PAIA / POPIA Manual

Prepared in terms of section 51 of the Promotion of Access to Information Act 2 of 2000 (as amended). Version 2026-09-28.

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1. List of acronyms and abbreviations

- **CEO** — Chief Executive Officer
- **DIO** — Deputy Information Officer
- **IO** — Information Officer
- **PAIA** — Promotion of Access to Information Act 2 of 2000 (as amended)
- **POPIA** — Protection of Personal Information Act 4 of 2013
- **Regulator** — the Information Regulator (South Africa)
- **Organization** — a school, academy, or club that subscribes to Vantic and enters its own players' and staff's data (the "Responsible Party" under POPIA for that data)
- **Republic** — the Republic of South Africa

2. Purpose of this Manual

This Manual is provided so that members of the public and Vantic's Organizations can:

- check what categories of records Vantic holds without needing to submit a formal request;
- understand how to request access to a record Vantic holds;
- find the contact details of Vantic's Information Officer and Deputy Information Officer(s), if any;
- understand why Vantic processes personal information, who it's processed about, and what categories of information are involved;
- know who personal information may be shared with, whether it's transferred outside South Africa, and what security measures protect it.

3. Key contact details

3.1 Information Officer

Name: Diederik Jurgens Vos Maartens — under POPIA section 55, the head of a private body is its Information Officer by default
Title: Founder & Chief Executive Officer
Tel: 079 213 6202
Email: hello@vantic.co.za

3.2 Deputy Information Officer

Not yet designated — Vantic is currently a single-founder company.

3.3 General contact

Email: hello@vantic.co.za

3.4 Registered office

Postal address: 68-82 Steenloper Street, Monumentpark, Pretoria, Gauteng, South Africa
Physical address: 68-82 Steenloper Street, Monumentpark, Pretoria, Gauteng, South Africa
Website: vantic.co.za
Company legal name: Vantic (Pty) Ltd. Registration number: 2026/765066/07.

4. Guide on how to use PAIA

The Information Regulator has published a Guide, in terms of section 10(1) of PAIA, explaining the objects of PAIA and POPIA, how to request access to a record, and what remedies (internal appeal, complaint to the Regulator, or court application) are available. The Guide is available in each official language and in braille.

The Guide can be obtained by request to Vantic's Information Officer (contact details above), or directly from the Regulator:

- Email: inforeg@justice.gov.za
- Website: justice.gov.za/inforeg

5. Records available without a request

The following are publicly available on vantic.co.za without needing a formal PAIA request:

Category of record	Type	Available on website
This Manual	PAIA/POPIA Manual	Yes
Terms of Service	Legal terms	Yes
Privacy Policy	Legal policy	Yes
Pricing	Product/pricing information	Yes

6. Records available under other legislation

Category of record	Applicable legislation
Memorandum of Incorporation	Companies Act 71 of 2008
This PAIA Manual	Promotion of Access to Information Act 2 of 2000
Tax records	Tax Administration Act 28 of 2011 [once applicable]

7. Subjects on which Vantic holds records, and categories of records held

Subject	Categories of records
Organization accounts	Organization name, subscription/plan status, billing records (once PayFast is live)

Staff (coaches/S&C)	Name, email, role, assigned teams
Players	Name, date of birth, gender, age group, team/sport, position
Performance data	Physical test results across speed/power/strength/endurance/body composition/sport-specific batteries
Wellness data	Daily sleep, fatigue, soreness, stress, and mood scores
Injury/recovery data	Injury description, dates, return-to-training/return-to-play timelines, rehab guidance and notes
Financial	Company financial and tax records [once applicable]

8. Processing of personal information

8.1 Purpose of processing

Vantic processes personal information to operate the platform for its Organizations: performance testing, scoring and benchmarking, wellness monitoring, injury/return-to-play tracking, and automatic training program generation. Vantic processes this information as an **Operator** under POPIA, on the instructions of each Organization, which is the **Responsible Party** for its own players' and staff's data. See the Privacy Policy for the full explanation of this relationship.

8.2 Categories of data subjects and personal information processed

Category of data subject	Personal information processed
Organization staff (coaches, S&C)	Name, email, role, assigned teams
Players (predominantly minors)	Name, date of birth, gender, age group, team/position, physical test results, wellness scores, injury/recovery records — see section 4 of the Privacy Policy on how consent for this is obtained via the Organization

8.3 Recipients of personal information

Category of personal information	Recipient
All platform data (database, authentication, file storage)	Supabase (sub-processor, hosting infrastructure)
Billing information only — never player data	PayFast (payment processor, once billing is live)

Personal information is never shared between different Organizations using Vantic.

8.4 Planned transborder flows of personal information

Vantic's production data is hosted with Supabase in the eu-north-1 (Stockholm, Sweden) AWS region — personal information is transferred outside South Africa for processing and storage, as described in the Data Processing Addendum.

8.5 Information security measures

Real measures in place, verified 2026-08-12:

- Row-level security enforced at the database level across every table holding player/organization data (31 tables, 88 policies) — one Organization's staff cannot access another Organization's data.
- All server-side functions performing privileged actions verify the caller's identity first.
- Data encrypted in transit (HTTPS/TLS).
- No passwords or API keys stored in application source code.

Data is encrypted at rest (AES-256) via Supabase's own infrastructure — automatic, requiring no separate configuration. Multi-factor authentication is not yet enforced for Vantic staff accounts, though the underlying platform (Supabase Auth) supports it — a real, currently open gap, not yet on a committed timeline.

9. Availability of this Manual

A copy of this Manual is available:

- on vantic.co.za;
- at Vantic's registered office (68-82 Steenloper Street, Monumentpark, Pretoria, Gauteng, South Africa), for inspection during normal business hours;
- to any person on request, subject to a reasonable prescribed fee for photocopies, per the PAIA Regulations; and
- to the Information Regulator on request.

10. Updating this Manual

Vantic's Information Officer will review and update this Manual on a regular basis, and whenever the categories of personal information processed or the purposes of

processing materially change.

Issued by: Diederik Jurgens Vos Maartens, Founder & Chief Executive Officer