8 Gates AI — PAIA and POPIA Manual

Prepared under section 51 of the Promotion of Access to Information Act 2 of 2000 (PAIA), and setting out how I process personal information under the Protection of Personal Information Act 4 of 2013 (POPIA).

Last updated 30 October 2026 | Version: 1.2

1. About this manual

1.1 This manual is published by Mario Jansen, a sole proprietor trading as 8 Gates AI ("8 Gates AI", "I", "me"). 8 Gates AI provides AI systems and automation services to business owners. It is a private body under PAIA, and this manual is prepared under section 51 of PAIA.

1.2 This manual helps you to: (a) find my contact details and the details of my Information Officer; (b) find out where to get the Information Regulator's PAIA Guide; (c) see which records are available without a formal request; (d) see the categories of records I hold; (e) understand how to request access to a record, and the fees involved; (f) know the grounds on which a request may be refused, and your remedies; and (g) understand how I process personal information, including the purposes, the people and information involved, who receives it, transfers outside South Africa and how I keep it secure.

1.3 In this manual: "PAIA Regulations" means the Regulations relating to the Promotion of Access to Information, 2021; "Regulator" means the Information Regulator (South Africa); "record" means any recorded information in my possession or under my control, in any form; and "personal requester" means a person asking for a record that contains personal information about that person.

2. My details and Information Officer

Item	Details
Private body	Mario Jansen, a sole proprietor trading as 8 Gates AI
Head of the private body and Information Officer	Mario Jansen (Information Officer registration number 2026-069606, registered with the Information Regulator from 19 October 2026)
Deputy Information Officer	None appointed
Physical and postal address	93 Bergsig Garden Village, Springfontein St, Durbanville, 7550, South Africa
Email	8gatesai@gmail.com
Phone	071 882 5780 (WhatsApp messages only, no calls)
Website	mariojansen.com

2.2 Because 8 Gates AI is a sole proprietorship, Mario Jansen is the head of the private body under PAIA and, under POPIA, its Information Officer. All PAIA requests and POPIA enquiries should be sent to him at the contact details above. Mario Jansen is registered with the Information Regulator as the Information Officer of 8 Gates AI (registration number 2026-069606, from 19 October 2026).

3. The Regulator's PAIA Guide (section 10)

3.1 The Regulator has updated and published a Guide on how to use PAIA, as section 10 of PAIA requires. The Guide explains, in plain language, how to exercise the rights in PAIA and POPIA, including how to make a request for a record, the fees involved, the help available from Information Officers and the Regulator, and the remedies available if a request is refused.

3.2 The Guide is available in all eleven official languages: (a) on the Regulator's website, inforegulator.org.za (PAIA Guidelines page); (b) from the Regulator, on request; and (c) from me. You may ask my Information Officer for a copy, by email or using Form 1 of the PAIA Regulations. I will email you an electronic copy free of charge, and you may inspect a copy in English and Afrikaans at my address by appointment.

3.3 The Regulator's contact details are:

Contact	Details
Website	inforegulator.org.za
General enquiries	enquiries@inforegulator.org.za
PAIA complaints	PAIAComplaints@inforegulator.org.za
POPIA complaints	POPIAComplaints@inforegulator.org.za
Phone	010 023 5200; toll-free 0800 017 160
Physical address	Woodmead North Office Park, 54 Maxwell Drive, Woodmead, Johannesburg, 2191
Postal address	P.O. Box 31533, Braamfontein, Johannesburg, 2017

4. Records available without a request

4.1 The following records are freely available on my website, without a PAIA request or fee: (a) my Website Terms and Conditions; (b) my Privacy Policy; (c) this manual; and (d) general information about my services. A copy of my standard Client Service Agreement is available free of charge on request before you sign.

4.2 I have not published a notice under section 52(2) of PAIA. The records in 4.1 are simply made freely available.

5. Records kept under other laws

5.1 I keep records as required by the laws below, to the extent that they apply to 8 Gates AI. This list is not complete, and a record listed here is not automatically available: access is still subject to PAIA.

Law	Records
Tax Administration Act 28 of 2011	Records, books of account and documents relevant to tax, kept for 5 years
Income Tax Act 58 of 1962	Income and expense records, tax returns and assessments
Value-Added Tax Act 89 of 1991	Tax invoices and VAT records, only if and while 8 Gates AI is registered for VAT
Basic Conditions of Employment Act 75 of 1997; Unemployment Insurance Act 63 of 2001; Unemployment Insurance Contributions Act 4 of 2002; Compensation for Occupational Injuries and Diseases Act 130 of 1993	Employment, payroll and contribution records, only if and when I employ staff

Consumer Protection Act 68 of 2008	Quotes, consumer agreements, bookings, cancellations, refunds and other transaction records
Electronic Communications and Transactions Act 25 of 2002	Website disclosures under section 43 and records of electronic transactions
Protection of Personal Information Act 4 of 2013	Records of processing, consents, objections, opt-outs, operator agreements and security incidents
Promotion of Access to Information Act 2 of 2000	This manual, PAIA requests and decisions
Companies Act 71 of 2008	Not applicable: 8 Gates AI is a sole proprietorship, not a company

6. Categories of records I hold

Subject	Categories of records
Clients and their staff	Client Service Agreements, order forms and operator agreements; contact and billing details; AI Quick Start intake files (answers, screenshots and files); project files, notes and hours logs; communications
Finance	Invoices, receipts, proof of payment, bank, Wise and PayPal records, accounting records and tax records
Leads and enquiries	Lead lists (business contact details from public sources), consent requests and replies, opt-out records and enquiry messages
Website	Website form entries (bookings, enquiries and intake forms), server logs, spam-protection data and website backups
Communications	Emails, WhatsApp messages and meeting notes
Suppliers and service providers	Supplier terms and agreements, invoices and contact details
Business administration	This manual, my policies, POPIA and PAIA records, and records of intellectual property

7. How to request access to a record

7.1 Requests must be made on Form 2 (Request for Access to Record) of the PAIA Regulations. The form is available on the Regulator's website (PAIA Forms page) or from me on request.

7.2 Send the completed form to the Information Officer by email to 8gatesai@gmail.com, or deliver or post it to 93 Bergsig Garden Village, Springfontein St, Durbanville, 7550, South Africa.

7.3 The form must: (a) give enough detail to identify you and the record you want; (b) state the form of access you want (for example an electronic copy); (c) give an email or postal address where I can contact you; (d) identify the right you want to exercise or protect, and explain why you need the record to do so (section 53 of PAIA); and (e) if you are asking on behalf of someone else, include proof of your authority to do so. If you need help completing the form, contact the Information Officer.

7.4 I will decide on your request within 30 days of receiving it. I may extend this period once, by up to 30 more days, in the circumstances allowed by section 57 of PAIA, and will tell you if I do. If

I do not respond within the time allowed, the request is regarded as refused (section 58 of PAIA). I will tell you my decision, and any access fee, using Form 3.

7.5 If the record contains information about another person or business, I may have to notify them and give them a chance to make representations before I decide (section 71 of PAIA).

8. Fees

8.1 The fees for private bodies are prescribed in Annexure B to the PAIA Regulations. A request fee is payable by every requester except a personal requester, and must be paid before I process the request. If access is granted, an access fee may be payable for search, preparation and reproduction, and I may withhold the record until it is paid. If the search and preparation is likely to take more than 6 hours, I may ask for a deposit of one third of the access fee.

Item	Fee
Request fee (not payable by a personal requester)	R140.00
Photocopy or printed black and white copy, per A4 page or part of a page	R2.00
Printed copy, per A4 page or part of a page	R2.00
Copy in computer-readable form on a flash drive (provided by the requester)	R40.00
Copy on compact disc: provided by the requester / provided by me	R40.00 / R60.00
Transcription or copy of visual images	Outsourced; at the service provider's quoted cost
Transcription of an audio record, per A4 page	R24.00
Copy of an audio record on flash drive (provided by the requester), or on compact disc (provided by the requester / provided by me)	R40.00; R40.00 / R60.00
Search and preparation, per hour or part of an hour after the first hour	R145.00, up to a total of R435.00
Deposit, if the search exceeds 6 hours	One third of the access fee
Postage, email or other electronic transfer	Actual cost, if any

8.2 Source: Annexure B (Fees in respect of private bodies) to the Regulations relating to the Promotion of Access to Information, 2021, published in Government Gazette 45057 on 27 August 2021, as shown on the Regulator's PAIA Fees Structure page. If the prescribed fees change, the fees in force on the date of your request apply.

9. Personal information requests under POPIA

9.1 You may ask me, free of charge, to confirm whether I hold personal information about you (section 23 of POPIA). A request for a copy or description of that information follows the PAIA procedure in this manual; as a personal requester you do not pay the request fee, but an access fee may apply.

9.2 You may ask me to correct or delete your personal information, or object to its processing, using Form 2 or Form 1 of the POPIA Regulations, or simply by emailing 8gatesai@gmail.com.

10. Grounds for refusal

10.1 I may or must refuse access on the grounds set out in Chapter 4 of Part 3 of PAIA, which include where disclosure would:

(a) unreasonably disclose personal information about another individual, including a deceased individual (section 63);

(b) disclose another party's trade secrets, or financial, commercial, scientific or technical information that would harm its interests, or information supplied to me in confidence (section 64);

(c) breach a duty of confidence I owe to another party under an agreement (section 65);

(d) endanger anyone's life or physical safety, or the security of property, buildings, systems or means of transport (section 66);

(e) disclose a record that is protected from production in legal proceedings, such as confidential communications with legal advisers, unless that protection has been waived (section 67);

(f) disclose my own trade secrets, or financial, commercial, scientific or technical information (including computer programs I own) that would harm my commercial or financial interests or put me at a disadvantage in negotiations or competition (section 68); or

(g) disclose research information of another party or of 8 Gates AI that would expose the research, the researcher or the subject matter to serious disadvantage (section 69).

10.2 Despite these grounds, I must grant access where section 70 of PAIA requires disclosure in the public interest. If a record cannot be found or does not exist, I will tell you so, with the steps I took to find it (section 55 of PAIA). If part of a record may be refused, I will give access to the rest where it can reasonably be separated.

11. Remedies

11.1 PAIA does not provide an internal appeal against a decision of a private body.

11.2 If you are not satisfied with my decision on your request (including a refusal, the fees, an extension of time or the form of access), you may, within 180 days of being notified of the decision: (a) lodge a complaint with the Regulator, using Form 5 of the PAIA Regulations, by email to PAIAComplaints@inforegulator.org.za or through the Regulator's eServices portal; or (b) apply to a court with jurisdiction for appropriate relief (sections 77A and 78 of PAIA).

11.3 Complaints about how I process personal information may be lodged with the Regulator at POPIAComplaints@inforegulator.org.za, using Form 5 of the POPIA Regulations. Please contact me first so that I can try to resolve your concern.

12. Processing of personal information (POPIA)

12.1 Purposes. I process personal information to: (a) respond to enquiries and prepare quotes; (b) take and manage bookings, including the AI Quick Start, and check that a booking fits; (c) deliver my services, support and AI plans to clients; (d) invoice, receive payments and issue refunds; (e) keep financial and other records the law requires; (f) contact business leads, ask for consent to marketing and honour opt-outs (section 69 of POPIA); (g) run, secure and back up my website and protect my forms from spam; (h) produce content that a client requests, with documented consent; (i) process my clients' customers' information, as an operator on the client's instructions; and (j) protect my legal rights and comply with the law.

12.2 Data subjects and their information. The data subjects below include individuals and, where POPIA applies to them, businesses (juristic persons).

Data subjects	Categories of personal information
Website visitors	IP address, browser and device type, pages viewed and referring site (server logs), and spam-check signals
Enquirers and AI Quick Start bookers	Name, business name, email, phone or WhatsApp number, messages, intake form answers and business profile, screenshots and files, and payment details (payer name, amount, reference and proof of payment; I do not receive full card details)
Clients and their staff	Contact and billing details, agreements and order forms, communications, meeting notes, hours logs, payment records, and the access details needed for the work
Business leads	Name, job title, business name, business email or phone from public business sources, notes on contact, and consent and opt-out records
Referrers	The referrer's name, as given to me by a client
People in content	Images, video, voice and likeness, and consent records
Clients' customers	Information in the client's systems that I process as the client's operator, as set out in the operator agreement
Suppliers and service providers	Contact person details, billing and banking details, and agreements

12.3 Recipients. I share personal information only as needed, with: (a) service providers that process it on my behalf under contracts or terms requiring confidentiality and security, including providers of cloud email, calendar and document storage, AI services, online meetings, messaging, website hosting and backups, website forms and spam protection, payment services (banks, Wise and PayPal), social media scheduling and design, and secure credential storage; (b) my clients, for information about their own business and customers; (c) professional advisers, such as an attorney or accountant; and (d) the South African Revenue Service, the Regulator, courts or other authorities, where the law requires it. I do not sell personal information.

12.4 Planned transfers outside South Africa (section 72). My website, its form entries and its backups are hosted only on Afrihost's servers in South Africa. The service providers below are based in, or may store data in, the United States, the European Union, the United Kingdom or other countries outside South Africa:

Provider	What it is used for
Google (Gmail, Google Drive, Google Calendar)	Email (including website form notification emails sent through Gmail), document storage and scheduling
Wise	EFT payments and receipts
PayPal	Card payments
Cloudflare Turnstile	Spam and bot checks on my website forms
WhatsApp (Meta)	WhatsApp messages, including chats started through the Click to Chat button on my website

AI tools used for client work	AI assistants and automation platforms used to draft, summarise, transcribe and organise information, and to build client systems
Other cloud tools	Online meetings, design and social media scheduling, and the encrypted password manager

12.5 I make these transfers only where section 72 of POPIA allows them: where the recipient is bound by law, binding corporate rules or a binding agreement that gives protection substantially similar to POPIA; where the data subject consents; where the transfer is necessary to perform a contract with the data subject or to take steps at their request; or where the transfer is for the data subject's benefit. Where a tool lets me switch off training of AI models on my data, I do.

12.6 Security measures. I take appropriate, reasonable technical and organisational measures (section 19 of POPIA), including: an encrypted password manager with strong, unique passwords; two-factor authentication; access control, so that access is limited to what the work needs and removed when the work ends; devices protected by a password or PIN screen lock, automatic security updates and antivirus or malware protection; regular website backups; spam and bot protection on my forms; and written operator agreements with my clients. If I believe personal information has been accessed by an unauthorised person, I will notify the people affected and the Regulator as section 22 of POPIA requires.

12.7 Retention. I keep personal information only for as long as needed, as follows (I may keep it longer where the law requires it or for a legal claim):

Information	Retention
Client project data	Until project completion and full hand-over, then deleted
Client contact details and project records	2 years after project completion
Invoices, payment records, signed agreements and financial records	5 years, as required by the Tax Administration Act 28 of 2011
Leads and enquiries that do not become clients	Deleted 6 months after collection or after the last contact (whichever is later); opt-out records are kept so that I can honour them
AI Quick Start intake answers, screenshots and files	Deleted 90 days after the AI plan is delivered, unless the client signs up for a package within that time
Referrer names	Deleted 6 months after collection
Website server logs and spam-protection data	Up to 90 days, unless needed longer to investigate a security incident
Website backups (kept only on Afrihost's servers in South Africa)	30 days, after which backups are deleted

13. Availability of this manual

13.1 This manual is available on my website, mariojansen.com, and on request from the Information Officer at 8gatesai@gmail.com, free of charge. A copy may also be inspected at my address by appointment, and I will give a copy to the Regulator on request.

14. Version and updates

14.1 I review this manual at least once a year and whenever my records or processing change materially. The current version is published on my website.

Version	Date	Change
1.0	19 October 2026	First version
1.1	19 October 2026	Added the Information Officer's registration number with the Information Regulator (2026-069606)
1.2	30 October 2026	Wording changed to the first person (a solo-run business); no change of substance

Contact: Information Officer, 8 Gates AI — 8gatesai@gmail.com — 93 Bergsig Garden Village, Springfontein St, Durbanville, 7550, South Africa