

PRETIUM VERUM PAIA MANUAL

Prepared in terms of section 51 of the Promotion of Access to Information Act 2 of 2000

ISSUED AND EFFECTIVE — 2 SEPTEMBER 2026

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Document	Pretium Verum PAIA Manual
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Availability	See Section 9; availability implementation and evidence are maintained separately

Important status notice

This is the issued Pretium Verum PAIA Manual. It was approved by the owner and issued with effect from 2 September 2026. Issue does not by itself establish lawful public availability, general POPIA compliance or production readiness; those matters require separate implementation and evidence.

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1. Definitions and abbreviations

Term	Meaning
PAIA	Promotion of Access to Information Act 2 of 2000.
POPIA	Protection of Personal Information Act 4 of 2013.
Regulator	Information Regulator (South Africa).
Private body	Pretium Verum, operated by its sole proprietor.
Head / Information Officer	The person identified in Section 3.
Personal information	Personal information as defined in POPIA.

2. Purpose and description of the private body

This Manual describes the records held by Pretium Verum and explains how a person may request access to records under PAIA. It also records the categories of personal information relevant to section 51 and the applicable POPIA framework.

Pretium Verum is a South African sole-proprietor project intended to operate a shopping-comparison and affiliate-referral service. The service remains undeployed. It does not presently operate public customer accounts, accept customer payments, provide retailer checkout, ingest live retailer feeds, or record live affiliate sales, commissions or payouts. Any future production activity described in this Manual is conditional and must be updated before that activity begins.

3. Contact details of the head of the private body

Particular	Public information
Name of private body	Pretium Verum
Legal form	Sole proprietorship
Head / Information Officer	Marcel Wessel Brummer
Capacity	Head of Private Body / Information Officer; sole proprietor trading as Pretium Verum
Information Officer registration	Registered with the Information Regulator; registration number 2026-065488; registration date 28 August 2026
Email	support@pretiumverum.com
Telephone	074 871 7614
Address	Elephants View, Line Rd, Rustenburg Rural, Rustenburg, South Africa

No Deputy Information Officer is currently designated. Pretium Verum is a one-person sole proprietorship with no employees from whom a Deputy Information Officer could presently be designated. This position will be reassessed if the size or structure of the operation changes.

4. Guide on how to use PAIA

The Information Regulator publishes a PAIA Guide explaining how to exercise rights under PAIA. The Guide and related forms are available from the Information Regulator's official website. The Guide may also be requested from the Regulator.

The Information Regulator's specific guidance for private bodies states that a private body is not required to compile its Manual in more than one language or in a specified language, while recommending English. Pretium Verum therefore proposes English for its initial Manual. A translation may be added later if required or useful for access; translations are not prohibited.

Information Regulator PAIA resources: <https://inforegulator.org.za/paia/>

Information Regulator PAIA guidelines: <https://inforegulator.org.za/paia-guidelines/>

5. Records available without a PAIA request

No category of Pretium Verum records is currently designated as automatically available under section 52 of PAIA. This issued Manual, once made available through the lawful channels described in Section 9, and any other record expressly made public on the official Pretium Verum website may be accessed without a PAIA request. This section will be updated if additional records are made automatically available.

6. Records held in accordance with legislation

The following laws are relevant to records currently held or to records that may arise if the proposed service becomes operational. A reference does not imply that every provision applies in every circumstance.

Legislation	Current or conditional relevance
Promotion of Access to Information Act 2 of 2000	Current: this Manual, access requests, decisions, correspondence and related records.
Protection of Personal Information Act 4 of 2013	Current for limited owner/compliance information; future for personal information processed through approved public features.
Electronic Communications and Transactions Act 25 of 2002	Conditional: electronic-record and future online-service duties according to the actual service offered.
Consumer Protection Act 68 of 2008	Conditional: consumer-facing marketing, disclosure and fair-practice duties according to the future public referral model.
Income Tax Act 58 of 1962 and Tax Administration Act 28 of 2011	Conditional: genuine income, expense, return and supporting records only where the owner's actual tax circumstances make them applicable. No deductibility or special tax treatment is claimed.

7. Categories of records held by Pretium Verum

The descriptions below are category-level descriptions. Access remains subject to PAIA, POPIA and any lawful ground for refusal. Detailed source code, credentials, private contracts, personal information and security-sensitive material are not automatically available.

Record category	Current position
Governance and compliance	Requirements, decisions, policies, work records, readiness records, PAIA/POPIA preparation records and Information Officer registration evidence.
Business identity and contact	Owner-authorised business identity and contact particulars, domain-registration and business-email records.
Technical and design	Source code, non-secret configuration templates, architecture, test and design records, and synthetic development fixtures.

Record category	Current position
Affiliate and provider preparation	Candidate research, application preparation and retained programme/application correspondence. No record is proof of an approved live relationship unless genuine approval evidence exists.
Limited financial fact	The owner reports approximately R200 of pre-launch expenditure to register pretiumverum.com through an ordinary bank account. No separate invoice, receipt, exact-amount evidence or dedicated Pretium Verum accounting record is held.
Revenue and commercial activity	No Pretium Verum revenue, affiliate commission, payout, sale, customer invoice, retailer transaction, VAT record, payroll record or production accounting ledger currently exists.
Customers, personnel and production operations	No public customer-account, order, checkout, live feed, live price/stock, public analytics/tracking, production alert, production log, employee or contractor record currently exists.

8. Processing of personal information

8.1 Current processing

The current private project retains limited owner/business contact and compliance information, version-control metadata and limited programme correspondence for governance, compliance preparation, auditability and protection of rights. No public personal-information processing is enabled. Ordinary shopping and search are intended to remain anonymous.

Pretium Verum does not currently request ordinary shoppers' home addresses, telephone numbers, dates of birth, government identifiers, payment-card data, children's information or special personal information.

8.2 Future purposes and categories

The following categories are conditional. They may be introduced only after the feature, purpose, lawful-processing assessment, notice, provider and security controls applicable to that feature have been approved.

Conditional purpose	Minimum information contemplated
Enquiries and support	Minimum contact details and message content needed to answer a user-initiated enquiry.
Accounts and authentication	Minimum profile, authentication and security state if optional public accounts are introduced.
Saved features and requested alerts	Saved products, searches, alert criteria, preferences and delivery destination selected by the user.
Consent, objections and suppression	Minimum evidence needed to honour choices, withdrawals, objections and do-not-contact controls.
Security and diagnostics	Bounded IP, device, browser and event data only where necessary for security, reliability and abuse prevention.
Affiliate attribution and analytics	Approved, disclosed, purpose-limited and preferably pseudonymous or aggregate event data.
Provider and business contacts	Business contact and correspondence data needed to manage a genuine approved relationship.
Accounting and compliance	Genuine statements, invoices, receipts, reconciliations and tax-support records only when actual activity creates them.

8.3 Categories of data subjects

Category	Current position
Owner / Information Officer	Current, limited business and compliance particulars.
People corresponding with Pretium Verum	Limited retained correspondence where a genuine enquiry or programme interaction exists.
Website visitors, account holders and alert recipients	Future only; no public production dataset currently exists.
Retailer, network and provider contacts	Future or limited correspondence only; no relationship is treated as approved without evidence.
Employees and contractors	Not currently applicable; none are engaged.

8.4 Recipients, operators and transborder transfers

No final production provider, operator, recipient or international-transfer inventory is approved. Domain registration does not establish the final hosting or processing architecture. Before any relevant feature activates, Pretium Verum will identify the actual recipient or operator, purpose, information category, location, contractual safeguards and any applicable POPIA section 72 basis. This Manual will be updated when those facts exist.

The recipient, operator and transfer particulars required for future processing are addressed in Section 8.4 and must be updated from genuine production facts before the related processing starts.

8.5 General description of information-security safeguards

Current development controls include data minimisation, access boundaries, separation of secrets, evidence and change traceability, fail-closed release controls, automated testing and incident-response planning. Before public processing begins, safeguards appropriate to the actual risks and providers must be implemented and verified. Detailed security configurations, threat models and vulnerability information are kept confidential where disclosure could create a security risk.

8.6 Notification when personal information is collected

Before an applicable future collection begins, the collection point must provide the information required by POPIA section 18, including the responsible party, information and source, purpose, voluntary or mandatory nature, consequences of non-supply, applicable law, recipients, transfers and protections, information category, access and correction rights, objection rights, and the right to complain to the Information Regulator. No final notice is represented as complete for a production feature that has not yet been approved.

8.7 Retention, deletion and de-identification

Personal information will not be retained longer than authorised by law or reasonably necessary for the documented purpose. When the purpose and every lawful ground for retention end, information must be securely deleted, destroyed so it cannot be reconstructed, or de-identified, subject to any lawful hold.

Where a record is required to be retained under applicable tax or business record-keeping law, it will be retained for the applicable statutory period. The reported pre-launch domain expenditure has not been determined to be deductible, and no special Pretium Verum tax treatment is claimed. The possible ordinary bank transaction does not, by itself, establish a specific owner-level tax-retention conclusion in this Manual.

Contractual provider retention periods and exact future operational periods will be recorded only after genuine agreements and production purposes exist. The shortest defensible purpose- and risk-based period will be selected, with deletion or de-identification when continued retention is no longer justified.

9. Availability of this Manual and access-request procedure

9.1 Availability arrangements

This issued Manual is to be made freely available on the Pretium Verum website and at the principal place of business for public inspection during normal business hours. A copy will be supplied on request, subject to any fee lawfully prescribed and applicable, and to the Information Regulator on request. Implementation and evidence of these availability channels are maintained separately from the issue of this Manual.

Because Pretium Verum is a one-person sole proprietorship without a public reception or inspection staff, advance contact may be used to arrange genuine inspection availability during normal business hours at the address in Section 3, provided this does not unlawfully or unreasonably impede access.

9.2 How to request access

Use the current prescribed Form 2, Request for Access to Record, available from the Information Regulator.

Send the completed request to the Head / Information Officer using the contact details in Section 3 and provide sufficient particulars to identify the record and the requested form of access.

Pay only a fee prescribed by the current PAIA framework if a lawful fee is applicable and notified.

Pretium Verum will communicate its decision and any applicable access fee using the prescribed process, including Form 3 where applicable.

PAIA's internal-appeal procedure is not presented as an appeal route for this private body. A requester may use the remedies applicable to a private-body request, including a complaint to the Information Regulator using the prescribed Form 5 or an application to a court, subject to PAIA's requirements.

Current official PAIA forms and guidance: <https://inforegulator.org.za/paia/>

10. Maintenance, approval and issue

This Manual must be reviewed and updated when material record categories, processing, recipients, operators, transborder transfers, safeguards, legislation, contact details or availability arrangements change.

The owner approved the frozen Owner-Approval Candidate v8 on 2 September 2026. This Manual was issued and became effective on 2 September 2026. Its content must be reviewed when material facts change. Lawful availability is implemented and evidenced separately from owner approval and issue.

Approval control	Status / entry
Owner approval	APPROVED — 2 September 2026
Approved by	Marcel Wessel Brummer, sole proprietor trading as Pretium Verum
Issue/effective date	2 September 2026
Issued artifact	Issued v1
Lawful availability	Implemented and evidenced separately from issue

Official sources used for this Manual

PAIA: <https://www.gov.za/documents/promotion-access-information-act>

PAIA Regulations: <https://www.gov.za/documents/notices/promotion-access-information-act-regulations-16-nov-2021>

Information Regulator PAIA Guide and private-body resources: <https://inforegulator.org.za/paia-guidelines/>

POPIA: <https://www.gov.za/documents/protection-personal-information-act>

SARS record-keeping guidance: <https://www.sars.gov.za/client-segments/record-keeping/>