DATASIMPLIFIED

PAIA MANUAL

Prepared in terms of section 51 of the Promotion of Access to Information Act 2 of 2000 (as amended), including the personal-information disclosures required by POPIA.

DataSimplified (Pty) Ltd

Registration number: 2016/476148/07

Version 1.0 | Issued 5 November 2026

Information Officer: Michael Hamilton, Managing Director

Covers corporate activities, consultancy services, HRSimplified and OffGrid Expeditions.

PUBLIC DOCUMENT | www.datasimplified.co.za

1. Purpose and scope

This manual describes the subjects on which DataSimplified (Pty) Ltd ("DataSimplified" or "the Company") holds records, the categories of records, how to request access under the Promotion of Access to Information Act (PAIA), and the Company's processing of personal information under the Protection of Personal Information Act (POPIA). It is a manual for the legal entity, not separate manuals for its individual brands.

DataSimplified provides software development, data and business intelligence consulting, technical services, and operates the HRSimplified and OffGrid Expeditions platforms. Access to any record remains subject to PAIA and other applicable laws, including confidentiality and data protection requirements.

2. Key contact details

Item	Details
Registered private body	DataSimplified (Pty) Ltd
Registration number	2016/476148/07
Information Officer	Michael Hamilton, Managing Director (registered with the Information Regulator)
Deputy Information Officer	None appointed
Physical / principal business address	44 Fuchsia Street, Durbanville, 7550, South Africa
Postal address	Same as physical address
Telephone	+27 (0) 87 378 1154
Information access email	info@datasimplified.co.za
Website	https://www.datasimplified.co.za

3. The Information Regulator's PAIA Guide

The Information Regulator makes available a Guide explaining how to use PAIA, the relevant forms, fees, remedies, access procedures and assistance available. The Guide may be accessed via https://inforegulator.org.za or requested from the Information Regulator. The Company will assist requesters to locate the Guide and the prescribed access request form.

4. Records available without a formal PAIA request

Publicly published information may be accessed directly from the applicable websites. Such records include the Company's corporate website information, published policies, public product descriptions, published HRSimplified information, published OffGrid Expeditions destination guides and journal content, and publicly approved marketplace profiles and listings.

The Company does not represent that it has published a formal notice of automatically available record categories under section 52 of PAIA. Any such notice, if adopted, will be described in an updated manual.

5. Records under other legislation

Depending on relevance to the Company's operations, records are maintained pursuant to the Companies Act 71 of 2008; Income Tax Act 58 of 1962; Tax Administration Act 28 of 2011; Value-Added Tax Act 89 of 1991 (where applicable); Basic Conditions of Employment Act 75 of 1997 and Labour Relations Act 66 of 1995 (where applicable); PAIA; POPIA; and applicable electronic communications and consumer-protection laws. This is a description of relevant legal record categories, not a representation that every statute listed applies to every Company activity.

6. Subjects and categories of records

6.1 Corporate, financial and administrative

- Company registration and governance records, corporate correspondence, contracts and supplier agreements.
- Accounting, invoices, tax records and applicable statutory filings.
- Employment or contractor documentation and business administration, where relevant.

6.2 Consulting and software development

DataSimplified generally performs consultancy work directly in customers' systems, applications, databases and networks. Customer operational information ordinarily remains in the customer-controlled environment; DataSimplified does not routinely move or maintain independent copies of such datasets.

Consultancy-related records that DataSimplified may hold include statements of work, contracts, proposals, invoices, project communications, support tickets and technical or project documentation. Authorised access to a customer system can still constitute processing of personal information, and the legal treatment of any record depends on the relevant arrangement and control over that record.

6.3 HRSimplified

- Customer contracts, subscriptions, service and support records, account administration and user records.
- HR management information, employee records and related modules hosted in the platform for customer organisations.
- Technical, audit and security records, subject to retention and customer agreements.

For customer-controlled HR records, the subscribing organisation generally determines processing purposes and instructions. DataSimplified processes such information under the relevant contractual arrangements and does not treat customer data as information freely available to third parties.

6.4 OffGrid Expeditions

- Traveller accounts and contact information; travel enquiries and quotation correspondence when enabled.
- Operator business profiles, memberships, verification material and approval records.
- Accommodation, activities, tours, safari packages and publication histories.
- Security, communication, privacy request and consent records.

OffGrid Expeditions facilitates introduction and quotation requests. Independent operators provide the actual travel services and manage reservations and payment directly outside the OGE quotation marketplace.

6.5 Technology and security

- Infrastructure, system administration, authentication, monitoring and security event records.
- Backup, recovery and incident records, technical agreements and service administration.

7. Processing of personal information

7.1 Processing purposes

Processing purposes include business and contract administration; account registration and authentication; service and technical support; HR software services performed under customer instructions; operator onboarding and verification; traveller enquiries and quote facilitation; system security; lawful communications; statutory compliance; and optional website analytics or marketing where lawful.

7.2 Data subject categories

Category	Information categories
Customers, suppliers and representatives	Names, business contacts, contracts, billing and correspondence
Employees and contractors	Contact, work, agreement and statutory personnel information, as applicable
HRSimplified users and customer employees	Account information; HR and employment-related information processed for subscribing organisations
OGE travellers	Account details, enquiries, travel preferences, related messages
OGE operators	Contact and business details, verification documents, listing and quotation records
Website visitors	Necessary technical/security data and optional analytics/consent data
Privacy and PAIA requesters	Contact details, identity verification outcome and request administration

7.3 Recipients of personal information

Where necessary and lawful, personal information may be provided to authorised staff and contractors, customer organisations responsible for their own data, contracted hosting and infrastructure operators, support and email providers (including SendGrid where used), Cloudflare security services, approved travel operators receiving relevant enquiries, professional advisers, and public authorities where required. Optional analytics providers may receive information only in accordance with the applicable consent and privacy arrangements.

7.4 Planned transborder flows

DataSimplified may serve customers and users across national borders and use infrastructure or communication providers with international operations. OffGrid Expeditions may transmit traveller enquiry information to selected operators in other countries. The Company assesses such transfers under POPIA and, where relevant, the EU or UK GDPR, and uses applicable transfer safeguards or other permitted grounds. Specific hosting and subprocessor locations are documented in the underlying operational records and product notices.

7.5 Information security

Safeguards appropriate to the information and system include access control, authentication, encrypted transmission, limited privileged access, protected verification documents, logging, backup and recovery arrangements, supplier commitments and incident-response procedures. Security measures are reviewed as systems and risks evolve.

8. How to request access

A requester seeking a record under PAIA should send the prescribed Form 2 (Request for Access to Record) to info@datasimplified.co.za, addressed to the Information Officer. The form is available from the Information Regulator. The request should identify the record sufficiently, provide contact details and a preferred form of access, and explain the right to be exercised or protected and why access to the record is needed to exercise or protect that right, as required under PAIA. A requester acting for another person should provide proof of authority.

Individuals requesting access to their own personal information may also use applicable POPIA procedures and product-specific privacy request channels, including the OffGrid Expeditions privacy request page where relevant.

9. Fees, decisions and timeframes

Any prescribed request or access fees will be assessed under PAIA and the current regulations. Where payment is due, the requester will be notified. A decision will ordinarily be made within 30 days, subject to lawful extension and applicable statutory provisions. The Company may grant, partially grant or refuse access, with reasons and available remedies communicated as required.

10. Grounds for refusing access

PAIA provides protections for third-party privacy, confidential commercial and financial information, privileged material, certain safety and security matters and other legally protected records. Each request is considered on its facts, including whether partial disclosure is appropriate. A listed record category does not itself guarantee access to any specific record.

11. Complaints and remedies

Requesters may seek remedies available under PAIA, including approaching the Information Regulator or a competent court subject to applicable processes and time limits. Information Regulator: https://inforegulator.org.za.

12. Availability and review

This manual is available free of charge from the Company website and for public inspection at the principal place of business during normal business hours. Copies may be requested from the Information Officer, subject to lawful reproduction charges where applicable. The manual will be made available to the Information Regulator on request and reviewed regularly to reflect material changes.

Approved and issued by: Michael Hamilton, Managing Director and Information Officer
Date: 5 November 2026
Version: 1.0

Related websites: https://www.datasimplified.co.za | https://hrsimplified.org | https://offgridexpeditions.com