

INNOVELOP

Manual prepared in terms of section 51 of the Promotion of Access to Information Act, 2000

(Act No. 2 of 2000) — “PAIA Manual”

incorporating the information required under section 51(1)(c) of PAIA read with the Protection of Personal Information Act, 2013 (Act No. 4 of 2013)

(A private body — sole proprietorship)

Information Regulator registration: 2026-024652

Version 1.0 · Date of compilation: 17 June 2026

1. Introduction & purpose

This manual is published by Innovelop (“the private body”, “we”, “us”, or “our”), a sole proprietorship operated by Etienne Holford, which develops and operates a range of browser- and mobile-based applications and games (collectively, “our apps”). Innovelop is a “private body” as defined in section 1 of PAIA and a “responsible party” as defined in section 1 of POPIA.

This manual is compiled in accordance with section 51 of the Promotion of Access to Information Act, 2000 (“PAIA”) and includes the information required by section 51(1)(c) of PAIA in respect of personal information processed by Innovelop under the Protection of Personal Information Act, 2013 (“POPIA”). Its purpose is to explain how a person may request access to records held by Innovelop, and to describe the records held.

No exemption. Since 1 January 2022 no private body is exempt from the obligation to compile a PAIA manual; this includes a sole proprietorship. This manual is published to meet that obligation.

This manual covers all apps operated by Innovelop, including (without limitation) HEIST, Inkwell, Bite Tonight, Heard, Parity, TaxSenseSA, and Tiny Terms. It will be made available on the Innovelop website and the websites or stores of the individual apps, at the principal place of business for inspection during normal business hours, and on request. It will be reviewed and updated at least every twelve (12) months or as necessary.

2. Particulars of the private body (s51(1)(a))

Name of private body	Innovelop
Type	Private body — sole proprietorship
Proprietor	Etienne Holford
Head of the body (PAIA)	Etienne Holford (as proprietor / head, per section 1 of PAIA)
Information Officer (POPIA)	Etienne Holford
Information Regulator registration	2026-024652 (registered 7 June 2026)

Information Officer appointment date	1 June 2026
Postal address	PostNet Suite 002, Private Bag X19, Durbanville, 7551, South Africa
Email	feedback@innovelop.org
Website	https://home.innovelop.org

3. The Guide on how to use PAIA (s10)

The Information Regulator has, in terms of section 10(1) of PAIA, compiled an official Guide on how to use PAIA, containing such information as may reasonably be required by a person wishing to exercise any right under PAIA and POPIA. The Guide is available in each official language.

A requester may obtain the Guide from the Information Regulator:

Information Regulator (South Africa)	
Postal address	P.O. Box 31533, Braamfontein, Johannesburg, 2017
Physical address	Woodmead North Office Park, 54 Maxwell Drive, Woodmead, Johannesburg, 2191
Telephone	010 023 5200 Toll free: 0800 017 160
Enquiries email	enquiries@inforegulator.org.za
PAIA complaints	PAIAComplaints@inforegulator.org.za
POPIA complaints	POPIAComplaints@inforegulator.org.za
Website	https://inforegulator.org.za

Requesters should confirm the Regulator's current contact details on its website, as these may change.

4. Records held & how to request access

4.1 Records available in terms of other legislation (s51(1)(a))

Certain records may be accessible in terms of, and subject to, other legislation rather than PAIA. These may include, where applicable:

- Companies Act, 71 of 2008 (to the extent applicable to the proprietor's activities)
- Income Tax Act, 58 of 1962, and the Tax Administration Act, 28 of 2011
- Value-Added Tax Act, 89 of 1991 (if registered)
- Protection of Personal Information Act, 4 of 2013
- Basic Conditions of Employment Act / Labour Relations Act (if employees are engaged)

Access in terms of other legislation is governed by that legislation and is not dealt with under this manual.

4.2 Records automatically available (s52 — voluntary)

The following information is made available without a formal PAIA request:

- This PAIA manual.
- The privacy policy / privacy disclosure for each app (in-app and on the website).
- Marketing and product information published on the websites and app stores.

4.3 Subjects and categories of records held (s51(1)(b)(iv))

Innovelop holds records in the following subject categories across its apps:

Subject	Categories of records held
User / player accounts & app data	Account email addresses; app and game progress, settings and ratings; entitlement (premium status); play-session/usage balances; consent records (version, timestamp, and the sign-up affirmation regarding age and, where applicable, parent/guardian consent).
Support & correspondence	Messages submitted via in-app contact forms and related email correspondence.
Business & financial	Tax and financial records; records relating to subscriptions/purchases (held in summary form — no payment-card data is held by Innovelop).
Service providers	Data Processing Agreements and related records for the processors used to operate the apps.
Governance & compliance	Information Officer registration; this manual; privacy and breach-response documentation.
Technical & development	Source code, configuration, and deployment records (these do not contain end-user personal information).

5. How to request access to a record (s53)

- A requester must use the prescribed form (Form 2 of the PAIA Regulations — “Request for Access to Record of Private Body”), available from the Information Regulator’s website.
- The completed form must be sent to the Information Officer at the address/email in section 2 above.
- The requester must provide sufficient particulars to enable Innovelop to identify the record and the requester, specify the form of access required, and specify a postal address or email in the Republic.
- The requester must state, if the request is in the interest of another person, the capacity in which the request is made.
- **Right of access is conditional:** access will be granted where the requester complies with the procedural requirements of PAIA and access is not refused on a ground set out in Chapter 4 of Part 3 of PAIA.
- If the request relates to personal information of the requester (a data subject) under POPIA, the relevant POPIA request mechanism may also apply.

5.1 Grounds for refusal

Access may be refused on the grounds set out in Chapter 4 of Part 3 of PAIA, including (without limitation): mandatory protection of the privacy of a third party who is a natural person; mandatory protection of commercial information of a third party; mandatory protection of confidential information of third parties; protection of the safety of individuals and property; records privileged from production in legal proceedings; and protection of the commercial activities of the body. Requesters will be notified of the decision and the reasons, and of their rights to appeal/complain.

5.2 Fees (s54)

Two fees may apply, as prescribed in the PAIA Regulations: a request fee (payable by every requester before the request is processed) and an access fee (covering reproduction, search and preparation time, and form of access). The Information Officer will notify the requester of any access fee payable before processing continues, and may require a deposit where preparation is expected to exceed the prescribed time. The current prescribed private body fees are:

Item	Amount
Request fee (payable by every requester)	R140.00
Photocopy / printed black & white copy, per A4 page or part thereof	R2.00
Printed copy of an A4-size page, per page or part thereof	R2.00
Copy in computer-readable form on a flash drive (requester provides)	R40.00
Copy in computer-readable form on CD (requester provides the CD)	R40.00
Copy in computer-readable form on CD (provided by Innovelop)	R60.00
Transcription of visual images, per A4 page	Outsourced — per service provider quotation
Copy of visual images	Outsourced — per service provider quotation
Transcription of an audio record, per A4 page	R24.00
Copy of an audio record on a flash drive (requester provides)	R40.00
Copy of an audio record on CD (requester provides the CD)	R40.00
Copy of an audio record on CD (provided by Innovelop)	R60.00
Search and preparation, per hour or part thereof (excluding the first hour)	R145.00
Maximum search and preparation fee	R435.00

Deposit (where search is expected to exceed 6 hours)	One-third of the access fee calculated for the request
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These amounts are set by the PAIA Regulations and may be updated from time to time; the figures above reflect the Information Regulator's published fee structure as at the compilation date of this manual.

6. Processing of personal information (s51(1)(c) / POPIA)

Innovelop is a responsible party under POPIA. The following describes the processing of personal information, to the extent required by section 51(1)(c) of PAIA. Fuller detail is in each app's privacy policy.

6.1 Purpose of processing

To create and authenticate user accounts; to save and synchronise progress and settings across devices; to manage entitlements (premium) and usage allowances; to record consent; to respond to support enquiries; and to meet legal and operational obligations.

6.2 Categories of data subjects and their personal information

Data subjects	Personal information
Users who create an account	Email address; app/game progress, settings and ratings; premium/entitlement status; usage balance; consent record (version, timestamp, and the sign-up affirmation regarding age and, where applicable, parent/guardian consent).
Users who contact support	Email address and the content of their message.
Service providers / contacts	Business contact details of processors and advisers.

6.3 Recipients / categories of recipients

Personal information is processed by the following operators (processors), each under a written Data Processing Agreement incorporating the EU Standard Contractual Clauses and, where applicable, the EU-US Data Privacy Framework. Not every processor is used by every app:

Processor	Role	Location
Supabase	Authentication & database	EU / USA
Cloudflare	Hosting & edge functions	Global edge network
Resend	Transactional email (login codes, contact form)	USA
RevenueCat	Subscription / purchase management	USA
GitHub	Source hosting & deployment (no end-user personal information)	USA

6.4 Planned transborder (cross-border) flows

Yes. Personal information is processed outside South Africa (in the USA and EU) by the processors listed above. These transfers are made under the safeguards in section 72 of POPIA, principally the Standard Contractual Clauses (and Data Privacy Framework where applicable) contained in the signed Data Processing Agreements, with user consent obtained as a further layer at sign-up.

6.5 Security measures (s51(1)(c)(iv))

Innovelop applies, and requires its processors to apply, appropriate technical and organisational measures to protect the confidentiality, integrity and availability of personal information. These include: secrets held only server-side (never in the client); row-level security on all database tables; encryption in transit and at rest by the processors; server-side enforcement of entitlements; an account-deletion mechanism; consent records; and a documented breach-response process aligned to section 22 of POPIA.

7. Remedies & complaints

A requester who is dissatisfied with a decision of the Information Officer (for example, a refusal of access) may, after exhausting any internal procedure:

- Lodge a complaint with the Information Regulator in terms of PAIA; or
- Apply to a court with jurisdiction in terms of section 78 of PAIA.

Data subjects who believe Innovelop has not complied with POPIA may also complain to the Information Regulator. Contact details are in section 3.

8. Availability of this manual

This manual is available: on the Innovelop website and the individual app websites; at the principal place of business for inspection during business hours; from the Information Officer on request (a copy fee may apply per the Regulations); and from the Information Regulator's website where lodged. It is available in English.

Compilation date: 17 June 2026 **Next review due:** 17 June 2027 (or sooner if circumstances change)

Etienne Holford

Head of the private body / Information Officer, Innovelop