. State the right that the record is required to exercise or protect, and why access is reasonably required for that purpose.
4. Attach proof of identity. When acting for another person, also attach proof of authority.
5. Send the request to privacy@geniuspremium.com, addressed to the Information Officer.
6. Pay only a fee lawfully prescribed and notified. Personal requesters may be treated differently from other requesters under PAIA.

The Company will acknowledge and assess a valid request, ask for clarification where reasonably needed, and communicate its decision within the prescribed period - granting access, granting partial access after severing protected information, or refusing on a lawful ground. The remedies available to a requester are described in PAIA and the Regulator's Guide.

A person requesting their own personal information, its correction or deletion, or objecting to processing, may also write to privacy@geniuspremium.com. The Information Officer will determine whether PAIA, POPIA or both apply, and may require identity verification first.



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- Website relay delivery and duplicate-prevention state: 24 hours, without retaining raw enquiry details.
 - Advertising click attribution: 90 days.
 - Browser measurement choice: 180 days.
 - Zapier task history containing personal information: 30 days or the shortest practical setting.
 - Enquiries that do not become clients: deleted or de-identified 24 months after the last meaningful contact, unless a documented legal or operational reason requires longer.
 - Client, accounting, employment and statutory records: retained according to a record-category legal schedule.



The head of the Company will update this manual on a regular basis and at least annually, and sooner when company details, records, processing, recipients, cross-border arrangements, security measures, forms or legal requirements materially change.

Issued by Dean Cook, Managing Director and Information Officer, Genius Premium Tuition (Pty) Ltd.

This manual was reviewed by the Company's attorney, Clifford Levin Incorporated, on 23 July 2026, and approved for use by the Information Officer on 24 July 2026. Effective date: 24 July 2026. Next scheduled review: 24 July 2027, or sooner on a material change.



Approved and signed for and on behalf of Genius Premium Tuition (Pty) Ltd by its Information Officer and head of the private body.

Signed at Cape Town on 24 July 2026.

Signature of the Information Officer:

Dean Cook

Managing Director and Information Officer

Genius Premium Tuition (Pty) Ltd



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