

PAIA MANUAL

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

Praxis Marketing Consultancy (Pty) Ltd t/a Axario (“Axario”)

Registration Number: 2025/558202/07

Effective Date: 7 October 2026

Last Updated: 7 October 2026

1. List of Acronyms and Abbreviations

For purposes of this Manual:

Axario means Praxis Marketing Consultancy (Pty) Ltd t/a Axario.

Information Officer / IO means the Information Officer of Axario.

PAIA means the Promotion of Access to Information Act 2 of 2000, as amended.

POPIA means the Protection of Personal Information Act 4 of 2013.

Regulator means the Information Regulator of South Africa.

Responsible Party and **Operator** have the meanings assigned to them in POPIA.

2. Purpose of this Manual

This Manual has been prepared in accordance with section 51 of PAIA.

The purpose of this Manual is to:

- describe the records held by Axario;
- explain which records may be accessed without a formal PAIA request;
- explain how a person may request access to a record held by Axario;
- identify the contact details of the person responsible for PAIA requests;
- describe the categories of personal information processed by Axario;
- identify the purposes for which personal information is processed;
- describe the categories of data subjects and recipients of personal information;
- describe cross-border flows of personal information, where applicable; and
- provide a general description of the security safeguards implemented by Axario.

PAIA gives a requester a right of access to records held by a private body where the record is required for the exercise or protection of a right, subject to the provisions and limitations of PAIA.

3. Details of Axario

The legal entity operating Axario is:

Praxis Marketing Consultancy (Pty) Ltd t/a Axario

Registration Number: 2025/558202/07

Registered and Physical Address:

44 Old Kent Drive
Midstream Estate
Olifantsfontein
Gauteng
1692
South Africa

Website: www.axario.co.za

General Email: ask@axario.co.za

Axario currently provides:

- **Axario Home**, for household and family information management; and
- **Axario Business**, for asset, maintenance, compliance, contractor, work-order and related business information management.

4. Information Officer

The Information Officer responsible for PAIA and POPIA matters is:

Name: Tanya Butler

Email: tanya@axario.co.za

Telephone: +27 61 509 4992

PAIA requests, requests for assistance and other access-to-information enquiries may be directed to the Information Officer.

Axario has not appointed a Deputy Information Officer at the date of publication of this Manual. Should such an appointment be made, this Manual will be updated accordingly.

5. Guide on How to Use PAIA

The Information Regulator has published a Guide in terms of PAIA to assist persons who wish to exercise rights under the Act.

The Guide contains information regarding:

- the purpose of PAIA;
- how to request access to records;
- the forms that must be used;
- applicable fees;
- remedies available where access is refused; and
- how to lodge a complaint with the Information Regulator.

The Guide and prescribed PAIA forms are available from the Information Regulator. The Regulator currently publishes **Form 2 – Request for Access to Record** for access requests.

The Guide is also available in multiple official languages.

6. Records Available Without a Formal PAIA Request

Certain records may be made available by Axario without requiring the requester to submit a formal PAIA request.

These may include:

- information published on Axario's website;
- Website and Application Privacy Policy & POPIA Notice;
- Cookie Policy;
- Terms of Service;
- product and service information;
- pricing or subscription information published by Axario;
- security and privacy information intentionally made public;
- contact information;
- company registration information that is publicly available;
- marketing and promotional material; and
- other records intentionally published by Axario.

The availability of a record without a formal PAIA request does not prevent Axario from protecting confidential, proprietary or personal information contained in related records.

7. Records Held in Terms of Other Legislation

Axario may hold records required under legislation applicable to its operations.

This may include, where applicable:

- Companies Act 71 of 2008;
- Promotion of Access to Information Act 2 of 2000;
- Protection of Personal Information Act 4 of 2013;
- Electronic Communications and Transactions Act 25 of 2002;
- Consumer Protection Act 68 of 2008;
- Income Tax Act 58 of 1962;
- Tax Administration Act 28 of 2011;
- Value-Added Tax Act 89 of 1991, where applicable;
- Basic Conditions of Employment Act 75 of 1997, if and when Axario employs staff;
- Labour Relations Act 66 of 1995, if applicable;
- Unemployment Insurance Act 63 of 2001, if applicable;
- Compensation for Occupational Injuries and Diseases Act 130 of 1993, if applicable; and
- any other legislation applicable to Axario's operations from time to time.

The inclusion of legislation in this section does not mean that every category of record contemplated by that legislation is necessarily held by Axario.

8. Subjects and Categories of Records Held by Axario

Axario may hold the following categories of records.

8.1 Corporate and Governance Records

- company registration records;
- statutory company records;
- director records;
- resolutions and approvals;
- governance documents;
- policies and procedures;
- compliance records; and
- regulatory correspondence.

8.2 Financial and Accounting Records

- invoices;
- subscription and billing records;
- accounting records;
- tax records;
- bank-related records;
- payment records;
- financial statements where applicable; and
- records required for statutory retention.

8.3 Customer and User Records

- account registration information;
- customer contact details;
- subscription information;
- billing information;
- support enquiries;
- correspondence;
- account settings;
- authentication records;
- login information;
- access and activity records;
- complaints or requests;
- service and transactional email-delivery records; and
- records of service communications, where applicable.

8.4 Axario Home Records

Depending on the information entered by users, records may include:

- household member information;
- names and relationships;
- dates of birth;
- identity information;
- addresses and contact information;
- emergency contact details;
- medical and health information;
- medical aid details;
- medication information;

- household documents;
- insurance information;
- reminders;
- photographs;
- voice recordings and transcripts;
- attachments;
- household expense records;
- home running costs;
- home improvement records and costs;
- insurance values;
- receipts and supporting records;
- related household financial, property and expense-management records;
- free-text notes; and
- information relating to children.

8.5 Axario Business Records

Records may include:

- workspace and organisation records;
- customer records;
- contractor and service-provider information;
- asset records;
- site information;
- maintenance records;
- work orders;
- inspections;
- compliance records;
- certificates;
- incidents and corrective actions;
- photographs and attachments;
- audit records;
- location information connected to certain asset actions;
- access records; and
- operational records.

8.6 Technology and Security Records

Records may include:

- system logs;
- access logs;
- audit trails;
- device and browser information;
- error and diagnostic information;
- security alerts;
- authentication records;
- backup records;
- incident-response records;
- data-breach records;
- limited Axario Home usage-event records;

- application installation-event records; and
- anonymous aggregated usage statistics.

Axario Home maintains limited first-party usage records for operational, service-performance and product-improvement purposes. These records may include one application-open event per session, application installation events and whether certain features, including Search and Ask Axario, have been used. The content of searches, questions submitted through Ask Axario, household information and page-to-page navigation are not recorded for these usage-measurement purposes.

Axario Business does not maintain equivalent usage-event analytics. It does, however, maintain audit trails and operational records showing actions performed within the platform, including who performed an action, what action was performed and when. These records are maintained for operational, security, accountability and compliance purposes and are not used as usage analytics.

8.7 Service Provider and Operator Records

- contracts;
- Data Processing Agreements;
- Operator Agreements;
- service-level agreements;
- vendor due-diligence records;
- privacy and security documentation;
- sub-processor information; and
- service-provider correspondence.

8.8 Website, Marketing and Attribution Records

Records may include:

- website enquiries, demonstration requests and related correspondence;
- website service and transactional email-delivery records;
- marketing preferences;
- direct-marketing consent records;
- opt-out records;
- campaign and referral information;
- UTM campaign information;
- landing-page and referring-site information;
- advertising click identifiers, where applicable;
- cookie-consent and cookie-preference information, including information associated with the axario_consent cookie;
- campaign and referral attribution information, including information associated with the axario_attr cookie;
- Google Analytics 4 information;
- Meta Pixel information;
- LinkedIn Insight Tag information; and
- Google Tag Manager information.

8.9 Privacy and Compliance Records

- Personal Data Inventory;
- privacy notices;

- POPIA policies;
- PAIA records;
- data-subject requests;
- objection and opt-out records;
- PIAs;
- security assessments;
- breach records;
- operator assessments;
- section 72 cross-border assessments; and
- compliance review records.

8.10 Employee Records

Axario currently has **no employees**.

Employment and human-resources records are therefore not currently maintained as an active processing category.

Should Axario commence recruitment or employ staff, this Manual and the applicable privacy and compliance records will be updated accordingly.

9. Processing of Personal Information

Axario processes personal information in accordance with POPIA.

9.1 Purposes of Processing

Personal information may be processed for purposes including:

- providing and operating Axario Home and Axario Business;
- administering user accounts;
- managing subscriptions and billing;
- storing and organising information supplied by users;
- enabling household expense, property, insurance and financial-recordkeeping functionality;
- providing asset, maintenance, compliance and operational functionality;
- enabling household and workspace collaboration;
- providing reminders and notifications;
- providing application functionality;
- operating AI-assisted features;
- providing customer service and support;
- fraud prevention and platform security;
- technical troubleshooting;
- maintaining, troubleshooting and improving the security, performance and functionality of the platform;
- measuring limited usage of Axario Home for operational, service-performance and product-improvement purposes;
- understanding how users discover or are referred to Axario and measuring the effectiveness of marketing, advertising, referral and campaign activities, where applicable and subject to required consent;
- legal and regulatory compliance;
- managing privacy and access requests;

- maintaining logs and audit trails for operational, security and compliance purposes;
- managing security incidents;
- direct marketing where permitted; and
- Axario's own business administration.

10. Categories of Data Subjects

Axario may process information relating to:

- website visitors;
- prospective customers;
- customers;
- account holders;
- Axario Home household members;
- children recorded as household members;
- Axario Business users;
- employees and representatives of Axario Business customers;
- contractors;
- service providers;
- customer representatives;
- directors and representatives of legal entities;
- persons appearing in uploaded records, photographs or documents;
- emergency contacts;
- beneficiaries or other persons named in household records;
- users of optional integrations; and
- persons communicating with Axario.

11. Categories of Personal Information

Depending on the service and context, Axario may process:

- identifying information;
- contact information;
- account information;
- authentication information;
- financial and billing information;
- identity numbers;
- dates of birth;
- household and relationship information;
- household expense and home running cost information;
- home improvement and property-related financial information;
- photographs;
- health and medical information;
- medical aid information;
- insurance information, including insurance values;
- education-related information;
- asset and property information;
- work and contractor information;
- location information;
- voice recordings;
- transcripts;

- documents, receipts and attachments;
- technical and device information;
- IP addresses or, where applicable, encoded representations derived from IP addresses using protected technical safeguards, depending on the relevant processing activity;
- usage-event information;
- application installation-event information;
- audit logs;
- cookie and consent information;
- campaign and referral attribution information;
- UTM campaign information;
- landing-page and referring-site information;
- advertising click identifiers, where applicable; and
- correspondence.

12. Recipients of Personal Information

Personal information may, where necessary, be disclosed or made available to:

- authorised Axario users;
- household members according to their permissions;
- workspace members;
- contractors where authorised;
- Axario's Information Officer;
- technical administrators;
- professional advisers;
- regulators and public bodies where required by law; and
- operators, service providers and third-party platforms supporting Axario's services.

Service providers and third-party platforms used by Axario, depending on the services and features enabled, may include:

- Supabase and related AWS infrastructure;
- Lovable;
- Google, including Google Maps, Geocoding and Routes services, where applicable;
- Google Gemini;
- OpenAI;
- Firebase;
- Google Calendar;
- Google Analytics;
- Meta, including Meta Pixel;
- LinkedIn, including LinkedIn Insight Tag;
- Pystack, for payment processing in South African Rand;
- Paddle, for international payment and subscription processing;
- Google Play Billing, for applicable in-app purchases and subscription payments;
- Apple, including Sign in with Apple for Axario Home;
- Microsoft, including Microsoft sign-in for Axario Business;
- WhatsApp, where an Axario Business user chooses to use WhatsApp sharing functionality; and
- other service providers used to operate and support Axario.

The particular information disclosed or made available to a service provider or third-party platform will depend on the relevant service or functionality. Axario seeks to limit personal information disclosed to such providers to information reasonably necessary for the relevant processing purpose.

Where a service provider processes personal information on Axario's behalf as an Operator, Axario will take reasonable steps to assess the provider's privacy and security measures and to implement the appropriate confidentiality, security and written contractual safeguards required under POPIA where the provider acts as an Operator.

Some third-party providers may process personal information for their own purposes or may act as independent Responsible Parties in relation to particular services. Where applicable, their processing will also be subject to their own privacy terms and legal obligations.

Axario does not sell personal information to third parties.

13. Cross-Border Flows of Personal Information

Some service providers used by Axario may store or process personal information outside South Africa.

Where personal information is transferred outside South Africa, Axario will seek to ensure that the transfer is undertaken in accordance with **section 72 of POPIA**.

This may include reliance on:

- an adequate level of protection in the recipient country;
- binding contractual protections;
- an agreement providing substantially similar protection;
- consent where legally appropriate; or
- another lawful ground recognised by POPIA.

Axario will maintain records of relevant processing locations and contractual safeguards as part of its data inventory and operator-management process.

14. General Description of Information Security Measures

Axario implements reasonable technical and organisational safeguards designed to protect personal information against loss, damage, unauthorised destruction, unlawful access or unauthorised processing.

Measures may include:

- encryption in transit using HTTPS/TLS;
- encryption at rest through applicable infrastructure providers;
- authentication controls;
- role-based access controls;
- household and workspace separation;
- database-level access controls;
- restricted administrative access;
- logging and audit trails;
- security monitoring;

- backups;
- secure cloud infrastructure;
- incident-response procedures;
- removal of embedded image metadata, including GPS/EXIF metadata, from new photograph uploads;
- Data Breach Management procedures;
- operator and vendor security assessments; and
- regular review of security safeguards.

Axario reviews security measures in light of technological developments and the nature of the information processed.

15. Retention and Destruction of Records

Axario retains personal information and other records only for as long as reasonably necessary for the purpose for which they were collected or subsequently processed, or as required or permitted by applicable law, contractual obligations or legitimate operational, security and compliance requirements.

Different retention periods may apply to different categories of records. Axario applies documented retention and deletion periods to relevant categories of records and periodically reviews records that have become eligible for deletion or destruction.

Certain records may be retained for longer where reasonably necessary in connection with an unresolved complaint, dispute, security matter, legal requirement or other lawful retention purpose.

Where records containing personal information are no longer required for an authorised purpose, Axario will delete, destroy or, where appropriate, de-identify the information in accordance with its applicable retention and deletion processes.

16. How to Request Access to a Record

A person wishing to request access to a record held by Axario must submit the prescribed [Form 2 – Request for Access to Record](#).

The Information Regulator currently prescribes Form 2 for PAIA access requests.

The completed request should be submitted to:

Information Officer: Tanya Butler

Email: tanya@axario.co.za

Telephone: +27 61 509 4992

Address: 44 Old Kent Drive, Midstream Estate, Olifantsfontein, Gauteng, 1692

The requester must provide sufficient information to enable Axario to:

- identify the requester;
- identify the record requested;
- understand the form in which access is required;
- communicate with the requester; and

- determine the right which the requester seeks to exercise or protect and why access to the record is required for that purpose.

17. Requests for Personal Information under POPIA

A data subject may exercise any applicable rights relating to their personal information in terms of POPIA.

Before providing access to personal information, Axario may require adequate proof of identity to verify the requester.

Requests relating to personal information may, where applicable, be submitted using the prescribed forms issued by the Information Regulator from time to time.

Where Axario processes personal information solely in its capacity as an Operator, any request relating to personal information under the control of a customer acting as the Responsible Party may be directed or referred to that Responsible Party for consideration and response.

18. Fees

PAIA permits prescribed fees to be charged in relation to requests for access to records.

Applicable fees are determined by the Regulations made under PAIA and may include:

- a request fee;
- reproduction or copying charges;
- search and preparation fees;
- media costs;
- postage or delivery costs; and
- deposits where a request requires extensive search and preparation.

The Information Regulator publishes the applicable fee structure for private bodies.

Axario will notify a requester of any applicable fees before access is provided where required.

19. Grounds for Refusal of Access

Access to a record may be refused where PAIA permits or requires refusal.

This may include circumstances involving:

- protection of the privacy of a third party;
- confidential commercial information;
- confidential information supplied by a third party;
- safety of individuals or property;
- legally privileged information;
- research information;
- intellectual property;
- confidential business methods or trade secrets;
- security-related information;

- records that cannot lawfully be disclosed; or
- other grounds of refusal recognised under PAIA.

Each request will be considered on its own facts and in accordance with PAIA.

20. Decision on a Request

Axario will consider a properly submitted request and notify the requester of the outcome in accordance with PAIA.

The response may:

- grant access;
- grant partial access;
- refuse access; or
- request further information or payment of prescribed fees.

Where access is refused, the requester will be informed of the decision and available remedies as required by PAIA.

21. Remedies Available to a Requester

As Axario is a private body, there is no internal appeal process equivalent to that applicable to certain public bodies.

A requester who is dissatisfied with a PAIA decision may, subject to PAIA:

- lodge a complaint with the Information Regulator; or
- approach a competent court for appropriate relief.

The Regulator provides complaint procedures and prescribed forms through its PAIA resources.

22. Information Regulator

Current contact information for the Information Regulator is available from its official website.

- Website: <https://www.inforegulator.org.za>
- Email: PAIAComplaints@inforegulator.org.za
- General enquiries: enquiries@inforegulator.org.za

The Regulator's website provides:

- the PAIA Guide;
- PAIA forms;
- PAIA Manual templates;
- complaint procedures;
- PAIA eServices; and
- general guidance.

23. Availability of this Manual

This Manual will be made available:

- on the Axario website;
- at Axario's registered office during normal business hours;
- to any person upon request, subject to any prescribed fee for copies; and
- to the Information Regulator upon request.

24. Language Availability

This PAIA Manual is currently available in English.

Axario will make additional language versions of this Manual available as required in accordance with applicable PAIA requirements and guidance issued by the Information Regulator.

The Information Regulator's PAIA Guide is available in multiple official languages.

25. Updating of this Manual

The Information Officer will review this Manual periodically and whenever there is a material change affecting:

- Axario's business activities;
- information-processing practices;
- categories of records;
- service providers;
- system functionality;
- cross-border processing;
- security arrangements; or
- applicable legislation or regulatory guidance.

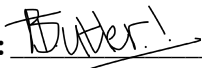
The updated version will be published on the Axario website.

26. Approval

This PAIA Manual is approved and issued on behalf of:

Praxis Marketing Consultancy (Pty) Ltd t/a Axario

Information Officer: Tanya Butler

Signature:  _____

Date: 7 October 2026