

PAIA MANUAL

Promotion of Access to Information Act, 2000 (Act 2 of 2000)

Section 51 Manual for a Private Body

Private Body:	Madelein Vermeulen, trading as Online Launch Maven
Trading Names:	Online Launch Maven; TrueLane™; truelane.online
Effective Date:	10 July 2026
Last Updated:	10 July 2026

PART A: INFORMATION ABOUT THE PRIVATE BODY

1. Contact Details of the Head of the Private Body / Information Officer

Detail	Information
Name of Private Body	Madelein Vermeulen, trading as Online Launch Maven
Trading Name(s)	Online Launch Maven; TrueLane™; truelane.online
Head of Private Body / Information Officer	Madelein Vermeulen
Postal Address	GK15 Waterblom Drive, Still Bay, 6674, South Africa
Street Address	GK15 Waterblom Drive, Still Bay, 6674, South Africa
Telephone Number	+27 82 044 0494
Email Address	madelein@onlinelaunchmaven.com
Website	www.onlinelaunchmaven.com · www.truelane.online
Business Hours	Monday to Friday, 09:00 – 17:00 (South African Standard Time)

2. Description of the Guide on How to Use PAIA

The Information Regulator (South Africa) has published a Guide in terms of Section 10 of PAIA, which explains how to exercise your right of access to information in terms of the Act. The Guide also provides information on the remedies available to you if your request for access to information is refused.

How to obtain the Guide:

- Download from the Information Regulator's official website: www.inforegulator.org.za
- Request a copy from the Information Officer using the contact details above
- Available in all 11 official South African languages

PART B: RECORDS HELD BY THE PRIVATE BODY

3. Categories of Records Available Without a PAIA Request

The following records are routinely available to the public without the need to submit a formal PAIA request:

For Online Launch Maven (www.onlinelaunchmaven.com):

Category	Description	Where Available
Terms & Conditions	Governs the use of the Online Launch Maven website and general business terms	www.onlinelaunchmaven.com
Privacy Policy	Explains how personal information is handled on the Online Launch Maven website	www.onlinelaunchmaven.com
Earnings Disclaimer	Important limitations, disclosures regarding income potential, and no-guarantee statements	www.onlinelaunchmaven.com
Published Content	Blog posts, articles, and educational materials	www.onlinelaunchmaven.com

For TrueLane (www.truelane.online):

Category	Description	Where Available
Terms of Service	Governs use of TrueLane service, purchases, intellectual property, disclaimers, and dispute resolution	www.truelane.online
Privacy Notice	Explains how personal information is collected, processed, stored, and shared; POPIA rights	www.truelane.online
Disclosures and Disclaimer	Educational purpose statement, AI fallibility notice, assessment limitations	www.truelane.online
Product Information	Descriptions of TrueLane features, assessment process, and pricing	www.truelane.online

General Compliance:

Category	Description	Where Available
PAIA Manual	This document	www.truelane.online and www.onlinelaunchmaven.com

4. Records Available in Accordance with Other Legislation

Records may be kept where applicable under the following South African legislation:

- **Companies Act 71 of 2008** (sole proprietorship registration and business records)
- **Consumer Protection Act 68 of 2008** (consumer transaction records, complaints)
- **Electronic Communications and Transactions Act 25 of 2002** (electronic records, website compliance)
- **Value-Added Tax Act 89 of 1991** (tax invoices, input/output tax records)

- **Income Tax Act 58 of 1962** (financial records, tax returns)
- **Protection of Personal Information Act 4 of 2013 (POPIA)** (personal information processing records)
- **Promotion of Access to Information Act 2 of 2000 (PAIA)** (this manual, access request records)
- **Copyright Act 98 of 1978** (intellectual property records)
- **Common Law and Customary Law** (contractual records)

The applicability of any specific legislation depends on the nature of the record and the operations of the private body at the relevant time.

5. Subjects on Which Records Are Held and Categories of Records

5.1 Customer and Account Records

Category	Description
Account registration details	Email addresses, usernames, registration dates
Profile information	Skills, passions, availability, budget preferences, operating country
Assessment records	Assessment responses, lane scores, completed assessments
Generated outputs	Concepts, blueprints, launch plans, progress tracking data
Support correspondence	Email communications, support tickets, query resolutions
Access and entitlement records	Purchase status, product identifiers, access levels, credit balances

5.2 Financial and Transaction Records

Category	Description
Transaction records	Purchase identifiers, transaction dates, amounts, currency
Tax records	VAT invoices, input/output tax calculations, tax correspondence
Payment processing records	Transaction confirmations and settlement records from Paystack
Accounting records	Income records, expense records, bank statements
Dispute records	Refund requests, billing error investigations, chargeback records

5.3 Supplier and Service Provider Records

Category	Description
Hosting records	Web hosting service agreements, invoices, technical configurations (e.g., Hostinger)
Database and infrastructure records	Database service agreements, usage records (e.g., Supabase)
AI and technology service provider records	Usage records, API logs, and agreements for AI/LLM providers (such as Groq, OpenAI, OpenRouter, or Google AI) and other third-party technical integrations used in service delivery
Payment processor records	Payment gateway agreements and settlement reports (e.g., Paystack)

Category	Description
Affiliate programme records	Approved affiliate details, referral records, commission records
Professional adviser records	Legal, accounting, or consulting correspondence and advice
Security provider records	Security service agreements, incident reports

5.4 Product and Technical Records

Category	Description
Software development records	Code repositories (where applicable), version histories, development logs
Assessment and scoring records	Scoring algorithms, assessment logic, validation records
Intellectual property records	Trademark registrations, copyright notices, licensing agreements
Website records	Website content, configurations, analytics data
Security records	Security incident logs, vulnerability assessments, access control configurations
Backup and recovery records	Backup schedules, recovery procedures, restoration logs

5.5 Operational and Governance Records

Category	Description
Policy documents	Terms of Service, Privacy Notice, Disclosures, Earnings Disclaimers, this PAIA Manual
Internal procedures	Operational procedures, quality assurance processes
Business correspondence	Email communications with suppliers, partners, professional advisers
Complaints and feedback records	User complaints, feedback received, resolution records
Regulatory correspondence	Communications with the Information Regulator, SARS, or other authorities

5.6 Personnel Records (if applicable)

Category	Description
Employment contracts	Contracts of employment, independent contractor agreements
Remuneration records	Salary/payment records, leave records
Performance records	Performance assessments, disciplinary records (if applicable)

PART C: POPIA PERSONAL INFORMATION PROCESSING

6. Personal Information Processing Particulars

In accordance with the updated PAIA requirements incorporating POPIA obligations, the following information is provided regarding the processing of personal information:

6.1 Categories of Data Subjects

Personal information is processed in relation to the following categories of data subjects:

- Website visitors
- Account holders and registered users
- Purchasers of TrueLane digital access
- Assessment participants
- Newsletter subscribers (if applicable)
- Affiliate programme participants
- Job applicants (if applicable)
- Complainants and correspondents

6.2 Categories of Personal Information Collected

Category	Types of Information
Identifiers	Email address, username, IP address, device identifiers
Profile Information	Skills, passions, availability, budget preferences, operating country
Assessment Data	Assessment responses, lane scores, generated outputs
Transaction Data	Purchase identifiers, transaction amounts, product identifiers, entitlement status
Technical Data	Browser type, device information, log data, session information
Communication Data	Email correspondence, support queries, feedback

Note: Full card/bank details are not stored by Online Launch Maven. Paystack processes checkout and card payments; Online Launch Maven remains the seller and is responsible for taxes, refunds, receipts, compliance, and other merchant obligations.

6.3 Purposes of Processing

Personal information is processed for the following purposes:

- Creating and securing user accounts
- Providing the TrueLane assessment and generating AI-assisted outputs
- Personalising assessment results and recommendations
- Managing access credits and entitlements
- Processing and reconciling purchases via Paystack
- Communicating service messages, updates, and support responses
- Preventing fraud, abuse, and unauthorised access
- Complying with legal obligations (tax, consumer protection, data protection)
- Improving service reliability, functionality, and user experience
- Administering the affiliate programme (where applicable)

Legal bases for processing include: consent, performance of a contract, legal obligations, and legitimate interests in operational and security matters, depending on the specific processing activity.

6.4 Recipients of Personal Information

Personal information may be shared with the following categories of recipients to deliver the service:

Recipient Category	Purpose	Location
Database & Infrastructure Providers	Authentication, database hosting, and infrastructure support (e.g., Supabase, Hostinger)	International
AI and Technology Service Providers	Processing relevant profile, assessment, or output context to generate requested AI-assisted content. Providers may change and currently include or may include services such as Groq, OpenAI, OpenRouter, or Google AI.	International
Payment Processors	Processing checkout and card payments and providing transaction and settlement records (e.g., Paystack)	International
Professional Advisers	Legal, accounting, or consulting advice as needed	South Africa
Regulatory Authorities	Where lawfully required (e.g., Information Regulator, SARS)	South Africa

Online Launch Maven does not sell personal information to third parties.

6.5 Cross-Border Transfers

Personal information may be transferred to and processed in countries outside South Africa by the technology providers listed above. Reasonable safeguards are implemented in accordance with POPIA requirements for cross-border processing, including:

- Contractual obligations with service providers regarding data protection
- Use of providers with appropriate security certifications and standards
- Ensuring transfers are necessary for service delivery and subject to appropriate protections

6.6 Security Safeguards

The following technical and organisational measures are implemented to protect personal information:

- **Access controls:** User authentication, role-based access, secure login credentials
- **Password protection:** Strong password requirements, secure password storage practices
- **Transmission security:** Encryption of data in transit (TLS/SSL)
- **Provider controls:** Due diligence on service provider security practices, contractual security obligations
- **Operational measures:** Regular security reviews, incident response procedures, backup and recovery processes
- **Session security:** Secure session management, automatic session timeouts

Note: While reasonable safeguards are implemented, no internet-based service can guarantee absolute security.

6.7 Retention Periods

Personal information is retained only for as long as reasonably necessary for:

- The purposes described above

- Delivery of account access and purchased digital content
- Resolution of disputes or complaints
- Security and fraud prevention
- Compliance with legal and tax obligations (typically 5 years for financial/tax records)

Thereafter, personal information is deleted or de-identified where appropriate and lawful.

PART D: HOW TO REQUEST ACCESS TO RECORDS

7. Procedure for Requesting Access

Requests for access to records must comply with the requirements of PAIA. To make a valid request:

7.1 Use the Prescribed Form

Requests must be made on the current prescribed PAIA request form (Form 2), which is available from:

- The Information Regulator's website: www.inforegulator.org.za
- The Information Officer upon request

7.2 Submit the Request

Completed request forms must be submitted to the Information Officer at:

Email: madelein@onlinelaunchmaven.com

Post: GK15 Waterblom Drive, Still Bay, 6674, South Africa

7.3 Required Information

Your request must include:

- Sufficient details to identify the record(s) requested
- The right you seek to exercise or protect if access is granted
- An explanation of why the record is required for the exercise or protection of that right
- Your preferred form of access (e.g., copy, transcription, inspection)
- Your full name, identity number, and contact details (postal address, email, phone)
- If acting on behalf of another person, proof of capacity/authority to make the request

7.4 Requester Obligations

- A requester must identify the right they seek to exercise or protect and explain why the requested record is necessary for that purpose
- Requesters acting for another person must provide satisfactory proof of authority
- False or misleading information in a request may constitute an offence

8. Fees

8.1 Request Fee

A request fee may be payable upon submission of a PAIA request, as prescribed by the regulations at the time of the request.

8.2 Access Fee

If access is granted, an access fee may be charged to cover the costs of reproduction, preparation, and postage. The access fee will be calculated in accordance with the prescribed fee structure.

8.3 Fee Notification

The Information Officer will notify the requester of any applicable fees before processing the request. Access will not be provided until the required fees have been paid.

8.4 Exemptions

- The first hour of search time is free
- Personal information of the requester may be provided free of charge in certain circumstances
- Records routinely available without a PAIA request (see Section 3) are provided free of charge

9. Decision and Response Periods

The Information Officer will:

- Acknowledge receipt of the request
- Make a decision within 30 days of receiving the request
- Notify the requester of the decision, including any applicable fees or grounds for refusal
- If an extension of time is required, notify the requester within the initial 30-day period

10. Grounds for Refusal

Access to records may be refused in accordance with the grounds set out in PAIA, including but not limited to:

- Mandatory protections (e.g., records containing personal information of third parties, trade secrets, confidential commercial information)
- Discretionary protections (e.g., records where disclosure would constitute an actionable breach of confidence)
- Records that would endanger the life or physical safety of any person
- Records protected by legal professional privilege

If access is refused in part, access will be granted to the remainder of the record where reasonably practicable.

PART E: REMEDIES

11. Internal Appeal

If your request is refused, you may lodge an internal appeal with the Information Officer within 30 days of being notified of the refusal, setting out the grounds of appeal.

12. External Remedies

If you are dissatisfied with the outcome of your request or appeal, the following remedies are available:

12.1 Complaint to the Information Regulator

You may lodge a complaint with the Information Regulator (South Africa) regarding the handling of your PAIA request.

Information Regulator Contact Details:

- Website: www.inforegulator.org.za
- Email: enquiries@inforegulator.org.za
- Phone: 010 023 5200 / Toll Free: 0800 017 160
- Address: Woodmead North Office Park, 54 Maxwell Drive, Woodmead, Johannesburg, 2191

12.2 Application to Court

You may apply to a competent court for relief under PAIA, including an order requiring access to a record.

Note: Specific procedures and time limits apply. Seek current official guidance or legal advice before pursuing external remedies.

PART F: AVAILABILITY AND REVISION

13. Availability of This Manual

This PAIA Manual is available:

- On the TrueLane website: www.truelane.online
- On the Online Launch Maven website: www.onlinelaunchmaven.com
- From the Information Officer upon request (free of charge for the first copy)

14. Revision of This Manual

This manual will be reviewed and updated:

- When there are material changes to record-keeping practices
- When there are material changes to legal requirements (PAIA, POPIA, or related legislation)
- When there are changes to the structure, contact details, or operations of the private body
- At least annually to ensure ongoing accuracy and compliance

The "Last Updated" date at the beginning of this manual indicates when it was most recently revised.

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This PAIA Manual has been prepared in accordance with Section 51 of the Promotion of Access to Information Act 2 of 2000 (PAIA), as amended, and incorporates the personal information processing requirements of the Protection of Personal Information Act 4 of 2013 (POPIA).

For official guidance on PAIA and POPIA, please consult the Information Regulator (South Africa) at www.inforegulator.org.za.