

PAIA MANUAL

Promotion of Access to Information Act, 2000
Act No. 2 of 2000

Prepared for

LIFESTYLE CALCULATOR

<https://mylifestylecalc.com>

Document version 1.0

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DRAFT — NOT READY FOR FINAL PUBLICATION

This manual contains [REQUIRED] fields that must be completed and legally reviewed before it is treated as final.

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1. Purpose of this manual

This manual is published in terms of section 51 of the Promotion of Access to Information Act 2 of 2000 (PAIA), as amended, to assist any person who wishes to exercise a right under PAIA in relation to records held by Lifestyle Calculator.

It has been prepared using the structure recommended by the Information Regulator (South Africa) for a private body, and describes:

- the functions and structure of Lifestyle Calculator;
- the categories of records held by Lifestyle Calculator;
- which records are automatically available without a formal request;
- how to request access to a record;
- the requirements that apply to a PAIA request;
- the grounds on which access to a record may be refused;
- the rights and remedies available to a requester;
- how personal information is processed in terms of the Protection of Personal Information Act 4 of 2013 (POPIA);
- how to contact the Information Officer.

Access to records is not automatic. Every request is considered in terms of PAIA and may be granted, partially granted or refused on the grounds permitted or required by the Act and other applicable law.

2. Introduction to Lifestyle Calculator

Lifestyle Calculator is an online financial modelling and educational platform operating in South Africa through the website listed in this manual. Users capture their own figures and the platform models and explains aspects of their financial position.

The platform allows a user to model and understand:

- income (net / take-home income);
- expenses and monthly budgets;
- needs, wants and savings allocations;
- assets, including property;
- debts and repayment obligations;
- savings and investments;
- financial freedom (FIRE) modelling;
- projected financial position over time;
- financial improvement opportunities and recommendations;
- financial scenarios and "what if" modelling;
- requests for financial help (lead requests).

Lifestyle Calculator is not a bank, financial institution, financial adviser, credit provider, insurer, investment provider or debt counsellor, and does not hold itself out as any of these. It is an educational financial modelling tool. Its calculations, scores, benchmarks, projections and recommendations are general and educational, and do not constitute personalised financial, investment, tax, legal or credit advice.

3. Details of the private body

Item	Detail
Legal entity name	[REQUIRED: INSERT LEGAL ENTITY NAME]
Trading name	Lifestyle Calculator
Registration number	[REQUIRED: INSERT COMPANY REGISTRATION NUMBER]
Registered address	[REQUIRED: INSERT REGISTERED / PHYSICAL ADDRESS]
Principal place of business	[REQUIRED: INSERT REGISTERED / PHYSICAL ADDRESS]
Website	https://mylifestylecalc.com
Telephone	[REQUIRED: INSERT TELEPHONE NUMBER]
General email	privacy@mylifestylecalc.com
Information Officer	Gideon Johannes Neiteler
Information Officer email	privacy@mylifestylecalc.com
Email for PAIA requests	privacy@mylifestylecalc.com
Deputy Information Officer	None appointed at the date of this manual

Any item shown above as **[REQUIRED: ...]** has not yet been confirmed by the business. It must be completed before this manual is treated as final. No company particulars are invented for the purposes of this manual.

4. Information Officer

The Information Officer is responsible for dealing with requests for access to records under PAIA, and for the duties of an Information Officer in terms of POPIA, including responding to data subjects who wish to exercise their privacy rights.

Item	Detail
Name	Gideon Johannes Neiteler
Email	privacy@mylifestylecalc.com
Telephone	[REQUIRED: INSERT TELEPHONE NUMBER]
Postal address	[REQUIRED: INSERT POSTAL ADDRESS]
Physical address	[REQUIRED: INSERT REGISTERED / PHYSICAL ADDRESS]
Deputy Information Officer	None appointed at the date of this manual
Registration status with the Regulator	Information Officer registered

All PAIA requests must be directed to the Information Officer using the process described in section 9 of this manual. Requests relating to personal information under POPIA (access, correction, deletion, objection, withdrawal of consent or a complaint) may be submitted to the same Information Officer, or through the data-rights request form on the website.

5. Guide on how to use PAIA

The Information Regulator (South Africa) has published a Guide, in terms of section 10 of PAIA, explaining how to exercise a right under the Act. The Guide is available free of charge from the Regulator, and we do not republish or host our own copy of it.

- Information Regulator PAIA resources: <https://inforegulator.org.za/paia/>
- Prescribed PAIA forms: <https://inforegulator.org.za/paia-forms/>
- Information Regulator website: <https://inforegulator.org.za/>

A copy of the Guide may also be requested from the Regulator directly at enquiries@inforegulator.org.za or +27 10 023 5200.

6. Records held by Lifestyle Calculator

The following categories of records may be held. Listing a category does not mean that a record in that category will be released; access remains subject to PAIA.

A. Corporate and administrative records

- company registration and governance records;
- internal policies, procedures and compliance records;
- contracts and supplier or service-provider agreements;
- general business correspondence;
- operational records relating to the running of the platform.

B. Financial records

- accounting records;
- invoices and payment records;
- annual financial statements;
- tax records;
- records of business transactions.

C. Human resources records

- **[REQUIRED: CONFIRM WHETHER LIFESTYLE CALCULATOR HAS EMPLOYEES OR CONTRACTORS AND, IF SO, WHICH HUMAN RESOURCES RECORDS ARE HELD.]**

D. User and account records

- registration details (first name, surname, email address and, where the user chooses to supply them, mobile number, city and province);
- account and profile settings, including date of birth or age, household status and dependants where entered;
- email verification and authentication records held by our authentication provider;
- sign-in and session activity records;
- email and communication preferences, including marketing consent;
- support requests, support ticket messages and related correspondence;
- legal acceptance records (which policy version was accepted, and when).

E. User financial modelling information

- income items captured by the user;
- expense items captured by the user;
- debt and liability information, including balances, interest rates and repayments;
- asset information, including property details entered by the user;
- savings accounts and investment information;
- financial goals and target retirement information;

- modelling assumptions and scenario inputs;
- calculated results, scores, projections and saved calculation snapshots;
- budget documents or spreadsheets that a user chooses to import.

F. Financial Help and lead records

- financial help requests submitted through the platform;
- the contact details supplied with the request;
- the selected help category and any message provided;
- preferred contact method;
- lead status and internal workflow notes;
- consent records, including the consent wording and the date and time consent was given;
- communications relating to the request;
- partner or provider matching information, only once a partner network is operational and a partner has actually been assigned.

G. Technical, analytics and security records

- anonymous, hashed session and visitor identifiers;
- device type and browser information;
- pages viewed and calculator events (for example that a calculation was completed);
- traffic source, referring website and campaign / UTM information;
- aggregate guest-usage counters, which are not linked to an identified person;
- application error and diagnostic logs;
- rate-limiting records, which store a hashed fingerprint rather than a raw IP address;
- administrator audit logs recording administrative actions;
- email delivery and activity logs.

Website analytics on this platform are first-party and anonymous: visitor and session identifiers are hashed and no financial figures or account identifiers are recorded in the analytics records.

7. Records automatically available

The following records are published on the website and are available without a PAIA request, free of charge, and without needing to register or sign in:

- this PAIA Manual;
- the Privacy Policy and POPIA / Privacy Notice;
- the Terms & Conditions and Website Terms of Use;
- the Cookie Policy and the financial, risk and website disclaimers;
- public educational and product information describing what the calculator does;
- public contact information and the Information Officer contact page.

Records containing personal information, confidential business information, third-party information or internal operational information are not automatically available and must be requested in terms of PAIA.

8. Records available on request

Records that are not automatically available may be requested in terms of PAIA. Access is not automatic and is subject to:

- the requirements and procedures of PAIA;
- the mandatory and discretionary grounds for refusal in Chapter 4 of PAIA;
- the protection of third-party information;
- the protection of personal information under POPIA;
- contractual and business confidentiality;

- legal professional privilege;
- commercial confidentiality and trade secrets;
- any other applicable legal restriction.

9. Requesting access to records

To request access to a record, a requester should:

1. Identify the record, or the category of records, being requested.
2. Provide enough detail for Lifestyle Calculator to identify the record.
3. Complete the prescribed PAIA request form (Form 02: Request for Access to Record, Regulation 7).
4. Provide full contact details, including a postal or email address in South Africa, and the form of access required.
5. State the right that is being exercised or protected, and explain why the record is required to exercise or protect that right.
6. Attach proof of identity and, where the request is made on behalf of another person, proof of authority to act.
7. Submit the completed form to the Information Officer at privacy@mylifestylecalc.com.
8. Pay any prescribed fee that becomes payable, once the requester has been informed of it.

The current prescribed form is published by the Information Regulator and can be downloaded from <https://infoeregulator.org.za/wp-content/uploads/2020/07/InfoRegSA-PAIA-Form02-Reg7.pdf>. A request may also be started using the PAIA request form on this website, which records the request in our PAIA register and routes it to the Information Officer; the prescribed form and supporting documents remain required.

10. Fees

PAIA and its regulations allow a private body to charge a prescribed request fee and prescribed access fees for the reproduction, preparation and, where applicable, postage of records.

Where a fee is payable, the requester will be informed in writing of the amount payable, calculated in accordance with the applicable prescribed tariff, before the record is made available, and may lodge an internal or other remedy in respect of that decision as the Act allows. Where a request relates to a person's own personal information, the fee position provided for in the Act and its regulations applies.

Lifestyle Calculator does not publish its own invented tariff. The prescribed fees published in terms of PAIA apply.

11. Timeframes

A decision on a request must ordinarily be made, and the requester notified, within 30 days of receipt of the request. That period may be extended in the circumstances permitted by PAIA, in which case the requester will be notified in writing of the extension and the reasons for it.

Where a request affects a third party, the Act's third-party notification and representation periods apply before a decision is made. Where the record requested is required for the protection of the life or physical safety of a person, PAIA provides for a shorter response period.

The periods and procedures set out in PAIA and its regulations, as amended from time to time, are the authoritative source. Nothing in this manual shortens, extends or replaces them.

12. Grounds for refusal

Access to a record may be refused, in whole or in part, where PAIA permits or requires refusal. Grounds include:

- protection of the personal information of a third party;
- protection of commercial information of a third party or of Lifestyle Calculator;
- protection of confidential information supplied in confidence;
- protection of trade secrets and other commercially sensitive information;
- records protected by legal professional privilege;
- protection of the safety of individuals and the security of property, systems or information;
- records relating to actual or contemplated legal proceedings;
- requests that are manifestly frivolous or vexatious, or that would involve a substantial and unreasonable diversion of resources;
- any other ground provided for in Chapter 4 of PAIA or in other applicable law.

This list is a summary and not an exhaustive legal opinion. The applicable provisions of PAIA determine whether access may or must be refused, and whether the public-interest override in the Act applies.

13. Third-party information

Where a requested record contains information relating to a third party, the notification, representation and decision procedures in PAIA apply. Lifestyle Calculator will take the steps required by law before releasing information that relates to, or was supplied by, a third party, including notifying that third party where the Act requires it and allowing the third party to make representations.

Another user's personal information and another user's financial modelling information are never released merely because a request has been submitted.

14. POPIA and personal information

PAIA deals with access to records. POPIA deals with how personal information is processed and protected. The two Acts are related but separate, and a request under one is not automatically a request under the other. This manual includes the information about the processing of personal information that is relevant to a PAIA manual; the full detail is set out in the Privacy Policy and POPIA Notice on the website.

Categories of personal information actually processed by the platform include:

- identifying information: first name, surname, preferred name and, where supplied, date of birth or age;
- contact information: email address and, where supplied, mobile number, alternative contact number, city, province and address details;
- account information: sign-in credentials held by our authentication provider, verification status, subscription plan and communication preferences;
- financial modelling information entered by the user: income, expenses, debts, assets, property details, savings, investments, goals and the results calculated from them;
- lead information: the details submitted with a Financial Help request, including the selected category, message, preferred contact method and consent record;
- communication records: support requests, ticket messages, privacy and PAIA requests, and email activity;
- technical and usage information: device and browser information, hashed session and visitor identifiers, pages viewed, calculator events, traffic source and campaign information, and security and audit logs.

The platform does not require or invite special personal information as defined in POPIA (such as health, biometric, religious, political or trade-union information), and does not knowingly collect the personal information of children. Users are asked not to submit information of that nature through free-text fields.

15. Purposes of processing

Personal information is processed for the following purposes:

- creating, verifying and managing user accounts;
- providing the calculator and its modelling functionality;
- saving a user's own figures, scenarios and calculation history;
- producing results, scores, projections and the Improve recommendations;
- providing the Financial Help / lead request functionality;
- responding to support requests, complaints, privacy requests and PAIA requests;
- security, abuse prevention, rate limiting and fraud prevention;
- anonymous, aggregate analytics used to understand and improve the platform;
- sending service, account and journey communications, and marketing communications only where the user has agreed to receive them;
- complying with legal, regulatory and record-keeping obligations.

16. Recipients of personal information

Personal information may be made available to the following categories of recipient, in each case only to the extent necessary:

- technology and hosting service providers that operate the website and its server-side logic;
- the database and authentication provider that stores account and financial records;
- the transactional email provider used to send account, support and journey emails;
- the AI document-reading service used only when a user chooses to import a budget spreadsheet or photograph;
- first-party analytics and error-monitoring services operated on our behalf;
- professional advisers, such as attorneys, auditors or accountants, where required;
- regulators, courts or law-enforcement authorities where disclosure is required by law;
- financial or lifestyle partners, only once a partner network is operational, only with the user's consent, and only where the disclosure is lawful.

The Financial Help partner network is still being built. No user information has been shared with a financial partner, and no partner has been matched to any request. Information will only be shared with a partner in accordance with the applicable privacy notice, the user's consent and the law.

The service providers currently recorded in our operator register are:

Service	Provider	Purpose	Processing location
Application hosting	Lovable / Cloudflare	Serving the website and running server-side application logic	Global edge network (multi-region)
Database and authentication	Supabase	Storing account, profile and financial records; authenticating sign-in	AWS eu-west-1 (Ireland, European Union)
Cloud infrastructure (used by our database provider)	Amazon Web Services (eu-west-1, Ireland)	Underlying compute and storage for the hosted database and authentication service	AWS eu-west-1 (Ireland, European Union)

Service	Provider	Purpose	Processing location
Transactional and journey email	Resend (notify.mylifestylealc.com)	Sending account, support and journey emails	European Union / United States
AI document reading	Lovable AI Gateway (Google Gemini)	Reading budget spreadsheets and budget photographs you choose to import	United States / European Union
Financial Help providers	Providers listed in the Admin Console	Contacting you about the assistance you specifically requested	South Africa
Error monitoring	Lovable platform diagnostics	Detecting and diagnosing application errors	Global (Lovable platform, multi-region)

17. Cross-border transfers

Some of the service providers listed in section 16 process information outside South Africa, in the locations recorded in that table. Where personal information is processed outside South Africa, section 72 of POPIA applies and we rely on the operator arrangements recorded in our register.

[REQUIRED: CONFIRM THE SECTION 72 BASIS FOR EACH CROSS-BORDER TRANSFER, AND THAT EACH OPERATOR AGREEMENT IS SIGNED, BEFORE FINAL PUBLICATION.]

18. Information security

Lifestyle Calculator implements reasonable technical and organisational measures designed to protect personal information against loss, damage, unauthorised access, interference, modification, disclosure or destruction.

Measures actually implemented on the platform include:

- encrypted connections (HTTPS) between the browser and the platform;
- row-level access rules in the database so that a user's financial records are only readable by that user;
- authentication managed by a specialist authentication provider, with email verification required;
- multi-factor authentication required for administrator accounts;
- audit logging of administrative actions;
- rate limiting on public forms, using a hashed fingerprint rather than a stored raw IP address;
- separation of anonymous analytics from account and financial data.

Lifestyle Calculator does not claim any security certification, accreditation or third-party audit standard. No system can be guaranteed to be completely secure.

19. Retention

Records and personal information are retained only for as long as is reasonably necessary for the purposes for which they were collected, unless a longer retention period is required or permitted by law. The retention periods currently configured by the business are:

- Account and financial modelling records: 60 months after the account is closed or becomes inactive, unless a longer period is required or permitted by law.
- Support and enquiry records: 60 months.
- Financial Help / lead records: 36 months.
- Website analytics records: 400 days, after which they are automatically purged.

- Guest (no-account) calculator activity: held only in the visitor's own browser and expires within 24 hours; anonymous usage counters expire automatically.

Records are kept only for as long as reasonably necessary for the service, account administration, legitimate operational purposes and legal or regulatory requirements.

A user may delete their information through the platform or by contacting the Information Officer, subject to any records we are legally required to keep.

20. Data subject rights

Subject to POPIA and other applicable law, a data subject may:

- request access to the personal information we hold about them;
- request that inaccurate, irrelevant, excessive, out-of-date, incomplete, misleading or unlawfully obtained information be corrected or deleted;
- request deletion of personal information where we are no longer authorised to retain it;
- object, on reasonable grounds, to the processing of their personal information in the circumstances the Act allows;
- withdraw consent where processing is based on consent, without affecting processing already carried out lawfully;
- object to the use of their personal information for direct marketing, and unsubscribe at any time;
- lodge a complaint with us, and with the Information Regulator.

These requests can be submitted through the data-rights request form on the website, or directly to the Information Officer. The Privacy Policy and POPIA Notice explain each right in more detail.

21. Information Regulator and remedies

A requester who is aggrieved by a decision — including a refusal of access, a decision on fees, a decision to extend the response period, or a failure to respond — may apply to a court for appropriate relief in terms of PAIA, and may lodge a complaint with the Information Regulator on the prescribed form.

Item	Detail
Regulator	Information Regulator (South Africa)
Website	https://infoeregulator.org.za/
Address	27 Stiemens Street, Braamfontein, Johannesburg, 2001 (P.O. Box 31533, Braamfontein, Johannesburg, 2017)
Telephone	+27 10 023 5200
PAIA complaints	PAIAComplaints@infoeregulator.org.za
POPIA complaints	POPIAComplaints@infoeregulator.org.za
General enquiries	enquiries@infoeregulator.org.za

These are the Regulator's published details. Please confirm them against the Regulator's website, which is the authoritative source, before submitting a complaint.

22. Categories of records that may be requested

Record category	Examples	Automatically available?	Request required?
Published policies and website content	PAIA Manual, Privacy Policy, Terms & Conditions, disclaimers, educational content	Yes	No
Corporate and administrative records	Registration documents, internal policies, contracts, supplier records	No	Yes
Financial records	Accounting records, invoices, financial statements, tax records	No	Yes
Human resources records	[REQUIRED: CONFIRM WHETHER ANY HUMAN RESOURCES RECORDS ARE HELD]	No	Yes
A user's own account records	Profile details, verification status, preferences, support history	Partly — visible in the user's own account	Yes, for anything not shown in the account
A user's own financial modelling records	Income, expenses, debts, assets, savings, goals, results and snapshots	Partly — visible in the user's own account	Yes, for anything not shown in the account
Financial Help / lead records	Request details, category, consent record, status history	Partly — the user's own requests are shown in the app	Yes
Technical, analytics and security records	Anonymous session and usage records, error logs, audit logs	No	Yes, subject to the grounds for refusal
Third-party records	Records containing another person's or business's information	No	Yes, subject to the third-party procedures in PAIA

23. Updates to this manual

This manual is reviewed periodically and updated whenever there is a material change to the business, the records held, the Information Officer, the way personal information is processed, or the applicable law. Superseded versions are retained in our internal compliance records.

Item	Detail
Version	1.0
Effective date	[REQUIRED: INSERT EFFECTIVE DATE]
Last reviewed / updated	[REQUIRED: INSERT LAST UPDATED DATE]
Next review	[REQUIRED: INSERT NEXT REVIEW DATE]

24. Disclaimer

This PAIA Manual is intended to provide information about access to records held by Lifestyle Calculator. It does not replace the Promotion of Access to Information Act, the Protection of Personal Information Act, applicable regulations, or other applicable law. It is not legal advice.

The publication of this manual does not mean that Lifestyle Calculator is certified, accredited or approved by any regulator, and it does not constitute a representation that every applicable legal requirement has been met.