

PAIA MANUAL Promotion of Access to Information Act 2 of 2000 As amended by the Protection of Personal Information Act 4 of 2013

AETHERBLOOM GROUP PLY LTD

POPIA Registration Number: 2025-066638

Information Officer: Della Carnegie

Appointment Date: 4 August 2025

Email: dpo@aetherbloom.co.uk

UK Address: 71-75 Shelton Street, Covent Garden, London, WC2H 9JQ

SA Address: 22 Century Boulevard, Johannesburg, South Africa

Website: www.aetherbloom.co.uk

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FOREWORD BY THE INFORMATION OFFICER

Aetherbloom Group is committed to transparency, accountability, and the protection of personal information. This manual is published in compliance with Section 51 of the Promotion of Access to Information Act 2 of 2000 (PAIA) and reflects our commitment to upholding the rights of data subjects across both our United Kingdom and South African operations.

This manual explains who we are, what records we hold, how individuals can request access to those records, and how we handle such requests. It should be read alongside our Privacy & Legal Policy available at www.aetherbloom.co.uk/privacy-legal.

Della Carnegie Information Officer Aetherbloom Group PLY LTD

PART A - INFORMATION ABOUT AETHERBLOOM GROUP

A1. Description of the Organisation

Aetherbloom Group is a business process outsourcing and digital support social enterprise operating across the United Kingdom and South Africa. We connect UK businesses with professionally trained remote teams based in South Africa, delivering customer support, back-office operations, and specialist business services to UK compliance standards.

Aetherbloom operates as both a commercial enterprise and a social enterprise, with a portion of revenue and operational activity directed toward supporting vulnerable communities and creating meaningful employment opportunities in South Africa.

A2. Legal Entities

Aetherbloom Ltd - Registered in England and Wales. Company No. 16355910. Registered office: 71-75 Shelton Street, Covent Garden, London, WC2H 9JQ.

Aetherbloom Group PLY LTD - South African operational entity. POPIA Registration No. 2025-066638. Operating address: 22 Century Boulevard, Johannesburg, South Africa.

A3. Contact Details of Information Officer

Full Name: Della Carnegie Title: Information Officer and Co-Founder

Email: dpo@aetherbloom.co.uk

Postal Address: 22 Century Boulevard, Johannesburg, South Africa

All requests for access to information, objections to processing, and data subject requests must be directed to the Information Officer at the contact details above.

PART B - GUIDE ON HOW TO USE THIS MANUAL

B1. Purpose of This Manual

This manual serves to:

- Inform data subjects of their rights under PAIA and POPIA
- Explain what categories of records Aetherbloom holds
- Describe the process for requesting access to records
- Set out the grounds on which access may be refused
- Provide information about remedies available where requests are refused

B2. Availability of This Manual

This manual is available:

- On the Aetherbloom website at www.aetherbloom.co.uk/privacy-legal
- In printed form upon request from the Information Officer
- At the South African Human Rights Commission (www.sahrc.org.za)

B3. Reference to the South African Human Rights Commission Guide

The South African Human Rights Commission (SAHRC) has compiled a guide to assist persons wishing to exercise their rights under PAIA. This guide is available from the SAHRC at:

South African Human Rights Commission PAIA Unit Private Bag 2700 Houghton 2041
Telephone: 011 877 3600 Website: www.sahrc.org.za

PART C - RECORDS HELD BY AETHERBLOOM GROUP

Aetherbloom Group holds the following categories of records:

C1. Client Records

- Client company details and contact information
- Service agreements, statements of work, and Data Processing Agreements
- Communications between Aetherbloom and clients

- Performance reports and dashboards
- Invoice and payment records
- Assessment and onboarding documentation

C2. Client Customer Records Personal data processed on behalf of clients in the delivery of agreed services, including:

- Customer names and contact details
- Order and account information
- Customer correspondence and query records
- CRM data as shared or generated during service delivery

Note: Aetherbloom processes client customer data as a data processor acting on the instructions of the client as data controller. Requests relating to this data should in the first instance be directed to the relevant client organisation.

C3. Employee and Contractor Records

- Employment contracts and offer letters
- Personal identification documents
- Payroll and banking information
- Performance records and appraisals
- Training records and certifications
- Leave records
- Disciplinary records where applicable
- Emergency contact information

C4. Job Applicant Records

- CVs and application documents
- Interview notes and assessment records
- Reference check information
- Correspondence with applicants

Unsuccessful applicant records are retained for a maximum of 12 months from the date of the decision unless the applicant consents to longer retention for future opportunities.

C5. Partner and Supplier Records

- Contact details of partner organisations and their representatives
- Partnership and collaboration agreements
- Supplier contracts and service agreements
- Correspondence with partners and suppliers

Current and former SA partner organisations include but are not limited to: Bethany Homes, Hope Foundation SA, YES South Africa, Harambee, Classroom Buddies, and Champions for Change.

C6. Financial Records

- Company financial statements
- Bank account records
- Invoice and expense records
- Payroll records
- Tax and regulatory filings

C7. Website and Marketing Records

- Website visitor analytics data
- Newsletter subscriber lists and consent records
- Marketing campaign records
- Social media account data
- Downloadable resource access records

C8. Compliance and Governance Records

- POPIA compliance framework documentation
- Data Processing Agreements
- Breach response records
- Data subject request logs
- Staff training and awareness records
- PAIA manual and review history

PART D — RECORDS AVAILABLE WITHOUT FORMAL REQUEST

The following information is freely available on the Aetherbloom website without the need for a formal PAIA request:

- Privacy & Legal Policy (including Privacy Policy, Cookie Policy, and GDPR/POPIA Compliance Statement)
- Terms of Service
- PAIA Manual
- Form 1 — Objection to Processing
- Form 2 — Request for Correction or Deletion
- Form 4 — Consent to Direct Marketing
- General company information and service descriptions

These documents are available at www.aetherbloom.co.uk/privacy-legal

PART E - PROCESS FOR REQUESTING ACCESS TO RECORDS

E1. Who May Request Access

Any person, including a juristic person such as a company, may request access to records held by Aetherbloom Group in terms of PAIA. Requests may be made by the data subject themselves or by an authorised representative acting on their behalf.

E2. How to Submit a Request

All requests for access to records must be submitted in writing to the Information Officer using the prescribed form (Form C as prescribed by the SAHRC) or a form substantially similar to it. Requests should include:

- Full name and contact details of the requester
- Description of the record or records requested
- The form in which access is preferred (e.g. copy, inspection)
- Proof of identity
- If requesting on behalf of another person, written authorisation from that person

Requests should be submitted to:

Email: dpo@aetherbloom.co.uk Subject line: PAIA ACCESS REQUEST Post: Aetherbloom Group PLY LTD, 22 Century Boulevard, Johannesburg, South Africa

E3. Response Timeframes

Aetherbloom will acknowledge receipt of a PAIA request within 3 business days.

Aetherbloom will respond to the request within 30 days of receipt, unless an extension is required in terms of PAIA. Where an extension is required, the requester will be notified in writing within the initial 30-day period with the reasons for the extension and the anticipated response date.

E4. Fees

In terms of PAIA, a request fee and access fee may be applicable. Aetherbloom reserves the right to charge fees as prescribed by PAIA regulations. Where fees are applicable, the requester will be notified before any fee is charged and access will not be granted until the fee is paid.

Requesters who can demonstrate that they are unable to pay the prescribed fee may apply for exemption by submitting a written application to the Information Officer explaining their financial circumstances.

E5. Form of Access

Where a request is granted, the requester may indicate their preferred form of access:

- Inspection of the record
- Copy of the record
- Copy of the record in electronic format where available
- Transcription of the record where applicable

Aetherbloom will provide access in the preferred form unless doing so is not reasonably practicable, in which case access will be provided in a form that is reasonable in the circumstances.

PART F - GROUNDS FOR REFUSAL OF ACCESS

Aetherbloom may refuse a request for access to records on the following grounds as provided for in PAIA:

F1. Mandatory Grounds for Refusal

- The record contains personal information about a third party who has not consented to disclosure, unless the public interest in disclosure clearly outweighs the privacy interest
- Disclosure would reveal confidential commercial information that could harm a third party's competitive position
- Disclosure would constitute a breach of a duty of confidence owed to a third party
- Disclosure is prohibited by law or would be contempt of court

F2. Discretionary Grounds for Refusal

- The record contains commercially sensitive information about Aetherbloom's operations
- The record is subject to legal professional privilege
- The record contains information that could endanger the safety of any individual
- The request is clearly frivolous or vexatious

Where access is refused, Aetherbloom will notify the requester in writing of the refusal and the grounds for refusal within the required timeframe.

PART G - REMEDIES AVAILABLE WHERE ACCESS IS REFUSED

Where a requester is not satisfied with Aetherbloom's decision regarding their request, the following remedies are available:

G1. Internal Appeal The requester may submit a written appeal to the Information Officer within 30 days of receiving the refusal, setting out the grounds on which they believe the refusal was incorrect. Aetherbloom will respond to the appeal within 30 days.

G2. Application to Court In terms of Section 82 of PAIA, a requester may apply to a court for relief if they are not satisfied with the outcome of their request or appeal.

G3. Complaint to the Information Regulator A requester may lodge a complaint with the Information Regulator of South Africa if they believe their rights under POPIA have been infringed:

The Information Regulator (South Africa) JD House, 27 Stiemens Street Braamfontein, Johannesburg, 2001 Email: inforeg@justice.gov.za Website: www.justice.gov.za/inforeg

G4. Complaint to the ICO (UK) For matters relating to UK data protection, complaints may be lodged with the Information Commissioner's Office:

PART H - CATEGORIES OF RECORDS THAT MAY NOT BE DISCLOSED

The following categories of records will not be disclosed under any circumstances:

- Individual employee banking details and identity documents
- Client commercially sensitive information shared in confidence
- Legal advice received by Aetherbloom
- Records subject to ongoing legal proceedings
- Security systems and access control information
- Passwords and authentication credentials

PART I - PROCESSING OF PERSONAL INFORMATION

For full details of how Aetherbloom Group processes personal information, including the purposes of processing, lawful bases, retention periods, data subject rights, and international transfer safeguards, please refer to our Privacy & Legal Policy at www.aetherbloom.co.uk/privacy-legal.

For information specific to the processing of employee personal information, please refer to your employment contract and the Aetherbloom Internal Data Handling Policy, available from the Information Officer.

PART J - REVIEW AND UPDATES

This manual will be reviewed annually by the Information Officer or whenever a significant change occurs in Aetherbloom's processing activities, legal obligations, or organisational structure. The current version will always be available on the Aetherbloom website.

Version history:

Version	Date	Summary of Changes
1.0	May 2026	Initial publication