



HELDERSTACK (PTY) LTD

Promotion of Access to Information Manual

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

Private body:	HelderStack (Pty) Ltd	Registration number:	2025/373269/07
Website:	helderstack.dev	Version:	1.2
Date of compilation:	27 August 2026	Date of issue:	27 August 2026
Scope:	Company-wide cloud applications	Supersedes:	Version 1.1

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Important: This manual describes records that may be held. It does not mean that every record is automatically available. Access is considered under PAIA and may be refused or limited where a statutory ground applies, including privacy, confidentiality, legal privilege, safety and commercial information.

1. Acronyms and Abbreviations

Term	Meaning
DIO	Deputy Information Officer
ECTA	Electronic Communications and Transactions Act 25 of 2002
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
HelderStack services	Cloud application development, hosting, operation, support and related services provided by HelderStack

2. Purpose of this Manual

This manual helps members of the public to:

- 1 understand the subjects and categories of records that HelderStack holds;
- 2 identify records that may be available without a formal PAIA request;
- 3 understand how to request access to a record and contact the Information Officer;
- 4 obtain the Regulator's Guide on how to use PAIA;
- 5 understand applicable record-keeping legislation; and
- 6 understand personal-information purposes, data subjects, recipients, transborder processing and general safeguards.

3. Key Contact Details

Item	Details
Private body	HelderStack (Pty) Ltd
Registration number	2025/373269/07
Head and Information Officer	Frederick Adriaan Henning
Capacity	Owner, Director and registered Information Officer
Deputy Information Officer	None currently designated
Telephone	+27 79 872 6850
Fax	Not applicable
PAIA and Information Officer email	info@helderstack.dev
Postal address	20 Briza Street, Somerset West, Western Cape, South Africa
Principal place of business	20 Briza Street, Somerset West, Western Cape, South Africa
Website	https://helderstack.dev/
Inspection hours	Monday to Friday, 09:00 to 17:00, excluding public holidays, by prior appointment

4. Guide on How to Use PAIA

The Regulator has published a Guide to assist a person who wishes to exercise a right under PAIA or POPIA. It explains the Acts, forms, fees, request procedures, remedies and contact information. The Guide is available in the official languages and in accessible formats made available by the Regulator.

- Request the Guide from the Information Officer.
- Use the Regulator's PAIA resources at <https://infoeregulator.org.za/paia/>.
- Use the Regulator's published contact channels at <https://infoeregulator.org.za/contact-us/>.

5. How to Request Access to a Record

Use the prescribed Form 2. Send the completed request to info@helderstack.dev. The current form is available from the Regulator's PAIA resources page.

- 1 Identify each requested record with enough detail to locate it, including relevant dates, people, organisation, account, competition, event, document or transaction references where known.
- 2 Provide sufficient information to identify the requester and state the preferred form of access.
- 3 Identify the right to be exercised or protected and explain why the record is required for that purpose.
- 4 If acting for another person, including a child, athlete, guardian, customer or organisation, provide proof of identity, authority and capacity.
- 5 Provide contact details and the preferred method for receiving the decision.

5.1 Identity, authority and client-controlled records

HelderStack may request reasonable proof of identity or authority before disclosing a record. Where a request concerns operational records for which a customer organisation or sports club determines the purpose and use, HelderStack may refer the requester to that organisation or coordinate the response with it while applying PAIA and POPIA. Guardian or competent-person authority may need to be verified for records concerning a minor.

5.2 Fees, decision and remedies

Prescribed request, search, preparation, reproduction and delivery fees may apply. HelderStack will ordinarily decide a complete request within 30 days, subject to a permitted extension. Access may be refused where PAIA requires or permits refusal, and severable portions will be considered. A private body has no compulsory internal PAIA appeal. A requester may use the prescribed complaint process or seek relief from a court.

6. Records Available Without a Formal Request

The following records may be accessed without Form 2 when current and made public or approved for release. HelderStack has not published a separate voluntary notice under section 52 of PAIA.

Category	Examples	How to access
Legal and privacy notices	This manual, public privacy policies, platform notices, terms and cookie notices	Relevant website or request to the IO
Public company information	Company name, registration number, IO contact details and service descriptions	HelderStack website or request to the IO
Public marketing and support content	Public guides, contact information and published social content	Relevant public page or channel

Category	Examples	How to access
Deliberately shared application content	Customer-published catalogue, competition or event information shared through a public link	Relevant public link, subject to the publishing organisation's settings

7. Records Available Under Other Legislation

HelderStack may hold records created, retained or made available under the following South African legislation where applicable. The list is not exhaustive and does not make every listed record publicly available.

Record category	Applicable legislation
Company registration, governance and statutory corporate records	Companies Act 71 of 2008
Tax, VAT, accounting, payment and transaction records	Income Tax Act 58 of 1962; Value-Added Tax Act 89 of 1991; Tax Administration Act 28 of 2011
Access-to-information records and this manual	Promotion of Access to Information Act 2 of 2000
Personal-information, security and rights-request records	Protection of Personal Information Act 4 of 2013
Electronic communications, online services and transactions	Electronic Communications and Transactions Act 25 of 2002
Consumer services, prices, payments, credits, refunds and complaints where applicable	Consumer Protection Act 68 of 2008
Security incidents and unlawful access where applicable	Cybercrimes Act 19 of 2020; Protection of Personal Information Act 4 of 2013
Software, content, brands and intellectual property	Copyright Act 98 of 1978; Trade Marks Act 194 of 1993

8. Subjects and Categories of Records Held

The service-area mapping below identifies which record categories are associated with each HelderStack service. A category is processed only when the relevant service or feature is used; it should not be read as meaning that every HelderStack service collects every category.

8.1 Service-to-record mapping

Service area	Main data subjects	Main records
Public website and contact	Website visitors and prospects	Enquiries, names, organisation and contact details, correspondence, privacy choices, technical request, IP address, device, browser and public-site security records
Commercial workflow application	Customer organisations and users; commercial customers; suppliers; sales representatives; quote, invoice and document recipients	Accounts and permissions; contacts; products, pricing and measurements; catalogues; quotes, invoices, purchasing, jobs, manufacturing, inventory, comments, reports, exports, communications and documents
Customer-facing catalogue	Catalogue users, customer contacts and quote recipients	Accounts and contact or delivery details; baskets; product measurements and choices; pricing; quote requests; references; comments; documents; communications and session or security records
Sports-club dashboard	Club owners, coaches and staff; federation contacts; adult and minor athletes; parents, guardians and competent persons	Club, federation, user and access records; athlete identity, date of birth, age and gender; guardian relationships and contacts; memberships and squads; performance results and times; qualifying outcomes; competitions, events and entries; uploads and exports
Athlete and guardian portal	Adult and minor athletes; parents, guardians and competent persons	Invited accounts, authentication and authorised relationships; athlete and membership information; performance results, times and eligibility; competition or event discovery and entries; payment attempts, fees, credits, adjustments, history, reminders and confirmations
Public and shared application links	Authorised publishing organisations; catalogue users; athletes or guardians where applicable; public-link viewers	Deliberately published catalogue, competition or event content; share-link identifiers and status; request, IP address, device, browser and security records
Shared platform operations	All relevant users and correspondents	Email delivery; files and imports; private upload, quarantine and malware-scan records; authorised AI-assisted rules extraction; integrations, callbacks and webhooks; logs, audits, incidents, backups, recovery, support and rights-request records

8.2 Detailed record categories

Subject	Categories of records
Corporate governance	Incorporation, ownership, director, statutory, policy, registration, Information Officer and compliance records
Finance and taxation	Accounting, banking, expense, tax, VAT, invoice, payment, subscription, platform-fee, budget and financial-reporting records
Customers and prospects	Enquiries, demo requests, contact and company details, agreements, support, billing, service administration and relationship records
Accounts and access	Registration, invitations, authentication, password resets, multi-factor authentication, sessions, roles, permissions, organisation or club access, and history
Commercial application records	Customers, suppliers, sales representatives, catalogues, inventory, measurements, options, products, pricing, quotes, invoices, purchase orders, receipts, jobs, stock, barcodes, reports, exports, comments and documents
Catalogues and customer journeys	Published business and product content, media, customer accounts, baskets, product measurements and choices, quote requests, references, comments and communications
Manufacturing and inventory	Bills of materials, assembly parts, job cards, labels, reservations, receipts, issues, returns, stocktakes, movements, work in progress and stock values
Sports clubs, athletes and guardians	Club and federation information; adult and minor athlete identity; date of birth, age and gender; guardian or competent-person relationship and contact; memberships, invitations, squads and access records
Sports performance and participation	Performance results and source information; times and conversions; qualifying standards and outcomes; competitions, events, entries, selected events, deadlines, eligibility and entry history
Payments, credits and refunds	Checkout attempts, provider and merchant references, event charges, platform fees, payment status, callbacks, confirmation, credit accounts, adjustments, ledger movements and manual refund records; HelderStack does not ordinarily store payment-card details
Files, imports and generated records	Uploaded media, documents, event files, top-times files, rules PDFs, generated PDFs, labels, parsed or staged records, file references and processing errors
AI-assisted processing	Authorised rules-document extraction requests, response identifiers, extracted standards, human review status, errors and audit records
Public and shared content	Deliberately published catalogue, competition or event link content, link identifiers, publication status and related access or security records
Communications	Email content and delivery records, invitations, reminders, confirmations, support enquiries, notices, complaints and service messages
Integrations and external services	Authorisation status, connection identifiers, mappings, configuration, provider request and response audits, webhooks and documents exchanged at an authorised user's direction
Uploads, security and operations	Upload audit records, filenames, user and organisation references, IP addresses, object and version references, quarantine and malware-scan decisions, requests, devices, browsers, logs, incidents, backups, recovery and support
Website and marketing	Public content, enquiries, consent choices, permitted visitor analytics, campaigns, referrals, social content and public-site security records
Service providers, advisers and legal matters	Due diligence, agreements, service descriptions, contacts, invoices, rights requests, PAIA requests, disputes, legal advice, regulator correspondence and evidence
People records	Owner and director records. HelderStack has no employees at the issue date; this manual must be updated before employee processing begins

9. Processing of Personal Information

Role allocation: HelderStack is generally the responsible party for its public website, account administration, service security, support, platform billing and fees, legal obligations and its own commercial records. A customer business or sports club generally determines the purpose and use of its operational customer, supplier, catalogue, athlete, guardian, performance, competition, event and entry records; HelderStack generally acts as operator for those purposes. HelderStack may determine separate operational purposes for security, fraud prevention, support, audit and legal compliance. Actual roles depend on the facts and applicable agreements.

9.1 Purposes of processing

Surface or activity	Purposes
Public website and registration	Provide public information, answer enquiries, register or invite authorised users, deliver notices, protect the service, remember privacy choices and use optional measurement only where permitted
Commercial application dashboard	Administer organisations, users and permissions; manage products, quotes, invoices, purchasing, inventory, manufacturing, jobs, reports, documents, communications and authorised integrations
Customer-facing catalogue	Display customer-published product information; provide accounts, baskets, generated forms, measurements, choices, pricing, quote requests, documents and communications
Sports-club dashboard	Administer clubs, staff, athletes, guardians, memberships, invitations, squads, federations, rules, competitions, events, entries, performance results and times, qualifying outcomes, exports, payment configuration and uploads
Athlete and guardian portal	Authenticate invited users; manage authorised athlete relationships; display competitions or events, eligibility and performance results or times; submit or change entries; process payments and credit; provide history, reminders and confirmations
Payments and credits	Calculate event charges and platform fees, create and reconcile provider payment attempts, handle callbacks, keep immutable transaction and credit records, process adjustments and support permitted refunds
Public or shared links	Display only information deliberately published by an authorised customer or club through a catalogue, competition or event link, and protect or withdraw that sharing
Files, scanning and AI assistance	Receive authorised imports in private storage, quarantine and scan files, parse approved event or time files, extract rules from authorised PDFs with AI assistance, support human review and keep audit/error records
Cross-surface operations	Deliver emails and documents, store and back up authorised records, investigate errors and security events, maintain continuity, meet legal duties and assist verified rights requests

9.2 Categories of data subjects and information

Data-subject category	Personal information that may be processed
Website visitors and prospects	Name, organisation, email, enquiry details, consent choice, IP address, device, browser, referral, security and permitted analytics information
Customer organisations, owners and application users	Name, username, email, telephone, address, organisation, role, permissions, authentication, session, MFA, activity, support, audit and workflow information
Commercial customers, contacts, representatives and recipients	Contact and delivery details, assigned organisations, measurements and product choices, quotes, invoices, jobs, comments, references, documents, communications and activity
Suppliers and service-provider contacts	Names, contact details, addresses, registration and VAT details, supplied items, prices, purchase and receipt records, mappings, contracts, invoices and communications
Club owners, coaches, staff and federation contacts	Identity and contact details, club or federation, role, permissions, invitations, activity, configuration, support, audit and authorised operational information
Adult athletes	Name, date of birth, age, gender, contact or login information, club memberships, squads, performance results and times, qualifying or eligibility outcomes, competition or event entries, payments, credits, communications and audit history
Minor athletes	Name, date of birth, age, gender, club memberships, squads, performance results and times, qualifying or eligibility outcomes, competition or event entries, payment-linked records, communications and audit history, processed with the required child-information authorization
Parents, guardians and competent persons	Name, email, telephone, login and security information, relationship and authority records, linked athletes, club-specific contact information, entries, payments, credits, invitations and communications
Payers and merchant contacts	Identity and contact information, internal and provider references, status, amounts, fees, event count, payment timing, confirmation, credits, adjustments and refunds; no ordinary storage of payment-card details
Public-link viewers	Request, IP address, device, browser and security information; content viewed through a deliberately published catalogue, competition or event link
Advisers, regulators and correspondents	Names, contact details, professional or official capacity, correspondence, requests, decisions and supporting records
Owner and director	Identity, contact, governance, statutory, financial, tax, security and compliance information

Children's information: Where a service processes information about an athlete under 18, the responsible party, normally the relevant sports club, must ensure that the processing is permitted under POPIA. This will usually require consent from a parent or legal guardian. When acting as an operator, HelderStack processes this information on the sports club's instructions and applies appropriate access controls and security safeguards.

HelderStack's standard services do not ordinarily require health, medical, disability, injury, medication, biometric or criminal-behaviour information. A new legal, security, notice and prior-authorization assessment is required before such categories are intentionally introduced. Performance results, times and qualifying information are not described as health information without evidence, but are treated proportionately because they may relate to children and eligibility.

9.3 Recipients or categories of recipients

Information category	Recipients or recipient categories
Organisation and dashboard records	Authorised users of the relevant customer organisation or club according to roles, permissions and operational purpose
Commercial workflow records	Customers, suppliers, sales representatives, document recipients and other parties selected by an authorised user
Athlete, guardian, competition and performance records	Authorised club owners, coaches or staff; the relevant athlete or authorised guardian; competition, event or federation recipients selected by the club; and HelderStack support where necessary and authorised
Payment and credit records	The relevant athlete or guardian, authorised club users, payment service providers, the configured merchant recipient, HelderStack for platform-fee and operational purposes, and advisers or authorities where lawful
Public/shared information	Members of the public or signed-in users only where an authorised customer or club deliberately publishes or shares catalogue, competition or event information
Service and account information	Approved cloud hosting, database, storage, backup, email, security, content-delivery, queue, monitoring, support and communications providers acting under applicable terms
AI-assisted rules documents	An approved AI service and its authorised subprocessors where an administrator submits a document for rules extraction; outputs are subject to human review
Analytics and campaign information	Approved measurement providers only where the applicable choice and processing justification permit it
Integration information	An enabled integration provider and its authorised recipients at an authorised user's direction
Legal, compliance and incident information	Professional advisers, insurers, regulators, courts, law-enforcement bodies or other lawful recipients where permitted or required

9.4 Planned transborder flows

Primary application processing and storage are configured in South Africa. Email delivery may involve processing in the United Kingdom. Approved cloud, security, content-delivery, analytics, integration, AI, monitoring and support providers or their subprocessors may process limited service information in other countries. A configured region does not by itself establish every backup, telemetry, subprocessor or support location.

Transborder processing may include account and contact information, communications, transaction and support information, security metadata, permitted analytics, integration data, and authorised rules documents submitted for AI-assisted extraction. Where POPIA applies, HelderStack relies on a ground permitted by section 72, such as appropriate contractual or substantially similar legal protection, consent where valid, or a transfer necessary to perform or implement the requested service. Current country and safeguard information may be requested from the Information Officer.

9.5 General description of security safeguards

HelderStack applies risk-based safeguards intended to preserve confidentiality, integrity and availability. Depending on the record and service, these may include:

- organisation and club separation, role-based permissions, guardian relationship controls and least-privilege access;
- authentication controls, password protection, session controls and multi-factor authentication for specified privileged access;
- encrypted network connections, restricted private storage and controlled public sharing;
- file validation, private quarantine, malware scanning and fail-closed processing for registered upload workflows;
- authenticated payment and security callbacks, reconciliation, immutable or auditable payment and credit histories, and credential protection;
- human review of imported, parsed, qualifying and AI-assisted outputs before operational reliance where appropriate;
- backups, recovery controls, audit histories, monitoring and incident-response procedures;
- provider due diligence, written safeguards and section 72 transfer assessment where applicable; and
- periodic review as services, risks, providers, children-information processing and scale change.

Security measures are reviewed according to risk. This description is not a guarantee that every threat can be prevented and does not disclose confidential security configurations.

9.6 Retention and participation

Records are retained for the period needed for the stated purpose, customer or club instructions, legal and financial duties, security and dispute requirements, and approved backup schedules, subject to legal hold. Retention differs by record type and service. HelderStack assists responsible parties with verified requests for access, correction, deletion or destruction and objection where applicable. Identity, guardian authority, club membership and organisational responsibility are verified before action. Backup deletion may complete through the applicable expiry cycle. Current retention and request details may be obtained from the Information Officer.

10. Availability of this Manual

A current copy of this manual is available:

- 1 on <https://helderstack.dev/legal/helderstack-paia-manual.pdf>;
- 2 at HelderStack's principal place of business during the published hours, by prior appointment;
- 3 to any person on request, subject to a reasonable prescribed reproduction fee; and
- 4 to the Information Regulator on request.

The electronic PDF is available without charge. A reasonable prescribed reproduction or delivery fee may apply for a physical copy or another form of access.

11. Updating and Governance

The Information Officer will review this manual regularly and update it when material changes affect contact details, application record categories, purposes, data subjects, recipients, children-information processing, payments, public sharing, AI or other providers, transborder flows, security safeguards, law or request procedures.

Registered particulars will be checked whenever they change and at least annually. The approved version will be published on the HelderStack website, and superseded versions retained as controlled internal compliance records for an appropriate period.

12. Issue and Approval

This manual is issued by the head of HelderStack (Pty) Ltd and its registered Information Officer. Version 1.2 expands the company-wide record and personal-information descriptions to cover current commercial and sports-club application processing, including a service-to-record mapping.

Frederick Adriaan Henning

Owner, Director and Registered Information Officer

HelderStack (Pty) Ltd

Date: 27 August 2026

Electronically issued as version 1.2.

Appendix A. PAIA Request Checklist

Before sending a request, check that it includes:

- 1 the current prescribed Form 2;
- 2 the requester's full contact details and sufficient proof of identity;
- 3 a clear description of each requested record;
- 4 the right to be exercised or protected and why the record is required;
- 5 the preferred form of access and method for receiving the decision;
- 6 proof of authority where acting for another person or organisation; and
- 7 for a child's or athlete's record, proof of the requester relationship and authority where applicable.

Send the completed request to info@helderstack.dev. Do not include passwords, authentication secrets, payment credentials or unrelated personal information.

Appendix B. Official Sources

The following primary sources were checked when this manual was updated:

- Promotion of Access to Information Act 2 of 2000, as amended:
https://inforegulator.org.za/wp-content/uploads/2020/07/PROMOTION_OF_ACCESS_TO_INFORMATION_ACT-2_OF_2000.pdf
- Protection of Personal Information Act 4 of 2013: <https://www.justice.gov.za/legislation/acts/2013-004.pdf>
- Information Regulator PAIA resources, Guide, forms, templates, fees and complaints guidance: <https://inforegulator.org.za/paia/>
- Information Regulator private-body PAIA manual template:
<https://inforegulator.org.za/wp-content/uploads/2020/07/PAIA-Manual-Template-Private-Body.pdf>
- Information Regulator contact channels: <https://inforegulator.org.za/contact-us/>

Sources accessed: 27 August 2026.