AxaraOS PAIA manual

Glory Mulopo trading as AxaraOS.com

Prepared under section 51 of the Promotion of Access to Information Act 2 of 2000, as amended.

Version 1 adopted 13 November 2026
Compiled 12 November 2026

1 Purpose and business scope

This manual explains how to request records held by Glory Mulopo in the capacity of sole proprietor trading as AxaraOS.com. It also describes the main records, processing purposes, service providers and security measures relevant to AxaraOS. PAIA means the Promotion of Access to Information Act; POPIA means the Protection of Personal Information Act 4 of 2013.

The approved launch scope is business marketing content only. Customer contact lists, special or sensitive personal information and children's information are excluded from customer inputs. This restriction does not remove the need to process limited account, security, support and lawful business-administration information. It does not mean all business information is non-personal.

This manual covers AxaraOS records. Records actually held will be assessed when a request is received, including any necessary separation of information belonging to different businesses or people.

2 Head of the private body and contact details

Item	Details
Legal person and trading name	Glory Mulopo, sole proprietor trading as AxaraOS.com Full legal name confirmed by the proprietor on 12 November 2026
Head and Information Officer	Glory Mulopo, proprietor Registration confirmed on the Regulator portal: 12 November 2026
Email and website	mulopo.glory@gmail.com https://axaraos.com
Physical business address	909 Moss Road, Weltevreden Park, Roodepoort, Johannesburg, Gauteng, 1709
Postal address and telephone	Postal address: same as physical address Telephone: 084 023 5917
Deputy Information Officer	No Deputy Information Officer appointed

3 Guide and requests for access

The Information Regulator publishes a guide explaining PAIA, assistance, forms and remedies. The guide and available language versions can be obtained from https://inforegulator.org.za/paia/. A requester may also ask the Information Officer for help locating the guide or identifying the appropriate request process.

The Regulator can be contacted at enquiries@inforegulator.org.za or 010 023 5200. Its current eServices portal lists Woodmead North Office Park, 54 Maxwell Drive, Woodmead, Johannesburg, and postal address PO Box 31533, Braamfontein, Johannesburg, 2017. Check the Regulator's current contact page before physical delivery.

Making a request

1. Use the current prescribed Form 2 for access to a record, available from the Regulator's PAIA resources page. Send it to the Information Officer at the email or business address in section 2.

2. Describe the existing records clearly enough for them to be found. State the right you seek to exercise or protect and explain why the requested records are required for that purpose, as applicable to a private-body request.

3. Provide a delivery address or email, the preferred form of access and, if acting for another person, evidence of authority. Ask for reasonable assistance if you cannot complete the form.

4. We will use proportionate identity and authority checks before disclosing protected records. Do not send identity documents to an unverified address. We will explain any necessary secure verification process.

5. Any applicable fee, deposit, decision or reason for refusal will be communicated in writing. A request does not automatically make another customer's information, confidential material or privileged records accessible.

Timeframes and remedies

A decision is ordinarily due within 30 days after receipt of a compliant request. An extension of no more than a further 30 days may be used only on grounds allowed by PAIA, with the required notice. Silence after the applicable period may be treated as refusal. Statutory rules take precedence over an application dashboard target.

AxaraOS is a private body and has no statutory PAIA internal-appeal procedure. A requester may use the Regulator's Form 5 complaint process or seek appropriate court relief. The Regulator's published guidance generally allows a private-body complaint within 180 days of the relevant refusal or failure to respond. Consult the current guide for the precise route and deadlines.

4 Records available without a formal request

Record category	How to obtain it
Public service and product information	Published pages at https://axaraos.com
Public legal and support pages	Published Terms, Privacy, Refunds, Subscriptions and Support pages
Approved PAIA manual	Website and inspection/request arrangements in section 10, following adoption
Your own account privacy snapshot	Authenticated Privacy Centre, where available. This is a limited product snapshot and does not replace a reviewed statutory request.

5 Other records held or potentially held

The categories below describe records relevant to the business. A category does not establish that every listed item exists, nor that it must be disclosed. Public access, customer self-service access and a formal PAIA request are different processes.

Subject	Records where held
Business governance	This manual, registration evidence, processing records, provider assessments, policies and business correspondence
Account and workspace administration	Account identifiers, business contact details, membership, roles, trial and onboarding records
Customer marketing work	Business briefs, brand information, permitted website evidence, prompts, generated drafts and creative assets
Security and operations	Access controls, security and incident evidence, audit decisions, usage records, backup inventories and restore evidence
Support and privacy	Support correspondence, rights requests, verification outcomes and request decisions
Finance and suppliers	Supplier agreements, business expenditure, invoices and accounting/tax records where held; test billing metadata and any later lawful payment records
Email operations	Authorised transactional or operational communications and minimum delivery, consent or suppression evidence; no customer contact-list service at launch

6 Records under other legislation

Relevant records may be retained or accessible under POPIA, PAIA, the Electronic Communications and Transactions Act 25 of 2002, the Consumer Protection Act 68 of 2008 where applicable, and applicable provisions of the Income Tax Act 58 of 1962 and Tax Administration Act 28 of 2011. VAT and employment legislation apply only if the relevant circumstances arise. No VAT registration, employment relationship or company registration is asserted by this list.

7 Processing of personal information

AxaraOS processes limited personal information to provide requested accounts and workspace services, protect access, respond to enquiries and rights requests, maintain necessary business records and recover services. The restricted marketing-content scope is not permission to upload excluded data. If excluded information is received accidentally, it must be contained and reviewed rather than used for a new purpose.

People or bodies	Information and purposes
Account holders and workspace users	Names, business emails, organisation and account identifiers, roles, authentication/security records and usage needed for access and requested services
People who contact the business	Contact details and correspondence needed to respond to enquiries, support or rights requests
Suppliers and professional advisers	Business contacts, agreements, invoices and payment/accounting details where necessary for the relationship
Customers supplying business content	Business briefs, brand and website material and generated work. The customer must have authority to provide the content. Contact lists, sensitive and children's data are excluded.

Recipients and service providers

Recipient category	Relevant purpose
Supabase	Database, authentication and private asset storage
Vercel	Application hosting, server processing and operational metadata
OpenAI	Requested AI analysis and creative processing of permitted inputs
Resend	Authentication, approved operational emails and related delivery metadata
Google Drive	Owner-controlled encrypted backup archive; recovery passphrase held separately
Payment providers	Paystack test processing while live collection is closed; any legacy Paddle records only where they actually exist and must be reconciled
Authorised advisers and authorities	Only where needed for the relevant service, valid legal duty, request, dispute or lawful disclosure

The proprietor controls authorised access. A provider's technical configuration does not by itself settle its legal role, contract or transfer safeguards. Account, operational and customer-content purposes must be assessed separately. No customer is automatically enrolled in marketing by accepting account terms.

8 Transfers and information security

Processing outside South Africa occurs or is planned through cloud services. Supabase project settings confirm that the core project is hosted in Ireland, eu-west-1. Vercel, OpenAI, Resend and Google services may involve processing or support in other countries. Their full applicable locations and arrangements require provider-specific review; an Ireland database does not keep all application processing in Ireland.

Before broader customer access, the proprietor will document the relevant recipients, purposes and basis for international transfers under section 72 of POPIA and the applicable contracts. This manual, vendor configuration and a general reference to international clauses do not by themselves establish that every transfer condition has been met.

Measures used for current restricted testing

- Authenticated workspace access, role restrictions and tenant isolation; server-side privilege checks and tested session, suspension and MFA controls.

- Private asset storage and controlled credentials kept outside source code. API secrets are not made available to public clients.

- Human approval before consequential publishing and controlled operational/audit records. The guardrail ledger records hashes and bounded metadata rather than raw prompt bodies.

- Guarded AI entry runs request no Responses application-state storage and disable optional SDK trace export. This is not a Zero Data Retention arrangement or a provider abuse-monitoring exemption.

- Tested manual database recovery and a separately encrypted offsite backup, with the recovery passphrase retained separately by the proprietor.

These are bounded operational controls, not an assurance that all attacks are prevented or that every statutory obligation is complete. Access and incident response remain the proprietor's responsibility.

9 Retention and personal information rights

Records must not be kept longer than justified by their purpose, applicable law, an enforceable obligation or a valid dispute/investigation hold. The current application has review thresholds of 30 days for agent conversations, 90 days for agent runs and 365 days for audit and privacy events. These are review triggers, not automatic deletion rules or statutory retention periods.

The full schedule must also address account, asset, financial, support, suppression, provider-log and backup records. A reviewed erasure must consider protected evidence and how restored backups will avoid reintroducing erased data. The application does not automatically erase production datasets.

A person may ask for access to personal information, correction or deletion where applicable, or object to processing through the Information Officer. Marketing permission can be withdrawn separately. Requests are assessed under the relevant law, including any lawful reason to retain a record. A Privacy Centre request is not evidence that deletion has already occurred.

10 Fees and availability

Applicable private-body PAIA fees are determined under the regulations, subject to relevant exclusions and exemptions. The Information Officer will give a fee/outcome notice using the current prescribed Form 3 where appropriate. POPIA personal-information access and correction rights must not be incorrectly treated as ordinary paid third-party PAIA requests.

Common private-body fee item	Published amount checked on 12 November 2026
Request fee where applicable	R140
A4 photocopy or printed page	R2 per page or part
Search and preparation	R145 per hour or part, excluding the first hour; maximum R435
Extended search deposit	Where the prescribed conditions are met, a deposit may be required

Other reproduction and delivery fees may apply. Use the current complete schedule at https://inforegulator.org.za/paia-fees-structure-2/ rather than treating this short table as an exhaustive tariff. Any applicable legal exemption takes precedence.

The adopted manual is made available on the AxaraOS website, at the principal business address in section 2 for inspection during normal business hours, to a person on request subject to any lawful reproduction charge, and to the Information Regulator on request. Adopted on 13 November 2026; a copy is provided to the Information Regulator on request.

11 Review and adoption

The proprietor will review the manual when business details, service providers, records or processing purposes change, and regularly thereafter. The Information Officer contact particulars must remain consistent with the Regulator registration. The restricted launch policy must be implemented in the service before public access is enabled; this manual alone does not disable contact-list features or prevent prohibited inputs.

Approval item	Completion
Full legal name and business contact details	Glory Mulopo and business contact details confirmed by the proprietor
Information Officer registration	Confirmed: 12 November 2026. Retain certificate privately.
Issued by	Glory Mulopo, proprietor trading as AxaraOS.com
Adoption record	Adopted by Glory Mulopo on 13 November 2026 through express owner approval

Official resources

Information Regulator PAIA guide, forms and language versions: https://inforegulator.org.za/paia/

Private-body manual template: https://www.inforegulator.org.za/wp-content/uploads/2020/07/PAIA-Manual-Template-Private-Body.pdf

Information Officer registration and current contact details: https://eservices.inforegulator.org.za/

POPIA guidance and forms: https://inforegulator.org.za/popia/