

# PAIA Manual (Section 51)

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

**Private Body:** JillAI (Pty) Ltd (trading as Jill.AI)

**Website:** [jilldotai.co.za](http://jilldotai.co.za)

**Date of compilation:** @December 20, 2025

**Date of last revision:** @December 20, 2025

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## 1. List of acronyms and abbreviations

"CEO" Chief Executive Officer

"DIO" Deputy Information Officer

"IO" Information Officer

"Minister" Minister of Justice and Correctional Services

"PAIA" Promotion of Access to Information Act No. 2 of 2000 (as amended)

"POPIA" Protection of Personal Information Act No. 4 of 2013

"Regulator" Information Regulator (South Africa)

"Republic" Republic of South Africa

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## 2. Purpose of this PAIA Manual

This PAIA Manual is intended to help requesters:

- identify categories of records held by JillAI that are available without a formal PAIA request;
  - understand how to request access to records held by JillAI;
  - understand which records are available in accordance with other legislation;
  - access contact details for the Information Officer;
  - understand whether JillAI processes personal information, the purpose of such processing, categories of data subjects, categories of personal information, recipients, transborder flows, and security measures.
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## 3. Key contact details for access to information

### 3.1 Information Officer (IO)

**Name:** Estelle Coetzee

**Email:** [estelle.coetzee@jilldotai.co.za](mailto:estelle.coetzee@jilldotai.co.za)

**Telephone:** +27 72 088 9940

**Physical address:** Vaalpark, Freestate, South Africa, 1947

### 3.2 Deputy Information Officer (DIO)

JillAI has not designated a Deputy Information Officer at this time.

### 3.3 Access to information: general

**Email:** [estelle.coetzee@jilldotai.co.za](mailto:estelle.coetzee@jilldotai.co.za)

### 3.4 Head office

**Physical address:** Sasolburg, Freestate, South Africa, 1947

**Telephone:** +27 72 088 9940

**Email:** [estelle.coetzee@jilldotai.co.za](mailto:estelle.coetzee@jilldotai.co.za)

**Website:** [jilldotai.co.za](http://jilldotai.co.za)

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## 4. Guide on how to use PAIA and how to obtain access to the guide

The Regulator has published a PAIA Guide in terms of section 10(1) of PAIA.

The Guide can be obtained:

- upon request to the Information Officer; and
  - from the Regulator's website: <https://www.justice.gov.za/inforeg/>
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## 5. Categories of records available without a PAIA request

Category of records	Types of records	Available on website	Available upon request
Company information	Public website information, product descriptions, public policies	X	X

Privacy documentation	Privacy Policy	X	X
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## 6. Records available in accordance with other legislation

Category of records	Applicable legislation
Memorandum of Incorporation and company records	Companies Act 71 of 2008
PAIA Manual	Promotion of Access to Information Act 2 of 2000
Privacy compliance documentation	Protection of Personal Information Act 4 of 2013 (POPIA)

## 7. Description of subjects on which JiliAI holds records and categories of records

Subject	Categories of records
Corporate governance	Company registration documentation; governance notes; policies
Finance	Accounting records; invoices; banking records; tax-related records
Technology and security	System architecture documents; security controls; audit logs (where applicable)
Privacy and compliance	Privacy Policy; PAIA Manual; consent records (where applicable); processing records
People (if applicable)	Contractor agreements; staff records (if/when employees are hired)

## 8. Processing of personal information (POPIA)

As a baseline principle:

Before verification we process minimal security signals to protect the service. After verification (with guardian consent) we may process additional device signals to prevent fraud and keep children safe. We do not use these signals for advertising.

This section describes, at a high level, personal information JillAI may process when operating its Services, including the IOkT Suite. For more detail, refer to the Privacy Policy.

## 8.1 Purpose of processing personal information

JillAI processes personal information to:

- provide child safety and security features;
- manage Guardian and Child accounts and permissions;
- conduct age/identity verification where required and consented to;
- prevent fraud, abuse, and ban evasion;
- maintain, secure, and improve services; and
- comply with legal obligations.

## 8.2 Categories of data subjects and categories of personal information

Category of data subject	Personal information that may be processed
Guardians (parents/legal guardians)	Contact details (name, email, phone); account identifiers; verification signals for adult/guardian status; security and log data
Children (minors under 18)	Device/app information needed for safety features; safety-related signals and alerts; limited log/diagnostic data
Service providers / partners (where applicable)	Contact details; contractual and billing information; audit/security information needed to manage the relationship

## 8.3 Recipients or categories of recipients

JillAI may share limited personal information with:

- identity/age/adult verification providers (as applicable);
- fraud and risk providers (as applicable);
- cloud infrastructure and hosting providers (as applicable);
- credential/blockchain infrastructure providers (as applicable);

- professional advisers where necessary (e.g., legal/accounting), subject to confidentiality.

## 8.4 Planned transborder flows

Personal information may be processed or stored in South Africa and/or other countries where JillAI's service providers operate. JillAI will implement appropriate safeguards for any cross-border processing.

## 8.5 Security measures

JillAI uses security safeguards appropriate to the sensitivity of the information, which may include encryption, access controls, least privilege, monitoring, and incident response.

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## 9. Availability of this manual

A copy of this Manual is available:

- on JillAI's website: [jilldotai.co.za](http://jilldotai.co.za);
- at JillAI's head office for inspection during normal business hours (by appointment);
- upon request (and upon payment of a reasonable prescribed fee, where applicable); and
- to the Information Regulator upon request.

## 10. Updating of this manual

JillAI will update this Manual on a regular basis and as required by changes in legislation or operations.

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Issued by:

**Estelle Coetzee**

Information Officer, JillAI (Pty) Ltd