

## Promotion Of Access To Information Act Manual

<b>VERSION CONTROL</b>	V1.1
<b>DATED</b>	30 March 2026

### Who we are

10XBeta is a healthtech-focused venture studio that partners with founders to build, manufacture, and launch innovative medical devices and connected care solutions. We combine in-house engineering, capital, and global expertise to accelerate concepts into market-ready healthcare products.

<b>BUSINESS NAME</b>	10XBeta (Pty) Ltd a private company with limited liability registered in South Africa with registration number 2017/284977/07
<b>PHYSICAL ADDRESS</b>	Springfield Office Park, 99 Jip de Jager Drive, Bellville, Western Cape, 7530
<b>DIRECTORS</b>	Marcel Botha, Jan Boonzaaier du Preez, Frederick Zacharias Kruger & Johannes Michiel Bredenkamp
<b>CONTACT DETAILS</b>	southafrica@10xbeta.com
<b>WEBSITE</b>	<a href="https://10xbeta.com">https://10xbeta.com</a>

### About this manual

We respect your right of access to information. This manual will help you to exercise the right to get access to some of our records when the record is required to exercise or protect your rights, you have followed the procedures, and we do not have any reason to refuse your request.

This manual has been made available in compliance with Section 51 of the Promotion to Access of Information

Act 2 of 2000 (generally referred to as "PAIA").

This manual is available on our website. It is also available at our principal place of business during normal working hours and can be requested via email from our Information Officer.

## Definitions

<b>ACCESS REQUEST</b>	A formal request made in terms of Section 18 of PAIA to obtain access to records held by the company.
<b>DATA SUBJECT</b>	The natural or juristic person to whom personal information relates.
<b>INFORMATION OFFICER</b>	The person designated by the company to ensure compliance with PAIA and POPIA, including handling access requests and overseeing data protection efforts.
<b>MANUAL</b>	This PAIA manual, compiled in terms of Section 51 of PAIA, read with applicable sections POPIA.
<b>PERSONAL INFORMATION</b>	Any information relating to an identifiable, living natural person or, where applicable, an identifiable, existing juristic person. This includes, but is not limited to, names, contact details, identity numbers, employment history, financial information, biometric data, and opinions.
<b>SPECIAL PERSONAL INFORMATION</b>	A subset of personal information that is more sensitive in nature and includes information related to a person's race, health, sex life, biometric and genetic data, religious or philosophical beliefs, political opinions, or trade union membership.
<b>POPIA</b>	The Protection of Personal Information Act, 4 of 2013, which regulates the processing of personal information and provides data subjects with rights to privacy and access.
<b>PAIA</b>	The Promotion of Access to Information Act, 2 of 2000, which provides for the right of access to information held by public and private bodies, subject to justifiable limitations.
<b>PROCESSING</b>	Any operation or activity, whether automated or not, concerning personal information, including collection, receipt, storage, use, distribution, updating, modification, and destruction.
<b>RECORD</b>	Any recorded information, regardless of form or medium, that is held by or under the control of the company, and whether it was created by the company or not. This includes written documents,

	electronic data, audio-visual materials, and photographs.
<b>REQUESTER</b>	Any person (natural or juristic) making a request for access to a record in terms of PAIA.
<b>RESPONSIBLE PARTY</b>	The public or private body (in this case, 10XBeta) that determines the purpose and means of processing personal information.
<b>THIRD PARTY</b>	Any natural or juristic person other than the data subject, responsible party, or operator who may receive personal information from the company.
<b>OPERATOR</b>	A person or entity who processes personal information on behalf of the responsible party in terms of a contract or mandate, without coming under the direct authority of that responsible party.
<b>TRANSBORDER FLOW</b>	The movement of personal information across South African borders to a foreign country, either electronically or physically.

## Who can you contact for assistance?

If you need to access our information or records, you can contact our Information Officer:

<b>NAME</b>	Maricia Engelbrecht
<b>ADDRESS</b>	Springfield Office Park, 99 Jip de Jager Drive, Bellville, Western Cape, 7530
<b>CONTACT NUMBER</b>	+27 822 191 636
<b>EMAIL ADDRESS</b>	maricia.engelbrecht@10xbeta.com

## Further guidance from the information regulator

If you require additional guidance regarding PAIA and exercising your rights, you can contact the Information Regulator or read the Information Regulator's PAIA guide in each official language at:

<https://info regulator.org.za/paia-guidelines/>.

The Information Regulator's details:

<b>WEBSITE</b>	<a href="http://www.info regulator.org.za">www.info regulator.org.za</a>
<b>POSTAL ADDRESS</b>	PO Box 3153, Braamfontein, Johannesburg, 2017
<b>PHYSICAL ADDRESS</b>	JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001
<b>CONTACT NUMBER</b>	010 023 5200
<b>LODGE A COMPLAINT</b>	<a href="mailto:paia complaints@info regulator.co.za">paia complaints@info regulator.co.za</a>
<b>GENERAL ENQUIRIES</b>	<a href="mailto:enquiries@info regulator.org.za">enquiries@info regulator.org.za</a>

## Information available in terms of POPIA

In terms of the Protection of Personal Information Act, 4 of 2013 ("POPIA"), 10XBeta is committed to protecting the privacy of data subjects and ensuring that personal information is processed lawfully and transparently.

Purpose of Processing:

10XBeta processes personal information for specific and lawful purposes related to its business operations. The exact purpose depends on the nature of the information and the data subject involved and is usually disclosed explicitly or implicitly at the time of collection. These purposes include, but are not limited to:

- Onboarding of clients, founders, and suppliers
- Evaluating funding proposals and partnerships
- Delivering incubation, advisory, and support services
- Employment and HR administration
- Compliance with legal and regulatory obligations
- Record-keeping and communication
- Event coordination and security
- Research and development, including pilot studies or medical trials

A full overview of how we handle personal information is available in our Privacy Policy, which can be accessed on our website or requested from our Information Officer.

## Categories of Personal Information Collected:

10XBeta may collect and process the following types of personal and special personal information, depending on the context:

- Full names, addresses, contact details (email, phone)
- Identity numbers, passport numbers, company registration numbers
- Demographic details (e.g. gender, marital status, nationality, date of birth)
- Employment history and job titles
- Financial information (bank details, income, payment records)
- Tax information and SARS-related data
- Biometric data (e.g. fingerprints, photographs, CCTV footage)
- Health information and dietary requirements (e.g. where relevant to events or trials)
- Information from third-party screening services
- Personal information submitted through our website, forms, applications, or during engagements

10XBeta processes personal information in respect of the following categories of data subjects:

- Employees and job applicants
- Founders, co-founders, and directors of supported start-ups
- Clients, vendors, suppliers, and investors
- Prospective clients or partners
- Event attendees and training participants
- Third-party service providers and contractors
- Any party with whom 10XBeta conducts business

Depending on the nature of the information and legal obligations, personal information may be disclosed to:

- Statutory oversight bodies, regulators, or judicial commissions
- Courts, arbitration forums, or ombudsmen
- SARS and other governmental authorities
- Third-party service providers or advisors (e.g. legal, HR, IT)
- Approved credit bureaus or industry associations
- Event or trial partners, under non-disclosure or service agreements
- Anyone entitled to access information under applicable law

All disclosures are made in compliance with POPIA and other applicable laws.

## Transborder Information Flows:

Personal information may be transferred across international borders, for example:

- When data subjects engage with 10XBeta from outside South Africa
- When 10XBeta uses international service providers (e.g. cloud platforms or research organisations)
- When projects or start-ups are supported in or engage with foreign jurisdictions
- When personal information is shared with foreign partners, suppliers, or collaborators in connection with a project or trial
- When personal information is shared internally within the broader group of companies to which 10XBeta belongs, including its foreign head office or affiliated entities, for group-level administrative, compliance, or strategic purposes.

10XBeta ensures that any cross-border transfers comply with the requirements of POPIA and are subject to contractual or statutory safeguards.

## Information Security Measures:

10XBeta implements appropriate technical and organisational measures to protect personal information from loss, misuse, unauthorised access, alteration, or destruction.

These include:

- Documented information security policies and access controls
- Firewalls, antivirus software, and intrusion detection systems
- Regular data backups and recovery procedures
- Encryption of sensitive information
- Staff training and security awareness programmes
- Monitoring, logging, and periodic vulnerability assessments
- Use of VPNs and physical access controls at offices

10XBeta retains personal information only for as long as necessary to fulfil the purposes for which it was collected, or as required by law, regulation, or contractual obligation. Retention periods are determined by the nature of the information, the legal or operational requirements associated with it, and any prescribed retention periods under applicable legislation. Where information is no longer required, it is securely destroyed, deleted, or de-identified in accordance with 10XBeta's internal data retention and destruction policies, and in a manner that ensures it cannot be reconstructed or accessed

## Available Records

These are records that we make available automatically without you needing to request access to them in terms of PAIA.

RECORDS:	ACCESS:
DIRECTORS' NAMES	<a href="http://www.bizportal.gov.za">www.bizportal.gov.za</a>
OTHER INCORPORATION DOCUMENTS	<a href="http://www.bizportal.gov.za">www.bizportal.gov.za</a>
BANKING DETAILS	Request via e-mail
INFORMATION ABOUT OUR BUSINESS AND SERVICES	Available on our website
PRIVACY POLICY	Available on our website

## Records we require to do your business

We hold certain categories of records in electronic or physical format. We do not make these records available automatically. You may request access to these documents in terms of PAIA:

CATERGORIES:	RECORDS:
COMPANY RECORDS	Certificate of Incorporation Memorandum of Incorporation (MOI) Share register Company policies and internal procedures Minutes of board meetings and resolutions Statutory registers and filings

<b>FINANCIAL AND TAX RECORDS</b>	<p>Annual financial statements</p> <p>Accounting records and tax returns</p> <p>Invoices and payment records</p>
<b>INVESTMENT AND PARTNER RECORDS</b>	<p>Investment proposals and due diligence reports</p> <p>Term sheets, funding agreements, and investor contracts</p> <p>NDA's and MoUs with start-ups and capital partners</p> <p>Founders' pitch decks and business plans</p> <p>Pipeline evaluation records</p> <p>Monitoring and evaluation reports for investments</p>
<b>INVESTMENT AND START-UP RELATED RECORDS</b>	<p>Investment proposals and agreements</p> <p>Founders' onboarding documents</p> <p>Product development and prototyping records</p> <p>Confidentiality agreements and pitch decks</p>
<b>CLIENT AND SERVICE PROVIDER RECORDS</b>	<p>Service provider agreements</p> <p>Correspondence and due diligence records</p>
<b>LEGAL AND COMPLIANCE RECORDS</b>	<p>Contracts and service agreements</p> <p>Insurance documents</p> <p>POPIA and PAIA compliance records</p> <p>Litigation or legal correspondence (if applicable)</p>
<b>HUMAN RESOURCES RECORDS</b>	<p>Employee contracts and payroll records</p> <p>Leave, disciplinary, and grievance records</p> <p>Employment equity and statutory compliance records</p>
<b>MEDICAL AND CLINICAL RESEARCH RECORDS</b>	<p>Trial protocols and ethics approvals</p> <p>Consent documentation</p>

	<i>Note: These records may be subject to ethical and legal confidentiality restrictions.</i>
<b>INFORMATION TECHNOLOGY AND SECURITY</b>	IT and cybersecurity policies Backup, access control, and recovery procedures

## Records that we are required to hold by law

We keep certain legislative records that we are required to keep by law. You can request that we provide you with these records. We keep the following legislative records:

<b>CATEGORIES:</b>	<b>RECORDS:</b>
<b>COMMUNICATIONS AND IT</b>	Electronic Communications Act 36 of 2005  Electronic Communications and Transactions Act 25 of 2002  Cybercrimes Act 19 of 2020
<b>COMPLIANCE AND CORPORATE GOVERNANCE</b>	Companies Act 71 of 2008
<b>EMPLOYMENT AND LABOUR LEGISLATION</b>	Basic Conditions of Employment Act 75 of 1997  Labour Relations Act 66 of 1995  Employment Equity Act 55 of 1998  Compensation for Occupational Injuries and Diseases Act 130 of 1993  Unemployment Insurance Act 63 of 2001  Occupational Health and Safety Act 85 of 1993  Protected Disclosures Act 26 of 2000  Skills Development Act 97 of 1998

	<p>Skills Development Levies Act 9 of 1999</p> <p>Unemployment Insurance Contributions Act 4 of 2002</p>
<b>TAX AND FINANCE</b>	<p>Income Tax Act 58 of 1962</p> <p>Insolvency Act 24 of 1936</p> <p>Tax Administration Act 28 of 2011</p> <p>Value Added Tax Act 89 of 1991</p>
<b>GENERAL</b>	<p>Consumer Protection Act 68 of 2008</p> <p>Prescription Act 18 of 1943</p> <p>Promotion of Equality and Prevention of Unfair Discrimination Act 4 of 2000</p> <p>Promotion of Access to Information Act, No 2 of 2000</p> <p>Protection of Personal Information Act 4 of 2013</p>

## Who may request access to the records?

You may request records from us if those records are required to exercise or protect your rights.

PAIA provides that a person may only make a request for information, if the information is required for the exercise or protection of a legitimate right.

## How do you request access to records?

Our Information Officer has been appointed to deal with all PAIA-related matters. To request access to a record, please complete [Form 2](#) (available at <https://inforegulator.org.za/wp-content/uploads/2020/07/InfoRegSA-PAIA-Form02-Reg7.pdf>) and submit the form and the request fee to our Information Officer via email, or by submitting it at our physical address.

The completed form must include the following:

- enough information for our Information Officer to identify you, the records you request, and the form of access you require

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- your email address, postal address, or fax number must be included;
- you must describe the right you want to exercise or protect and why you need the requested record to exercise your right;
- provide any other way you would like to be informed of our decision to provide the record or not other than in writing; and
- it must provide proof of the capacity in which you are making the request if you are doing it on behalf of someone else.

If you do not use the standard form or if you do not provide enough information, we may reject or delay the request.

## How do we give you access?

We evaluate and consider all requests we receive. If we approve it, we will decide the form of access we will provide unless you have requested the record in a specific form.

## How much will the records cost?

PAIA allows us to charge a request and access fee. You must pay the prescribed fees before we give you access to the records. On your request, our Information Officer will notify you of the application procedure.

DESCRIPTION:	AMOUNT:
<b>Request fee, payable by every requester</b>	R140.00
<b>Photocopy or printed black &amp; white copy for every A4 page (Access fee)</b>	R2.00 per page or part of the page
<b>For a copy in a computer-readable form on a flash drive (provided by the requester)</b>	R40.00
<b>For a copy of visual images</b>	This service will be outsourced. The fee will depend on the quotation from the service provider.
<b>For a transcription of an audio record, per A4-size page</b>	R24.00

<b>For each hour or part of an hour (excluding the first hour) reasonably required to search for, and prepare the record for disclosure</b>	R145.00
<b>The search and preparation fee cannot exceed</b>	R435.00
<b>Deposit: if the search exceeds 6 hours</b>	One-third of the amount per request.
<b>Postage, email or any other electronic transfer</b>	Actual expense, if any.

## When can we refuse you access to a record?

We may refuse to provide you access to certain records to protect:

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

We will let you know if your request has been approved or denied with our reason within 30 calendar days after receiving your request. If we cannot find the record or if it does not exist, we will notify you that it is not possible to give access to that record by affidavit.

## What can you do if we refuse to give you access to a record?

If the Information Officer decides to grant access to a requested record, access must be provided within 30 (thirty) calendar days of notifying the requester of the decision, unless the record is held by a third party. Where records are held by a third-party, access must be provided within 60 (sixty) calendar days from the date of the original request.

If we refuse to give you access you may apply to a court with jurisdiction or lodge a complaint with the Information Regulator at [PAIAComplaints@inforegulator.org.za](mailto:PAIAComplaints@inforegulator.org.za).

## How do we process and protect personal information?

We process various forms of personal information for various business purposes. Please refer to our Privacy Policy, a copy of which can be requested from our information officer and is available on our website.

## Adoption

This PAIA Manual was adopted on 30 March 2026



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**Maricia Engelbrecht**  
Information Officer