

PAIA MANUAL

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

NAME OF PRIVATE BODY: NEURAL FORGE SOLUTIONS (Pty) Ltd

DATE OF COMPILATION: 01/09/2026

DATE OF REVISION: 01/09/2026

1. LIST OF ACRONYMS AND ABBREVIATIONS

- **"CEO"**: Chief Executive Officer
- **"DIO"**: Deputy Information Officer
- **"IO"**: Information Officer
- **"Minister"**: Minister of Justice and Correctional Services
- **"PAIA"**: Promotion of Access to Information Act No. 2 of 2000 (as amended)
- **"POPIA"**: Protection of Personal Information Act No. 4 of 2013
- **"Regulator"**: Information Regulator
- **"Republic"**: Republic of South Africa

2. PURPOSE OF PAIA MANUAL

This PAIA Manual is useful for the public to:

- Check the categories of records held by NEURAL FORGE SOLUTIONS (Pty) Ltd which are available without a person having to submit a formal PAIA request;
- Have a sufficient understanding of how to make a request for access to a record of the body, by providing a description of the subjects on which the body holds records and the categories of records held on each subject;
- Know the description of the records of the body which are available in accordance with any other legislation;
- Access all the relevant contact details of the Information Officer and Deputy Information Officer who will assist the public with the records they intend to access;
- Know the description of the guide on how to use PAIA, as updated by the Regulator and how to obtain access to it;
- Know if the body will process personal information, the purpose of processing of personal information and the description of the categories of data subjects and of the information or categories of information relating thereto;
- Know the recipients or categories of recipients to whom the personal information may be supplied;
- Know if the body has planned to transfer or process personal information outside the Republic of South Africa and the recipients or categories of recipients to whom the personal information may be supplied; and

- Know whether the body has appropriate security measures to ensure the confidentiality, integrity and availability of the personal information which is to be processed.

3. KEY CONTACT DETAILS FOR ACCESS TO INFORMATION OF NEURAL FORGE SOLUTIONS (Pty) Ltd

3.1. Chief Information Officer

- **Name:** Troy Donovan Du Toit
- **Title:** Managing Director
- **Email:** forge@neuralforge.co.za

3.2. Deputy Information Officer

- **Name:** Kashief Sauls
- **Title:** Managing Director
- **Email:** forge@neuralforge.co.za

3.3. Access to Information General Contacts

- **Email:** forge@neuralforge.co.za

3.4. National or Head Office

- **Physical Address:** Cape Town, Western Cape, South Africa
- **Postal Address:** Cape Town, Western Cape, South Africa
- **Email:** forge@neuralforge.co.za
- **Website:** <https://www.neuralforge.co.za>

4. GUIDE ON HOW TO USE PAIA AND HOW TO OBTAIN ACCESS TO THE GUIDE

4.1. The Regulator has, in terms of section 10(1) of PAIA, as amended, updated and made available the revised Guide on how to use PAIA ("Guide"), in an easily comprehensible form and manner, as may reasonably be required by a person who wishes to exercise any right contemplated in PAIA and POPIA.

4.2. The Guide is available in each of the official languages and in braille.

4.3. The aforesaid Guide contains the description of:

- The objects of PAIA and POPIA;
- The contact details of every Information Officer and Deputy Information Officer;
- The manner and form of a request for access to a record of a public or private body;
- The assistance available from the IO of a public body and from the Regulator;
- All remedies in law available regarding an act or failure to act in respect of a right or duty conferred or imposed by PAIA and POPIA;
- The provisions requiring a body to compile a manual and how to obtain access to it;
- Voluntary disclosure provisions;
- Fees to be paid in relation to requests for access; and
- Regulations made under PAIA.

4.4. Members of the public can inspect or make copies of the Guide from the offices of the public and private bodies, including the office of the Regulator, during normal working hours.

4.5. The Guide can also be obtained upon request to the Information Officer or from the website of the Regulator (<https://info regulator.org.za>).

4.6. A copy of the Guide is available in the following two official languages for public inspection during normal office hours:

- English
- Afrikaans

5. CATEGORIES OF RECORDS OF NEURAL FORGE SOLUTIONS (Pty) Ltd WHICH ARE AVAILABLE WITHOUT A PERSON HAVING TO REQUEST ACCESS

Category of Records	Types of the Record	Available on Website	Available upon Request
Public Company Information	Service offerings overview (Cortex, Tesseract, Engineering), About Us, Tech Stack details	X	X
Legal & Privacy Notices	Privacy Policy, Terms of Service, PAIA Manual	X	X
Marketing Materials	Technical case studies, public software documentation, insight articles	X	X

6. DESCRIPTION OF THE RECORDS OF NEURAL FORGE SOLUTIONS (Pty) Ltd WHICH ARE AVAILABLE IN ACCORDANCE WITH ANY OTHER LEGISLATION

Category of Records	Applicable Legislation
Company Registration Records	Companies Act 71 of 2008
PAIA & Compliance Documents	Promotion of Access to Information Act 2 of 2000
Data Protection Records	Protection of Personal Information Act 4 of 2013
Financial & Tax Records	Income Tax Act 58 of 1962 / Tax Administration Act 28 of 2011
Value-Added Tax Records	Value-Added Tax Act 89 of 1991
Employment & HR Records	Basic Conditions of Employment Act 75 of 1997 / Labour Relations Act 66 of 1995
Electronic Communications	Electronic Communications and Transactions Act 25 of 2002

7. DESCRIPTION OF THE SUBJECTS ON WHICH THE BODY HOLDS RECORDS AND CATEGORIES OF RECORDS HELD ON EACH SUBJECT

Subjects on which the body holds records	Categories of records
Corporate & Governance	Memorandum of Incorporation (MOI), Shareholder Agreements, Share Register, Director Resolutions, Board Minutes.
Financial & Accounting	Annual Financial Statements, Tax Returns, Invoices, Proof of Payments, Accounting Ledgers, Bank Statements.
Human Resources	Employment Contracts, Performance Reviews, Remuneration Records, UI 19 Filings, Internal Company Policies.
Client Operations & Software	Client Statements of Work (SOWs), Non-Disclosure Agreements (NDAs), Service Agreements, Technical Specifications, Project Delivery Logs.
Platform & Technical Architecture	Source Code Repositories, System Telemetry & Drift Monitoring Logs (Tesseract), Embeddings Architecture & Knowledge Base Structures (Cortex).
Sales & Marketing	Proposals, Commercial Quotes, CRM Records, Communication Logs across Web and Messaging Channels.

8. PROCESSING OF PERSONAL INFORMATION

8.1 Purpose of Processing Personal Information

NEURAL FORGE SOLUTIONS (Pty) Ltd processes personal information to:

- Execute software engineering contracts and deliver digital consultancy services;
- Operating proprietary software platforms, including Cortex (AI memory layer) and Tesseract (AI code guardrails);
- Communicate with prospective leads and answer client queries via website forms, email, or messaging channels;
- Manage administrative, HR, payroll, and regulatory compliance duties under South African law.

8.2 Description of the Categories of Data Subjects and Relating Information

Categories of Data Subjects	Personal Information that may be processed
Customers / Clients	Name, contact details, company registration details, VAT numbers, designated technical lead contacts, billing details.
Prospective Clients / Leads	Name, business email address, phone number, job title, project inquiry details submitted via web forms or messaging channels.
Employees & Contractors	Name, ID number, physical address, qualification records, tax number, bank details, performance evaluations.
Service Providers / Vendors	Vendor name, contact numbers, address, tax details, bank account information.

8.3 The Recipients or Categories of Recipients to Whom Personal Information May Be Supplied

Category of personal information	Recipients or Categories of Recipients to whom the personal information may be supplied
Identity & Tax Details	South African Revenue Service (SARS)
Banking & Payment Details	Financial Institutions / Commercial Banks
Employee Qualifications	Qualification verification agencies / SAQA
System & Hosting Telemetry	Secure Cloud Infrastructure Providers (AWS, Google Cloud Platform, Azure)

8.4 Planned Transborder Flows of Personal Information

To deliver high-performance software and AI integration, NEURAL FORGE SOLUTIONS (Pty) Ltd may process or back up data using cloud infrastructure hostings (e.g., Google Cloud, AWS) and AI processing endpoints (e.g., OpenAI, Anthropic) located outside the Republic of South Africa. All transborder flows strictly adhere to Section 72 of POPIA through standard processing agreements and robust technical encryption.

8.5 General Description of Information Security Measures

NEURAL FORGE SOLUTIONS (Pty) Ltd enforces technical and organizational security controls to protect personal data, including:

- **Encryption:** Standard encryption in transit (TLS 1.2+) and at rest (AES-256);
- **Access Control:** Strict Role-Based Access Control (RBAC), zero-trust architecture, and mandatory Multi-Factor Authentication (MFA) for administrative tools;
- **Platform Isolation:** Tenant data partitioning within Cortex and automated code review telemetry protections within Tesseract;
- **Vulnerability Management:** Automated CI/CD security scanning, regular dependency updates, and continuous monitoring.

9. AVAILABILITY OF THE MANUAL

9.1 A copy of the Manual is available:

- On the official website at <https://www.neuralforge.co.za>;
- At the office of NEURAL FORGE SOLUTIONS (Pty) Ltd for public inspection during normal business hours;
- To any person upon request and upon payment of a reasonable prescribed fee; and
- To the Information Regulator upon request.

9.2 A fee for a copy of the Manual, as contemplated in annexure B of the Regulations, shall be payable per each A4-size photocopy made.

10. UPDATING OF THE MANUAL

The head of NEURAL FORGE SOLUTIONS (Pty) Ltd will on a regular basis update this manual.

Issued by:

Troy Donovan Du Toit

Managing Director / Information Officer

NEURAL FORGE SOLUTIONS (Pty) Ltd