



Kagiso Le Tshepiso

(Pty) Ltd

Innovation with Integrity

KAGISO LE TSHEPISO (PTY) LTD

Registration Number: 2026/125041/07 in Accordance with the Companies Act 71 of 2008
(as amended)

PAIA & POPIA MANUAL

Prepared in accordance with Section 51 of the Promotion of Access to Information Act, No. 2 of 2000 ("PAIA") and the Protection of Personal Information Act, No. 4 of 2013 ("POPIA").

Company Name: Kagiso Le Tshepiso (Pty) Ltd (t/a SylX™)

Registration Number: 2026/125041/07

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1. INTRODUCTION

Kagiso Le Tshepiso (Pty) Ltd is a South African private company mandated to design, develop, and deploy digital platforms and solutions, including the flagship skills-to-livelihood ecosystem, SylX. This manual is published to assist requesters in understanding the records held by the company and the procedures to follow when requesting access to such records.

2. COMPANY CONTACT DETAILS (Section 51(1)(a))

- **Head of the Company (CEO):** Ronny Lepalakgwane Mathibela
- **Information Officer:** Ronny Lepalakgwane Mathibela
- **Information Officer Registration Number:** 2026-062975
- **Registered & Postal Address:** 353 Sephaku Village, Groblersdal, Limpopo, 0470, South Africa
- **Email (Compliance & PAIA Requests):** compliance@kagisoletshepiso.com
- **Email (Privacy Matters):** privacy@sylxglobal.com
- **Website:** www.kagisoletshepiso.com

3. THE INFORMATION REGULATOR'S GUIDE (Section 51(1)(b))

The Information Regulator has compiled a Guide, as required by Section 10 of PAIA, containing information to assist anyone who wishes to exercise any right as contemplated in PAIA and POPIA. The Guide is available in all official South African languages. Any inquiries regarding this Guide should be directed to the Information Regulator:

- **Website:** <https://inforegulator.org.za/>
- **Email:** enquiries@inforegulator.org.za

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4. RECORDS AVAILABLE WITHOUT A REQUEST (Section 51(1)(c))

The following records are automatically available to the public on our website (www.kagisoletshepiso.com) as well as the SylX Platform and do not require a formal request:

- Corporate Privacy Policy
- Corporate Terms of Use
- SylX Platform Privacy Policy
- SylX Platform Master Terms of Use (The Livelihood Protocol)
- Community Guidelines and Ethics Policy
- Creator IP & Professional Warranty Policy
- Safe-T-Hold Refund Policy
- Independent Auditor Disclosure
- B-BBEE Certificate (Level 1 Contributor)
- SylX Public Mastery Badges (Anonymized data anchored to the blockchain)
- SylX Syllabus Taxonomy (The list of functional skills)

5. RECORDS KEPT IN ACCORDANCE WITH OTHER LEGISLATION (Section 51(1)(d))

Kagiso Le Tshepiso (Pty) Ltd retains records in compliance with the following (and other applicable) South African legislation:

- Companies Act 71 of 2008
- Electronic Communications and Transactions Act 25 of 2002 (ECT Act)
- Consumer Protection Act 68 of 2008 (CPA)
- Income Tax Act 58 of 1962 & Value Added Tax Act 89 of 1991
- Protection of Personal Information Act 4 of 2013 (POPIA)
- Financial Intelligence Centre Act 38 of 2001 (FICA)

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6. CATEGORIES OF RECORDS HELD (Section 51(1)(e))

The company maintains the following categories of records.

Note: Access to these records is not automatic and is subject to the grounds of refusal set out in PAIA.

A. Corporate & Administrative:

- Incorporation documents (CIPC).
- Director details and resolutions.

B. Financial Records:

- Annual financial statements, tax returns, and accounting records.
- Webhook logs from the Gateway Virtual Hub and Self-Bill Invoices.

C. Platform & Ecosystem Data (SylX):

- **The Impact Ledger:** Immutable records of verified sessions, gigs, and achievements.
- **The Trust Vault:** Encrypted copies of user-uploaded professional licenses.
- **AI Explainability Logs:** Technical records of automated decisions made by the Career Path and Fraud AI.

7. PROCESSING OF PERSONAL INFORMATION (POPIA)

As a Responsible Party, we process Personal Information in accordance with POPIA.

- 7.1. **Purpose of Processing:** To facilitate vocational skill swapping, professional networking, to provide automated career path profiling, and to execute corporate/administrative functions.
- 7.2. **Categories of Data Subjects:** Community Members, Verified Professionals, Investors, Corporate Partners, and internal staff.
- 7.3. **Recipients of Data:** Verified third-party Operators (e.g., Payment Gateways, Cloud Hosting) under strict Data Processing Agreements.
- 7.4. **Information Security:** We utilize Field-Level Encryption, Zero-Trust Admin Access, and Blockchain Integrity Anchors to ensure data safety and prevent unauthorized access.

8. PROCEDURE TO REQUEST ACCESS TO RECORDS

To request access to a record held by Kagiso Le Tshepiso (Pty) Ltd:

1. Use the prescribed Form 2 ([Form 2: Request for Access to Record](#)), available on the Information Regulator's website.
2. Address your request to the Information Officer and email it to compliance@kagisoletshepiso.com.
3. Provide sufficient details to enable the Information Officer to identify the record(s) requested, the requester's proof of identity, and the specific right the requester is seeking to exercise or protect.
4. If applicable, our Information Officer will issue an invoice for the prescribed request fee before processing your request.

9. GROUNDS FOR REFUSAL OF ACCESS

The company may lawfully refuse access to records on grounds including, but not limited to:

- Mandatory protection of the privacy of a third party who is a natural person (including users on the SylX platform).
- Mandatory protection of the commercial information of a third party.
- Mandatory protection of the company's own commercial information, including trade secrets, proprietary AI logic (The "Bouncer" or "Architect" code), and financial models.
- Information that is privileged from production in legal proceedings.
- Mandatory protection of the safety of individuals and the protection of property.
- The research information of a third party or the company, if its disclosure would expose the researcher, the third party, or the matter itself to serious disadvantage.

Requests for information will be evaluated by the Information Officer within 30 days of receipt. Requesters will be notified in writing whether their request has been granted or refused, along with reasons for any refusal.

10. UPDATING OF THE MANUAL

Kagiso Le Tshepiso (Pty) Ltd will update this manual on a regular basis, or as necessary when material changes occur regarding the categories of records held or the processing operations of personal information. The current version will always be the one made available across our primary distribution channels.

11. AVAILABILITY OF THE MANUAL

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This manual is permanently published and accessible to the public on our official corporate website at www.kagisoletshepiso.com, and the SylX platform. A copy will also be provided to the Information Regulator upon their specific request.

Signed at Sephaku Village on this 30th day of July 2026.

A handwritten signature in black ink, appearing to read 'Ronny Lepalakgwane Mathibela', written over a horizontal line.

Ronny Lepalakgwane Mathibela

Chief Executive Officer & Information Officer

Kagiso Le Tshepiso (Pty) Ltd