Vertigras (Pty) Ltd

PAIA Manual

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

Compiled 9 November 2026

1. About this manual

Vertigras (Pty) Ltd (registration number 2024/227320/07) is a private body as defined in PAIA. PAIA gives everyone the right of access to records held by a private body where that record is required to exercise or protect any right. This manual explains what records we hold and how to ask for them.

It is published so that you can:

- see which of our records you can get without making a formal request;
- understand the subjects we hold records on, and the categories of records on each;
- find the records we hold that are available under other legislation;
- contact the person who deals with requests;
- find the Information Regulator's Guide on how to use PAIA; and
- understand how we process personal information, who we share it with, whether it leaves South Africa, and how we secure it.

This manual sits alongside our privacy policy, which explains in more detail how we handle personal information under the Protection of Personal Information Act 4 of 2013 ("POPIA").

2. Contact details

Requests, and any question about this manual, should go to our Information Officer, using the contact details below.

Private body	Vertigras (Pty) Ltd
Registration number	2024/227320/07
Information Officer	Contactable using the details below
Deputy Information Officer	None designated
Email	admin@vertigras.com
Telephone	083 499 6271
Postal and physical address	Greenpark Lifestyle Estate, Block 55 Unit 946, Witfield, Boksburg, Gauteng, 1459, South Africa
Website	vertigras.com

3. The Regulator's Guide to PAIA

The Information Regulator has published a Guide on how to use PAIA, in terms of section 10(1) of PAIA, in an easily understandable form. It is available in each of the official languages and in braille, and it explains the objects of PAIA and POPIA, how to make a request, the fees, and how to complain or appeal if a request is refused.

The Guide is available from the Information Regulator at inforegulator.org.za, or on request from:

- The Information Regulator (South Africa), JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001
- Email: inforeg@inforegulator.org.za

4. Records available without a request

These records can be read or downloaded from vertigras.com at any time. You do not need to make a PAIA request, pay a fee, or give a reason.

Category	Records	How to get them
Legal and compliance	Privacy policy, terms of use, this PAIA manual	On the website
Product information	Descriptions, features, platforms, pricing model and support material for Skedaddle and TomeLodge	On the website, and on each app's store listing
Company information	Registered name, registration number, registered address and contact details	On the website

We have not published a notice under section 52(2) of PAIA listing categories of records that are automatically available. If we do, this manual will be updated.

5. Records held under other legislation

Some of our records are kept because another law requires it. Listing them here does not mean they are open to the public; access is governed by the legislation concerned and by PAIA.

Records	Legislation
Memorandum of incorporation, registers of directors and shareholders, annual returns, minutes and resolutions, accounting records and financial statements	Companies Act 71 of 2008
Tax returns and supporting records	Tax Administration Act 28 of 2011, and the Income Tax Act 58 of 1962
This manual, and records of PAIA requests we receive	Promotion of Access to Information Act 2 of 2000

Privacy policy, records of consent, and records of how we process personal information	Protection of Personal Information Act 4 of 2013
Employment records, where we have employees	Basic Conditions of Employment Act 75 of 1997, and the Labour Relations Act 66 of 1995
Website terms, electronic communications and transaction records	Electronic Communications and Transactions Act 25 of 2002

6. Subjects and categories of records

Subject	Categories of records
Company and statutory	Incorporation and CIPC records, director and shareholder records, resolutions, insurance and licences
Finance	Invoices, receipts, bank records, management accounts, financial statements, tax records
Products and development	Source code, designs, specifications, build and release records, test and quality records, bug reports, technical documentation
Users and support	Account records, support correspondence, bug reports and diagnostic information sent to us
Suppliers and service providers	Contracts, service terms, correspondence, billing records
Marketing and brand	Website content, brand and design assets, store listings, social media content
Legal and compliance	Policies, this manual, PAIA requests and responses, correspondence with regulators
People, where applicable	Contracts with employees or contractors, payroll records, applications for work

7. Processing of personal information

This section sets out the information required by section 51(1)(c) of PAIA. Our privacy policy covers the same ground in more detail.

7.1 Purpose of processing

We process personal information in order to:

- create and secure accounts in our applications, and authenticate people who sign in;
- store and sync the content a person creates, across their own devices;
- deliver, update and support the applications, and honour purchases and subscriptions;
- respond to support queries and other correspondence;
- keep our products and systems secure and free from abuse;
- perform our contracts with suppliers and partners, and to invoice and be paid;

- consider applications for work; and
- comply with our legal obligations and with the rules of the platforms we publish on.

We do not use personal information for advertising or profiling, we do not use it to train artificial intelligence models, and we do not sell it.

7.2 Categories of data subjects and of the information held

Data subjects	Personal information processed
Users of our applications	Email address and a hashed password; the devices they sign in on; purchase records; crash or error reports, where they turn them on; and, for Skedaddle, the content they create and the settings that follow them between devices. For TomeLodge, a person's library and listening stay on their own devices and are not processed by us
Visitors to our website	IP address and request details, in the standard server logs kept by our hosting provider for security
People who contact us for support	Email address, the content of the correspondence, and any diagnostic information or log file they choose to send
Business contacts, suppliers and partners	Names, job titles, work contact details, employer details, contractual and billing information, and correspondence
People who apply to work with us	Name, contact details, curriculum vitae, work history, portfolio or code samples, and our notes on the application

7.3 Recipients of personal information

Information	Recipients
Account details, and Skedaddle's synced content	Supabase, which hosts our accounts and Skedaddle's sync and storage
Website requests and IP addresses	Cloudflare, which hosts our website
Purchase and subscription records	Microsoft, which operates the Microsoft Store and handles payment and billing
Records needed for advice, audit or legal process	Our professional advisers, and courts or regulators where the law requires it

7.4 Transborder flows of personal information

Yes, personal information is processed outside South Africa. Accounts, and Skedaddle's synced content, are hosted by Supabase on Amazon Web Services infrastructure in Europe. Our website is served by Cloudflare from its global network. Storefront, email and business administration services may process limited information elsewhere, including in the United States.

Where personal information is transferred outside South Africa, we rely on the safeguards in section 72 of POPIA. In practice that means the recipient is bound by contractual data protection terms that give effect to principles substantially similar to POPIA and that restrict onward transfer.

7.5 Security measures

We apply reasonable technical and organisational measures, as required by section 19 of POPIA. These include encryption of data in transit using TLS and encryption of stored user content at rest; passwords held only as a secure hash; access rules in our database so that only a person's own signed-in account can reach their content; access controls limiting which personnel can reach account data; encrypted backups; regular software updates and security testing; and written confidentiality obligations on everyone who may come into contact with personal information.

8. How to request a record

1. Complete **Form 2 (Request for Access to Record)**, prescribed by regulation 7 of the PAIA Regulations, 2021. The form is in Annexure A to Government Notice R.757 published in Government Gazette 45057 of 27 August 2021, and is available from the Information Regulator's website.
2. Give enough detail for us to identify the record, and state the form of access and the manner of access you want.
3. State which right you are seeking to exercise or protect, and explain why the record is required to do so. PAIA requires this for a request to a private body.
4. Attach proof of identity, and, if you are requesting on someone else's behalf, proof that you are authorised to do so.
5. Send the form to our Information Officer at admin@vertigras.com, or by post to the address in section 2, and pay the request fee in section 9.

We will decide on the request within **30 days** of receiving it, and tell you in writing. That period may be extended in the circumstances PAIA allows, and we will tell you if it is. If we need an access fee before releasing the record, we will tell you what it is first.

If we refuse, we will give reasons. PAIA does not provide an internal appeal against a private body, so you may complain to the Information Regulator or apply to a court. We may refuse where PAIA requires or allows it, for example to protect someone else's privacy, a third party's commercial information, or our own trade secrets and confidential product information.

If what you want is **your own personal information**, you do not need this process. Email our Information Officer and we will deal with it under POPIA, as described in our privacy policy.

9. Fees

The fees below are those prescribed for private bodies in Annexure B to the PAIA Regulations, 2021. We may not charge more than the prescribed amounts, and they may be amended from time to time by the Minister.

Item	Fee
Request fee, payable with the request	R140.00
Photocopy or printed black-and-white A4 copy	R2.00 per page or part of a page
Copy in computer-readable form, on media you supply	R40.00

Copy in computer-readable form, on media we supply	R60.00
Search and preparation, for each hour or part of an hour after the first hour	R145.00, up to a maximum of R435.00
Deposit, where search and preparation is likely to exceed six hours	One third of the access fee that would be payable
Postage, email or electronic transfer	The actual expense, if any

Annexure B also prescribes fees for records in other formats, such as transcriptions and copies of audio and visual records. We will quote those from the Annexure if they apply.

10. Availability of this manual

A copy of this manual is available:

- on this website, at vertigras.com/paia, and as a PDF to download;
- to any person on request to our Information Officer, on payment of the prescribed fee for a photocopy in Annexure B to the PAIA Regulations, 2021; and
- to the Information Regulator on request.

We review this manual at least once every 12 months. The date it was last compiled is shown at the top of this page.