

LIGHTLIFE HEALTH SOLUTION

PAIA MANUAL

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

LightLife Health Solution (Pty) Ltd
Registration number: 2024/077223/07

Date of compilation: 8 September 2026
Review date: September 2027, or earlier if required

1. Acronyms and definitions

Term	Meaning
CEO	Chief Executive 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)

2. Purpose of this Manual

This Manual explains the records held by LightLife Health Solution (Pty) Ltd ("LightLife"), which records may be accessed without a formal request, and how a person may request access to another record under PAIA. It also summarises how LightLife processes and protects personal information under POPIA.

A requester seeking a record of a private body must identify the right that they seek to exercise or protect, explain why the record is required for that purpose, comply with PAIA's procedural requirements, and ensure that no lawful ground of refusal applies.

3. Company and Information Officer details

Item	Details
Registered body	LightLife Health Solution (Pty) Ltd
Registration number	2024/077223/07
Information Officer	Marc Pierre Yves Friederich, Chief Executive Officer
Telephone	083 650 5475
Email	marc@lightlifehealthsolution.com
Website	https://lightlifehealthsolution.com
Physical and postal address	59 Strubens Road, Observatory, Cape Town, 7925, Western Cape, South Africa
Deputy Information Officer	None appointed

4. The PAIA Guide

The Information Regulator has published a Guide explaining PAIA and POPIA, how to request access to records, available remedies, applicable fees and how to lodge a complaint. The Guide is available in the official languages and in braille.

The Guide and prescribed forms are available from the Information Regulator at <https://inforegulator.org.za/paia/> or on request from LightLife's Information Officer.

Information Regulator contact details: Woodmead North Office Park, 54 Maxwell Drive, Woodmead, Johannesburg, 2191; telephone 010 023 5200; toll-free 0800 017 160; email enquiries@inforegulator.org.za.

5. Records available without a formal PAIA request

The following public records may be accessed directly from LightLife's website or requested by email, without submitting Form 2:

Category	Examples and access
Company information	Public contact details, business description and Information Officer details; website or email
Legal notices	Privacy and POPIA Notice, Terms and Conditions, refund terms and this PAIA Manual; website or email
Products and services	Published descriptions, prices, programme information, FAQs and booking information; website
Published content	Public articles, recipes, newsletters, social-media posts and free resources; website or relevant channel

This voluntary availability does not waive any intellectual-property rights, contractual restrictions, confidentiality protections or grounds of refusal under PAIA.

6. Records available under other legislation

LightLife may hold records required by the following legislation, to the extent applicable to its activities:

Legislation	Typical records
Companies Act 71 of 2008	Corporate, director, registration and statutory company records
Income Tax Act 58 of 1962 and Tax Administration Act 28 of 2011	Tax, accounting and supporting financial records
Value-Added Tax Act 89 of 1991	VAT records, if LightLife is registered for VAT
Consumer Protection Act 68 of 2008	Customer, product, service, complaint and transaction records
Electronic Communications and Transactions Act 25 of 2002	Electronic transactions, website and communication records
POPIA and PAIA	Privacy, consent, access-request, security and compliance records
Copyright Act 98 of 1978	Copyright and intellectual-property records
Employment and labour legislation	Employment records, if and to the extent applicable

7. Subjects and categories of records held

Subject	Categories of records
Corporate and governance	CIPC records, incorporation documents, resolutions, contracts, policies and compliance records
Finance and tax	Invoices, receipts, bank and payment confirmations, accounting, tax and transaction records
Customers and prospects	Contact details, enquiries, bookings, purchases, consent records, correspondence and service history
Coaching and programmes	Registration, participation, assessments, goals, progress notes and voluntarily supplied health or wellbeing information
Products and intellectual property	E-books, recipes, meal plans, courses, programmes, designs, manuscripts, licences and copyright records
Marketing and communications	Campaigns, newsletters, opt-ins, unsubscribe records, social-media content and analytics
Suppliers and operators	Contracts, contact details, invoices, service records and data-processing arrangements
Technology and security	Website, hosting, CRM, access logs, backups, incidents and security records
Personnel, where applicable	Contracts, payroll, qualifications, leave, performance and statutory employment records

8. How to request access to a record

A requester must use the prescribed Form 2: Request for Access to Record and submit it to LightLife's Information Officer at the contact details in section 3.

1. Download Form 2 from <https://inforegulator.org.za/paia/> or request a copy from the Information Officer.
2. Describe the requested record sufficiently to enable LightLife to identify it.
3. Identify the right to be exercised or protected and explain why the record is required for that purpose.
4. State the preferred form and manner of access and provide complete contact details.
5. Attach proof of identity. If acting for another person, attach proof of authority.
6. Submit the signed form by email, post or delivery to the Information Officer.

LightLife will process the request within the periods prescribed by PAIA. A request may be refused on a ground permitted by PAIA, including protection of privacy, confidential commercial information, safety, legally privileged records, intellectual property or records whose disclosure is prohibited by law.

9. Fees and decisions

Any request fee, access fee, deposit or reproduction fee will be determined according to the current PAIA Regulations. LightLife will notify the requester if a fee is payable before processing or providing access. No fee is charged merely to confirm whether LightLife holds personal information about the requester under section 23(1)(a) of POPIA.

The requester will be notified in writing whether access is granted or refused. If refused, the notice will state the applicable reason and available remedies, subject to PAIA.

10. Processing of personal information

10.1 Purposes

LightLife processes personal information to respond to enquiries; deliver resources, products and services; manage bookings, payments and programme participation; provide coaching and customer support; maintain consent and communication preferences; improve its websites and services; protect its systems; and comply with contractual, accounting, tax and legal obligations. Direct marketing is sent only where consent or another lawful basis permits it.

10.2 Data subjects and information

Data subjects	Information that may be processed
Customers, clients and prospects	Identity and contact information, enquiries, bookings, purchases, communication preferences and correspondence
Programme and coaching participants	Contact information, goals, assessments, progress information and voluntarily supplied health or wellbeing information
Website visitors and subscribers	Contact information, consent records, device, cookie, analytics and website-use information
Suppliers, contractors and partners	Identity, business, contact, contract, invoice, banking and performance information
Personnel and applicants, where applicable	Identity, contact, employment, qualification, payroll and statutory information

10.3 Recipients

Personal information may be supplied, only where necessary and lawful, to hosting and technology providers; customer-relationship, form, email and messaging providers; payment and ecommerce providers; booking and course platforms; professional advisers; accountants; delivery or fulfilment providers; regulators, courts and public authorities; and other recipients authorised by the data subject.

10.4 Cross-border processing

Some cloud, website, CRM, messaging, ecommerce, payment and course providers may process or store information in the United States, European Economic Area or other jurisdictions in which those providers operate. LightLife takes reasonably practicable steps to ensure that cross-border transfers comply with section 72 of POPIA, including appropriate contractual, legal or consent-based safeguards.

10.5 Security measures

LightLife applies reasonable and appropriate safeguards, including access controls, strong passwords, restricted access, secure and reputable service providers, device and account security, backups, software updates, confidentiality measures, data minimisation, retention controls, and incident-response and breach-notification procedures. Safeguards are reviewed in light of the sensitivity of the information and available technology.

11. Availability and updating of this Manual

This Manual is available free of charge on <https://lightlifehealthsolution.com>, for inspection at LightLife's physical address during normal business hours by prior appointment, from the Information Officer upon request, and

from the Information Regulator where applicable. Fees permitted by law may apply to physical copies or other forms of access.

The Information Officer will review this Manual regularly and update it when LightLife's activities, records, systems or legal obligations materially change.

12. Complaints and remedies

A requester who is dissatisfied with a decision may use the remedies available under PAIA, including lodging a complaint with the Information Regulator or applying to a competent court, subject to the applicable requirements and time periods.

PAIA complaints: PAIAComplaints@inforegulator.org.za | Website: <https://inforegulator.org.za/complaints/> | Telephone: 010 023 5200

Issue and approval

Issued for and on behalf of LightLife Health Solution (Pty) Ltd.

A handwritten signature in blue ink, reading "Friederich", with a long horizontal line above it.

Marc Pierre Yves Friederich
Chief Executive Officer and Information Officer
Date: 8 September 2026