

PAIA Manual

Aiming Global (Pty) Ltd t/a AI Moments

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

Registered with the Information Regulator of South Africa, Reg. No. 2026-068116
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Part 1: Introduction and Legal Framework

The Promotion of Access to Information Act 2 of 2000 (PAIA) gives effect to the constitutional right of access to information held by private bodies where that information is required to exercise or protect a right. Every private body is required to compile and make available a manual setting out how requests for access to information may be made.

This manual is compiled by Aiming Global (Pty) Ltd, trading as AI Moments, in compliance with section 51 of PAIA and the Protection of Personal Information Act 4 of 2013 (POPIA). It should be read together with Aiming Global's Privacy Policy, available at ai-moments.africa.

The South African Human Rights Commission (SAHRC) has published a guide to assist persons wishing to exercise their rights under PAIA. This guide is available from the SAHRC at www.sahrc.org.za or by calling 011 877 3600.

Part 2: Organisation Details and Information Officer

Responsible Party

Field	Details
Registered name	Aiming Global (Pty) Ltd
Trading name	AI Moments
Company registration number	2023/962656/07
Information Regulator registration number	2026-068116
Registered address	24 John Street, Buccleuch, Sandton, Gauteng, 2090

Field	Details
Website	ai-moments.africa

Information Officer

Field	Details
Full name	Geert Ida Gilbert De Sutter
Designation	Director
Email address	paia-request@ai-moments.africa
Telephone	0606559575
Postal address	24 John Street, Buccleuch, Sandton, Gauteng, 2090

All requests for access to information, complaints, and data subject rights requests should be directed to the Information Officer at the contact details above.

Part 3: Records Held and Personal Information Processed

Aiming Global holds records in connection with the operation of Proof of You (PoY™), its flagship AI-assisted capability tool, and the broader AI Moments platform.

3.1 Categories of personal information processed

Category	Purpose	Retention
CV content (submitted voluntarily by the user)	To enable the PoY tool to identify and surface the user's undersold strengths	Duration of the session; not stored beyond the session unless explicitly consented
Conversational responses generated during the PoY session	To produce the user's proof cards in their own words	Duration of the session; not stored beyond the session unless explicitly consented
Name and contact details (where voluntarily provided)	To facilitate follow-up, testimonial consent, or institutional pilot administration	Retained only with explicit consent; deleted on request

Category	Purpose	Retention
Testimonials and quotes (where explicitly consented)	To evidence product outcomes on the AI Moments platform and in outreach materials	Retained only where written consent has been obtained; removed on withdrawal of consent
Institutional pilot data (aggregate, anonymised)	To report on programme outcomes to institutional partners	Anonymised; no personally identifiable information retained in aggregate reports

3.2 Data processing principles

Aiming Global processes personal information in accordance with POPIA's eight conditions for lawful processing:

1. **Accountability** — Aiming Global takes responsibility for all personal information under its control.
2. **Processing limitation** — Personal information is collected only for a specific, defined purpose.
3. **Purpose specification** — The purpose for which information is collected is stated at the point of collection.
4. **Further processing limitation** — Information is not processed in a manner incompatible with the original purpose.
5. **Information quality** — Reasonable steps are taken to ensure information is accurate and up to date.
6. **Openness** — Users are informed of what information is collected and how it is used.
7. **Security safeguards** — Technical and organisational measures are in place to prevent unauthorised access, loss, or disclosure.
8. **Data subject participation** — Users may request access to, correction of, or deletion of their personal information at any time.

3.3 Data hosting and infrastructure

Aiming Global's platform operates across the following third-party infrastructure, all hosted in the United States:

Service	Provider	Personal data processed	Stored?
Frontend application	Lovable (lovable.dev)	None	No
CV intake and conversation engine	Railway (railway.app)	CV text and conversational responses	No — ephemeral per session only
AI processing	Anthropic Messages API	CV text and conversational responses	No — processed in-flight, not retained
Session state	User's browser (localStorage)	Conversation history between turns	No — discarded when session ends
Platform database	Supabase (managed by Lovable)	See table below	Yes — see below
Feedback and session logs	Google Sheets (Google LLC)	Feedback ratings, proof card text, email address (where voluntarily submitted)	Yes
Transactional email	Email delivery via n8n on Railway	Email address (used once for card delivery)	Logged in send log only

Important: No CV content, proof card text, or candidate session data is stored in the platform database. Proof of You sessions are ephemeral by design — all session data lives in the user's browser only and is discarded when the session ends.

Personal information stored in the platform database (Supabase):

Category	Purpose	Personal data fields
Institutional enquiries	Responding to B2B enquiries from organisations	Name, email, company, job title
Email leads and marketing	Delivering requested resources and confirming opt-ins	Email address, lead source
Email send log	Delivery records for transactional emails	Recipient email address, delivery status

Category	Purpose	Personal data fields
Customer transactions	Fulfilling paid orders and granting tool access	Email address, payment reference, purchase amount
ROI Calculator submissions	Generating custom business case calculations	Name, email, company, job role, salary band

Aiming Global takes reasonable steps to ensure that all third-party processors operate under terms consistent with POPIA requirements. A full data flow disclosure is available on request from the Information Officer.

Part 4: How to Request Access to Information

Any person wishing to request access to records held by Aiming Global must submit a written request to the Information Officer using the prescribed PAIA request form (Form C), available from the SAHRC website at www.sahrc.org.za.

4.1 Request process

1. Complete Form C (PAIA request form).
2. Submit the completed form to the Information Officer by email at paia-request@ai-moments.africa or by post to 24 John Street, Buccleuch, Sandton, Gauteng, 2090.
3. Include proof of identity (copy of ID or passport).
4. Pay the applicable request fee (see below).

4.2 Fees

Fee type	Amount
Request fee (payable on submission)	R50.00
Access fee (payable before records are released)	R1.10 per page (printed copies)
No fee applies	Where the requester is seeking access to their own personal information

Fees are set in accordance with PAIA regulations. No fee is charged where the request relates to the requester's own personal information.

4.3 Timeframes

Aiming Global will respond to a PAIA request within **30 days** of receipt. This period may be extended by a further 30 days in exceptional circumstances, in which case the requester will be notified.

Part 5: Grounds for Refusal

Aiming Global may refuse access to records in the following circumstances (as set out in Chapter 4 of PAIA):

- The record contains personal information about a third party who has not consented to disclosure.
- Disclosure would reveal commercially sensitive or confidential business information.
- The record is protected by legal privilege.
- Disclosure would cause harm to the commercial activities of Aiming Global.
- Disclosure is not in the public interest and the information is not required to exercise or protect a right.

Where access is refused, the requester will be notified in writing with reasons, and informed of their right to appeal or seek judicial review.

Part 6: Data Subject Rights and Complaints

6.1 Rights under POPIA

Users whose personal information is processed by Aiming Global have the following rights:

- **Right of access** — to request confirmation of whether personal information is held, and to receive a copy.
- **Right to correction** — to request correction of inaccurate, incomplete, or outdated information.
- **Right to deletion** — to request deletion of personal information where processing is no longer necessary or lawful.
- **Right to object** — to object to the processing of personal information on reasonable grounds.
- **Right to withdraw consent** — where processing is based on consent, to withdraw that consent at any time without penalty.

All such requests should be submitted to the Information Officer at paia-request@ai-moments.africa. Aiming Global will respond within 30 days.

6.2 How to lodge a complaint

If a data subject believes that Aiming Global has breached their rights under POPIA, they may:

1. First direct the complaint to the Information Officer at paia-request@ai-moments.africa.
2. If not resolved, lodge a complaint with the Information Regulator of South Africa:

Information Regulator (South Africa) Woodmead North Office Park, 54 Maxwell Drive, Woodmead, Johannesburg P.O. Box 31533, Braamfontein, Johannesburg, 2017 Website: www.inforegulator.org.za Email: infoereg@justice.gov.za

Part 7: Contact Details and Document Availability

This PAIA Manual is available:

- On the Aiming Global website at **ai-moments.africa** (linked in the website footer)
- In electronic format on request from the Information Officer at paia-request@ai-moments.africa
- In printed format on request (a reasonable copying fee may apply)

Information Officer contact details:

Geert De Sutter Information Officer — Aiming Global (Pty) Ltd t/a AI Moments Email: paia-request@ai-moments.africa Tel: 0606559575 Address: 24 John Street, Buccleuch, Sandton, Gauteng, 2090

This manual was compiled on 30 September 2026 and will be reviewed annually or when material changes occur to the organisation's operations or applicable legislation.