



GIGABRAIN SA (RF) (PTY) LTD

trading as Gigabrain SA

PAIA MANUAL

Sovereign, Decentralised GPU Infrastructure in Africa

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

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1. LIST OF ACRONYMS AND ABBREVIATIONS

1.1	“CEO”	Chief Executive Officer
1.2	“CFO”	Chief Financial Officer
1.3	“IO”	Information Officer
1.4	“Minister”	Minister of Justice and Correctional Services
1.5	“PAIA”	Promotion of Access to Information Act No. 2 of 2000 (as amended)
1.6	“POPIA”	Protection of Personal Information Act No. 4 of 2013
1.7	“Regulator”	Information Regulator
1.8	“Republic”	Republic of South Africa
1.9	“Gigabrain” / “the Company”	Gigabrain SA (RF) (Pty) Ltd, trading as Gigabrain SA

2. PURPOSE OF PAIA MANUAL

This PAIA Manual is useful for the public to

- 2.1 check the categories of records held by a body which are available without a person having to submit a formal PAIA request;
- 2.2 have a sufficient understanding of how to make a request for access to a record of the body, by providing a description of the subjects on which the body holds records and the categories of records held on each subject;
- 2.3 know the description of the records of the body which are available in accordance with any other legislation;
- 2.4 access all the relevant contact details of the Information Officer and Deputy Information Officer who will assist the public with the records they intend to access;
- 2.5 know the description of the guide on how to use PAIA, as updated by the Regulator and how to obtain access to it;
- 2.6 know if the body will process personal information, the purpose of processing of personal information and the description of the categories of data subjects and of the information or categories of information relating thereto;
- 2.7 know the description of the categories of data subjects and of the information or categories of information relating thereto;
- 2.8 know the recipients or categories of recipients to whom the personal information may be supplied;
- 2.9 know if the body has planned to transfer or process personal information outside the Republic of South Africa and the recipients or categories of recipients to whom the personal information may be supplied; and

2.10 know whether the body has appropriate security measures to ensure the confidentiality, integrity and availability of the personal information which is to be processed.

3. KEY CONTACT DETAILS FOR ACCESS TO INFORMATION OF GIGABRAIN SA (RF) (PTY) LTD

3.1 Information Officer / Chief Executive Officer

Name:	Noah Kirby
Title:	Chief Executive Officer and Information Officer
Tel:	087 822 1092
Email:	privacy@gigabrain.africa

3.2 Deputy Information Officer

No Deputy Information Officer has been designated in terms of section 17(1) of PAIA and section 56 of POPIA as at the date of this manual. Gigabrain is reviewing the appointment of one or more Deputy Information Officers; this section will be updated once a designation is made.

3.3 Access to Information General Contacts

Email:	privacy@gigabrain.africa
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3.4 National / Head Office

Postal Address:	179 Buitengracht Street, Gardens, Cape Town, 8001
Physical Address:	179 Buitengracht Street, Gardens, Cape Town, 8001
Telephone:	087 822 1092
Email:	privacy@gigabrain.africa
Website:	https://gigabrain.africa/
Registration Number:	2024/659657/07
VAT Registration Number:	4900321177

4. GUIDE ON HOW TO USE PAIA AND HOW TO OBTAIN ACCESS TO THE GUIDE

4.1 The Regulator has, in terms of section 10(1) of PAIA, as amended, updated and made available the revised Guide on how to use PAIA (“Guide”), in an easily comprehensible form and manner, as may reasonably be required by a person who wishes to exercise any right contemplated in PAIA and POPIA.

4.2 The Guide is available in each of the official languages.

4.3 The aforesaid Guide contains the description of—

4.3.1 the objects of PAIA and POPIA;

4.3.2 the postal and street address, phone and fax number and, if available, electronic mail address of every Deputy Information Officer of every public and private body designated in terms of section 17(1) of PAIA and section 56 of POPIA;

4.3.3 the manner and form of a request for access to a record of a private body contemplated in section 50;

4.3.4 the assistance available from the Information Officer of a public body in terms of PAIA and POPIA;

4.3.5 the assistance available from the Regulator in terms of PAIA and POPIA;

4.3.6 all remedies in law available regarding an act or failure to act in respect of a right or duty conferred or imposed by PAIA and POPIA, including the manner of lodging an internal appeal, a complaint to the Regulator, and an application with a court against a decision by the head of a private body;

4.3.7 the provisions of sections 14 and 51 requiring a public body and private body, respectively, to compile a manual, and how to obtain access to a manual;

4.3.8 the provisions of sections 15 and 52 providing for the voluntary disclosure of categories of records by a public body and private body, respectively;

4.3.9 the notices issued in terms of sections 22 and 54 regarding fees to be paid in relation to requests for access; and

4.3.10 the regulations made in terms of section 92.

4.4 Members of the public can inspect or make copies of the Guide from the offices of the public and private bodies, including the office of the Regulator, during normal working hours.

4.5 The Guide can also be obtained—

4.5.1 upon request to the Information Officer;

4.5.2 from the website of the Regulator (<https://www.justice.gov.za/inforeg/>).

5. CATEGORIES OF RECORDS OF GIGABRAIN SA WHICH ARE AVAILABLE WITHOUT A PERSON HAVING TO REQUEST ACCESS

Category of records	Types of the Record	Available on Website	Available upon request
PAIA Manual	This manual	X	
Privacy / POPIA policy	Privacy Policy	X	

6. DESCRIPTION OF THE SUBJECTS ON WHICH GIGABRAIN SA HOLDS RECORDS AND CATEGORIES OF RECORDS HELD ON EACH SUBJECT

Subjects on which the body holds records	Categories of records
Strategic Documents, Plans, Proposals	Business plan, investor presentations, board resolutions and minutes
Finance	Financial statements, tax records, VAT records, banking records
Human Resources	HR policies and procedures, advertised posts, employee records
Compliance	Client onboarding and verification records, vendor due diligence records
IT & Infrastructure	Infrastructure and network documentation, information security policies and records, incident records
Sales / Business Development	Client contracts and service agreements, proposals, pricing records
Legal / Corporate	Memorandum of Incorporation, statutory registers, contracts and agreements

7. PROCESSING OF PERSONAL INFORMATION

7.1 Purpose of Processing Personal Information

Gigabrain processes personal information to provide GPU compute infrastructure-as-a-service to its clients, to onboard and verify clients and vendors (including KYC/AML and UBO verification), to manage vendor and employee relationships, and to comply with applicable legal, tax, and regulatory obligations. Gigabrain does not access, monitor, or process the content or workloads that clients run on the infrastructure it provides.

7.2 Description of the Categories of Data Subjects and of the Information or Categories of Information Relating Thereto

Categories of Data Subjects	Personal Information that may be processed
Customers / Clients	Names, contact details, entity registration numbers, identity numbers, ultimate beneficial ownership (UBO) details, employment status, and banking details collected for KYC/AML purposes
Service Providers / Vendors	Names, registration numbers, VAT numbers, addresses, banking details, and where relevant, trade secrets or confidential business information
Employees	Names, addresses, identity numbers, qualifications, and other information required for employment administration

7.3 Recipients or Categories of Recipients to Whom Personal Information May Be Supplied

Category of Personal Information	Recipients or Categories of Recipients
KYC / client verification information	Regulators and law enforcement where legally required (e.g. Financial Intelligence Centre)
Identity and business documentation	Professional advisors and auditors, including the Company's ISO 27001 certification body/auditor
Employee and contact information	Google Workspace (used as identity provider and for document/communication storage)
Payment-related information	Peach Payments, the Company's third-party payment processor. Gigabrain does not access or store cardholder data directly
Financial and statutory records	Banks, SARS, and other regulators as required by law

7.4 Planned Transborder Flows of Personal Information

Gigabrain uses Google Workspace for identity management, email, and document/data storage (e.g. Google Docs and Sheets). Where personal information is captured or stored within Google Workspace, it may be stored in Europe.

7.5 General Description of Information Security Measures to Ensure the Confidentiality, Integrity and Availability of the Information

Gigabrain is implementing information security measures aligned with internationally recognised standards, including the ISO/IEC 27001 framework, as part of an active certification programme. These measures include, among others, data encryption, access control and multi-factor authentication, vendor and third-party risk management, and incident

response procedures. Gigabrain will continue to strengthen and update these measures as its information security management system matures.

8. AVAILABILITY OF THE MANUAL

8.1 A copy of the Manual is available—

8.1.1 on <https://gigabrain.africa/>

8.1.2 to any person upon request and upon the payment of a reasonable prescribed fee; and

8.1.3 to the Information Regulator upon request.

8.2 A fee for a copy of the Manual, as contemplated in Annexure B of the Regulations, shall be payable per each A4-size photocopy made, currently R1.50 - R2.00 per A4 page (in line with the fees prescribed under the PAIA Regulation).

9. UPDATING OF THE MANUAL

The head of Gigabrain SA (RF) (Pty) Ltd will on a regular basis update this manual.

Issued by

Noah Kirby

2026-09-14

Noah Kirby

Chief Executive Officer and Information Officer, Gigabrain SA (RF) (Pty) Ltd

Audit trail

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• Noah Kirby (noah@gigabrain.africa)

2026/09/11
11:45:18 UTC



SIGNED

Signed by Noah Kirby (noah@gigabrain.africa)

2026/09/14
15:17:49 UTC



COMPLETED

This document has been signed by all signers and is **complete**

2026/09/14
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