

PAIA MANUAL

LearnerLens

Private Body Manual prepared in terms of section 51 of the Promotion of Access to Information Act 2 of 2000, as amended

Organisation	LearnerLens
Organisation type	Private organisation Sole proprietorship
Information Officer	Lizaan Fourie
Information Regulator registration number	2026-008937
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This manual explains the records held by LearnerLens, how to request access to records, and how LearnerLens processes personal information in connection with its services.

Publication note

This manual is intended for publication on the LearnerLens website and for upload to the Information Regulator eServices portal.

1. Purpose of this Manual

This manual is published by LearnerLens as a private body. It is intended to assist any person who wishes to request access to records held by LearnerLens and to explain, at a practical level, the categories of records held, how such records may be accessed, and how personal information is processed.

LearnerLens is an online educational support service that provides non-diagnostic learner profiles, parent guidance materials, and related digital deliverables. This manual should be read together with LearnerLens's Privacy Policy, Terms and Conditions, Disclaimer, and any applicable request forms.

2. Key contact details for access to information

Private body	LearnerLens
Information Officer	Lizaan Fourie
Information Regulator registration number	2026-008937
Email for PAIA / POPIA requests	learnerlensprofile@gmail.com
Website	www.learnerlens.co
Street address	11 Koedoe Cres, Bethlehem

LearnerLens does not currently publish a separate public telephone or fax number for PAIA requests. Requests and communications should be sent by email.

3. Guide on how to use PAIA

The Information Regulator has made a Guide available to help persons understand how to use PAIA and POPIA, how to request access to records, and how to exercise the rights created by those laws.

- The Guide is available from the Information Regulator website.
- A copy may also be requested from LearnerLens by emailing the Information Officer.
- Members of the public may use the prescribed Form 02 to request access to a record and Form 05 to lodge a complaint with the Information Regulator if necessary.

Information Regulator website	www.inforegulator.org.za
General enquiries	enquiries@inforegulator.org.za
PAIA complaints	PAIAComplaints@inforegulator.org.za
Telephone	010 023 5200 Toll-free 0800 017 160
Current public address	Woodmead North Office Park, 54 Maxwell Drive, Woodmead, Johannesburg, 2191

4. Categories of records available without a formal PAIA request

The following records are ordinarily available to the public without the need to submit a formal PAIA request, subject to normal website access and any applicable technical availability.

Category of record	Examples	How it may be accessed
Website pages	Home, FAQ, Contact, How It Works, Pricing, age-band and service information	On the LearnerLens website
Legal and policy documents	Privacy Policy, Terms and Conditions, Disclaimer, PAIA Manual	On the LearnerLens website footer or by email request
Public marketing content	Public social media posts, promotional graphics, brochures, general service descriptions	Online where published or by reasonable email request

5. Records available in accordance with other legislation

Where applicable, LearnerLens may create, maintain, or make records available in accordance with South African legislation including the legislation listed below.

Category of records	Applicable legislation
PAIA Manual; access request records; complaint correspondence	Promotion of Access to Information Act 2 of 2000
Privacy notices; consent records; POPIA request or complaint records	Protection of Personal Information Act 4 of 2013
Electronic agreements, website transactions, online communications	Electronic Communications and Transactions Act 25 of 2002
Consumer-facing terms, refunds, and service disclosures	Consumer Protection Act 68 of 2008
Accounting, tax, and supporting financial records	Income Tax Act 58 of 1962; Tax Administration Act 28 of 2011; VAT Act 89 of 1991 where applicable

6. Description of subjects on which LearnerLens holds records and categories of records held

Subject	Categories of records held
Business administration and compliance	PAIA Manual, Information Officer registration certificate, internal compliance notes, complaints correspondence, policies, disclaimer, privacy and terms documents
Client and order records	Purchase confirmations, invoices, order references, selected products or packages, support correspondence, revision requests, delivery logs
Intake and report records	Completed questionnaires, parent observations, learner responses, consent confirmations, generated learner profiles, roadmaps, summaries, email delivery records
Finance and tax	Accounting records, bank or payment settlement records, tax records, refunds or chargeback records where applicable
Website and digital operations	Website content, forms, analytics configurations, cookie notices, service-provider settings, security or incident logs, access control records
Marketing and communications	Newsletter preferences, enquiry forms, social content, campaign assets, public marketing pages, customer support communications
Service providers and contractors	Supplier agreements, invoices, confidentiality commitments, service descriptions, platform records reasonably required to operate the business

7. Processing of personal information in terms of POPIA

7.1 Purpose of processing personal information

- To communicate with parents, guardians, adult learners, and prospective customers.
- To receive and review questionnaire responses and related educational observations.
- To prepare, quality-check, deliver, and support LearnerLens reports, roadmaps, summaries, and related digital services.
- To process payments, maintain transaction records, and provide customer support.
- To maintain legal, compliance, security, and business records.
- To improve the clarity and quality of services using non-identifying or aggregated insights where appropriate.

7.2 Categories of data subjects and categories of personal information

Category of data subject	Personal information that may be processed
Parents / guardians / competent persons	Names, contact details, relationship to learner,

	questionnaire answers, observations, consents, correspondence, transaction details
Learners / students	Age band, grade or year, questionnaire responses, learning preferences, strengths, challenges, behavioural or educational observations provided through the authorised intake flow
Adult self-report customers	Names, contact details, questionnaire responses, consent records, service selections, correspondence, transaction details
Website visitors and enquirers	Names, contact details, enquiry content, technical information, cookie or analytics data where enabled
Service providers and contractors	Business names, contact details, invoices, agreements, operational records reasonably required for service delivery

7.3 Recipients or categories of recipients to whom personal information may be supplied

Category of personal information	Recipients or categories of recipients
Order and payment-related information	Payment processors, website commerce providers, accountants or bookkeepers where reasonably necessary
Questionnaire submissions and report delivery data	Website, form, email, storage, and document-delivery providers reasonably necessary to provide the service
Operational and technical records	Hosting, security, analytics, and support providers subject to appropriate confidentiality and access controls
Records disclosed under law	Regulators, courts, law enforcement, or other parties where disclosure is required or permitted by law

7.4 Planned transborder flows of personal information

LearnerLens uses online service providers and digital tools to operate its website, forms, communications, storage, and report-delivery workflows. As a result, personal information may be processed or stored on systems hosted outside South Africa where reasonably necessary to deliver the service. Such flows may include questionnaire submissions, contact details, transactional information, and report files. LearnerLens aims to use service providers that offer appropriate safeguards and will rely on consent and other lawful grounds where required.

7.5 General description of information security measures

- Access to operational systems is restricted to authorised persons on a need-to-know basis.
- Strong passwords, device security, account-level security controls, and platform permissions are used.
- Reasonable technical and organisational measures are used to protect confidentiality, integrity, and availability of personal information.
- Service providers are selected with regard to security features and confidentiality obligations where reasonably possible.
- Records are retained only for as long as reasonably necessary for service, support, legal, or accounting purposes and are then deleted or anonymised where appropriate.

8. How to request access to a record

A requester who seeks access to a record of LearnerLens must complete the prescribed PAIA Form 02 and send it to the Information Officer by email at learnerlensprofile@gmail.com.

- The request should identify the record requested with enough detail to enable LearnerLens to locate it.
- Because LearnerLens is a private body, the requester should state the right the requester is seeking to exercise or protect and explain why the requested record is required for that purpose.
- If the request is made on behalf of another person, proof of authority must be provided.
- LearnerLens will consider the request and respond within the time allowed by PAIA, subject to any lawful extension or grounds for refusal.
- Records may be refused where PAIA permits refusal, including where records contain protected third-party personal information, confidential commercial information, legally privileged content, or other protected categories.

9. Fees

The prescribed request fee for a request to a private body is currently R140.00. Access fees may also apply depending on the nature of the record requested, the form of access, the time reasonably required to search for and prepare the record, and any reproduction or transfer costs.

If applicable, LearnerLens will notify the requester of the prescribed fees before access is provided. The current official PAIA fee structure is published by the Information Regulator and may be updated from time to time.

10. Remedies and complaints

If a requester is dissatisfied with the outcome of a request, or if LearnerLens does not respond within the period allowed by PAIA, the requester may lodge a complaint with the Information Regulator and, where appropriate, approach a court for relief in terms of PAIA.

- PAIA complaints email: PAIAComplaints@inforegulator.org.za
- General enquiries: enquiries@inforegulator.org.za
- Current public contact number: 010 023 5200
- Complaint form: Form 05 prescribed under the PAIA Regulations

11. Availability of this Manual

A copy of this manual is available:

- on the LearnerLens website at www.learnerlens.co once published under the footer link titled 'PAIA Manual';
- from LearnerLens on request by email to learnerlensprofile@gmail.com, subject to any prescribed copying fee that may apply; and
- to the Information Regulator through the eServices portal or on request.

12. Updating of this Manual

LearnerLens will review and update this manual from time to time to reflect changes in the law, business operations, contact details, records held, or personal-information processing practices.

Issued by:

Lizaan Fourie

Information Officer | LearnerLens

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