

LEARNING SANDBOX (PTY) LTD

PAIA MANUAL

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

Date of compilations: 22 September 2025





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1. PURPOSE OF PAIA MANUAL

This PAIA Manual is useful for you, the requestor of information, to understand what types of information the company has and how you may get access to our records. The Promotion to Access of Information Act 2 of 2000 as amended from time to time (known as PAIA) requires us to draft and make this PAIA manual available to you.

2. INTRODUCTION TO LEARNING SANDBOX (PTY) LTD

We are a global educational technology consultancy. By harnessing the power of human collaboration and technology, we create premium online educational experiences for diverse international partners.

3. OUR CONTACT DETAILS

Our details are as follows:

Company name: Learning Sandbox (Pty) Ltd

Registration number: 2020/029137/07

Postal address: 3 Hermitage Way, Meadowridge, Cape Town, Western Cape, 7806

Office address: Venture Workspace, Office 18, Constantia Emporium, C/o Ladies Mile
and Spaanschemat River Road, Constantia, Western Cape, 7806

Contact email address: accounts@learningsandbox.com

Website: <https://www.learningsandbox.com/>

Information officer: Scott Lowry

Information officer email address: scott@learningsandbox.com

4. FURTHER GUIDANCE FROM THE INFORMATION REGULATOR

For further guidance you can contact the Information Regulator. The Regulator's website contains a guide in each official language of South Africa on how to exercise any right under PAIA, under section 10 of the Act.

The Information Regulator can be contacted at the details below:

Telephone: 010 023 5200
General Email: enquiries@inforegulator.org.za
Website: <https://inforegulator.org.za/>

5. RECORDS WHICH ARE AUTOMATICALLY AVAILABLE

The following information is automatically available to you without needing to request access to it through the submission of Form 2.

Type of record	How you can access it
Memorandum of Incorporation Directors' names Registration documentation	Available from CIPC
Banking details	Request by email

6. RECORDS WE HOLD TO FUNCTION

We hold the following subjects and categories of records which we do not make automatically available. You may request access to them. These are records that most organisations have.

Subjects	Categories
Company Records	- Company registration and incorporation documents - Memorandum of Incorporation (MOI) - Shareholder registers and share certificates - Company policies and procedures - Board meeting minutes and resolutions - Statutory registers (e.g. directors, auditors)
Business Records	- Operational records - Internal correspondence - Product records
Financial and Tax Records	- Annual financial statements - General ledger and trial balances - Banking and cash flow records - Invoices and receipts - Fixed asset registers - Tax returns and assessments - VAT, PAYE, UIF records
Insurance Records	- Insurance policies - Premium payment records - Correspondence with insurers

Personnel and Employment Records	- Employment contracts, offer letters and CV's - Employee personal information - Payroll and remuneration records - Leave records - Disciplinary and grievance records - Performance evaluations - Training and development records
Agreements and Contracts	- Third-party contracts and agreements - Lease and rental agreements
Regulatory documents	- Company Records - Financial and Tax Records - Personnel and Employment Records
Customer and Supplier Records	- Customer and supplier contracts - Contact and communication details - Customer service correspondence - Invoices and payment records
Policies and directives	- Policies and manuals relating to employees - IT systems and documents

7. RECORDS WE HOLD TO COMPLY WITH THE LAW

We hold records that all organisations are required by law to hold. This includes the following main laws:

- Basic Conditions of Employment Act 75 of 1997;
- Companies Act 71 of 2008;
- Compensation for Occupational Injuries and Disease Act 130 of 1993;
- Income Tax Act 58 of 1962;
- Labour Relations Act 66 of 1995;
- Protection of Personal Information Act 4 of 2013;
- Skills Development Act 97 of 1998;
- Skills Development Levies Act 9 of 1999;
- Unemployment Insurance Act 63 of 2001;
- Unemployment Insurance Contributions Act 4 of 2002; and
- Value Added Tax Act 89 of 1991.

8. HOW WE PROCESS AND PROTECT PERSONAL INFORMATION

We process the personal information of various categories of people for various purposes.

8.1 A description of the categories of data subject and the information we may process relating thereto:

Categories of data subjects	Personal information that we may process
Customers / Clients	name, address, registration numbers or identity numbers, and bank details
Service Providers	names, registration number, vat numbers, address and bank details

Employees	identity number, address, contact numbers, qualifications, gender and race, emergency contact details. resumes, income tax registration number.
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8.2 Transborder flows of personal information

We may transfer personal information to third parties in other countries for purposes such as data storage, cloud services, HR administration, or customer relationship management. Countries involved in such transfers may include the United Kingdom, United States of America and the European Union. We will only transfer data to other countries who have similar or more stringent privacy laws to South Africa's, or recipients who represent and warrant that they protect the personal information to at least the same standard required in South Africa.

8.3 General description of Information Security Measures to be implemented by the responsible party to ensure the confidentiality, integrity and availability of the information.

We implement appropriate, reasonable technical and organisational security measures to protect personal information against loss, unauthorised access, disclosure, alteration, or destruction. These measures include the use of secure passwords, access control systems, encryption, antivirus software, firewalls, regular data backups, and disaster recovery planning. Physical access to systems is restricted, and staff receive regular training on information security and data protection obligations. In addition, the organisation conducts regular security assessments and maintains agreements with third-party service providers to ensure the security of outsourced data processing activities.

9. HOW TO REQUEST ACCESS

To request access to a record, please complete Form 2 available on the Information Regulators website.

Please submit the completed form to our information officer's email address scott@learningsandbox.com, kindly copy accounts@learningsandbox.com in your email.

We will then contact you regarding the request fee payable. Please refer to the request fee prescribed by law, below.

Please ensure that the completed form:

- has enough information for the information officer to identify you, the requested records, and which form of access you require;
- specifies your email address or postal address;
- describes the right that you seek to exercise or protect;
- explains why you need the requested record to exercise or protect that right;
- provides any other way you would like to be informed of our decision other than in writing; and
- provides proof of the capacity in which you are making the request if you are making it on behalf of someone else (we will decide whether this proof is satisfactory).

If you do not use the standard form we may:

- reject the request due to lack of procedural compliance;
- refuse it if you do not provide sufficient information; or
- delay it.

10. HOW WILL WE GIVE ACCESS

We will evaluate and consider all requests received. If we approve your request, then we will decide how to provide access to you – unless you have asked for access in a specific form. Publication of this manual does not give rise to any rights to access information records, except in terms of PAIA.

11. HOW MUCH WILL IT COST

The law prescribes a **request fee** which is payable when submitting a request for information. You will receive instruction for payment once the request to access form is submitted to us.

The law prescribes an **access fee** which is payable when the request to access information is granted. This is a fee for the time it takes to handle the request, or if the time has exceeded the prescribed hours to search and prepare the record for disclosure. We will inform you of the fee payable based on the prescribed fees.

The Fee Schedule is available from this [link](#).

We may withhold the record you requested until you have paid the fees.

12. GROUNDS TO REFUSE ACCESS

We may have to refuse you access to certain records in terms of PAIA to protect:

- someone else's privacy;
- another company's commercial information;
- someone else's confidential information;
- the safety of individuals and property;
- records privileged from production in legal proceedings; or
- research information.

We will notify you in writing whether your request has been approved or denied within 30 calendar days after we have received a completed request for access form. If we cannot find any requested record or it does not exist, then we will notify you by way of affidavit that it is not possible to give access to that particular record.

13. REMEDIES AVAILABLE IF WE REFUSE ACCESS

If your request for access is denied, you may:

- apply to a court with appropriate jurisdiction, or
- lodge a complaint with the Information Regulator, for the necessary relief.

14. AVAILABILITY OF THE MANUAL

This manual is available in English and will be available:

- on our website
- at our offices (please contact us before visiting our offices as we are working remotely)
- from the Information Regulator upon request.



15. UPDATING OF THE MANUAL

This manual will be updated whenever we make material changes to it.

Issued by

A handwritten signature in black ink, appearing to be "SL", written over a horizontal blue line.

Scott Lowry (Sep 22, 2025 11:51:48 GMT+2)

Scott Nicholas Lowry

Chief Executive Officer and Director

Learning Sandbox (Pty) Ltd

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Final Audit Report

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