

PAIA MANUAL

Prepared in terms of Section 51 of the Promotion of Access to Information Act, 2000

For Private Body: Life Pulse (Pty) Ltd

1. INTRODUCTION

This manual is published in terms of **Section 51 of the Promotion of Access to Information Act, 2000 (PAIA)** and addresses the requirements of the **Protection of Personal Information Act, 2013 (POPIA)**.

Its purpose is to:

- Provide a description of the records held by Life Pulse (Pty) Ltd
- Outline the procedure for requesting access to such records
- Inform requesters of the grounds upon which access may be refused

This manual applies to all information held by **Life Pulse (Pty) Ltd**, whether in physical or electronic form.

2. DETAILS OF THE PRIVATE BODY

Company name: Life Pulse (Pty) Ltd

Trading name: Life Pulse™

Registration number: 2014/195417/07

Physical address: Wilderness, Western Cape, South Africa

Website: www.lifepulse.co.za

Email: info@lifepulse.co.za

3. INFORMATION OFFICER

In terms of POPIA and PAIA, the Information Officer is:

Name: Johan Oelofsen

Position: Director / Information Officer

Email: info@lifepulse.co.za

The Information Officer is responsible for:

- Compliance with PAIA and POPIA
 - Processing access requests
 - Ensuring protection of personal information
-

4. GUIDE TO PAIA

A guide to PAIA is available from:

The Information Regulator (South Africa)

Website: <https://www.justice.gov.za/infoereg/>

Email: infoereg@justice.gov.za

This guide explains:

- How to submit an access request
 - Applicable fees
 - Available remedies
-

5. RECORDS HELD BY LIFE PULSE (PTY) LTD

5.1 Company Records

- Registration documents
 - Shareholder agreements
 - Director resolutions
 - Financial and tax records
 - Accounting records
-

5.2 Operational Records

- Supplier agreements
- Manufacturing and formulation records
- Quality control documentation

- Inventory and logistics records
-

5.3 Customer Records

- Order history
 - Delivery details
 - Communication records
 - Payment confirmations (excluding card details)
-

5.4 Practitioner Records

- Practitioner applications
 - Qualification verification documents
 - Role-based access records
 - Wholesale pricing agreements
-

5.5 Website and E-commerce Records

- User account information
 - Website usage data (cookies)
 - Product ordering data
-

5.6 Intellectual Property

The following are considered confidential and proprietary:

- Formulations
- Protocol structures
- Practitioner educational materials
- Wholesale pricing structures

- Product development documentation

Access to these records may be refused in terms of PAIA.

6. PROCESSING OF PERSONAL INFORMATION (POPIA)

Life Pulse processes personal information for:

- Order fulfilment
- Customer communication
- Practitioner verification
- Compliance with legal and tax obligations

We do not sell or distribute personal data.

Personal information is protected through:

- Secure digital storage
 - Restricted access controls
 - Role-based website permissions
-

7. REQUEST PROCEDURE

To request access to records, a requester must:

1. Submit a written request to the Information Officer
2. Provide sufficient detail to identify the requested record
3. Provide proof of identity
4. Pay the prescribed request fee (if applicable)

Requests must be sent to:

 info@lifepulse.co.za

8. FEES

Fees are charged in accordance with PAIA regulations.

The Information Officer will notify the requester of:

- The applicable request fee
 - Any reproduction or access fees
-

9. GROUNDS FOR REFUSAL OF ACCESS

Access to records may be refused in accordance with PAIA, including where disclosure would:

- Reveal trade secrets
 - Disclose intellectual property
 - Compromise confidential practitioner materials
 - Breach personal privacy of customers or practitioners
 - Prejudice commercial or financial interests of Life Pulse
-

10. AVAILABILITY OF THIS MANUAL

This manual is:

- Available on request
 - Published on the Life Pulse website
-

11. UPDATING OF THE MANUAL

This manual will be updated periodically to reflect:

- Changes in legislation
 - Changes in business operations
 - POPIA compliance requirements
-

12. CONTACT DETAILS FOR REQUESTS

All PAIA and POPIA requests must be directed to:

Information Officer

Life Pulse (Pty) Ltd

Wilderness, Western Cape, South Africa

Email: info@lifepulse.co.za