

RECONIXE

PAIA MANUAL

Promotion of Access to Information Act Manual

Prepared under section 51 of the Promotion of Access to Information Act 2 of 2000

Last updated: 24 September 2026

1. Introduction and purpose

This manual is prepared for Reconixe under section 51 of the Promotion of Access to Information Act 2 of 2000 (PAIA). It explains the records held by Reconixe, how a person may request access to those records, and information relevant to the processing of personal information under the Protection of Personal Information Act 4 of 2013 (POPIA).

PAIA gives effect to the constitutional right of access to information, subject to the requirements and lawful grounds for refusal set out in PAIA and other applicable law.

2. Details of the private body

Operator: Cedric Is'imange Benonga

Capacity: Individual / Sole Proprietor

Trading name: Reconixe

Jurisdiction: South Africa

Physical address: 11 Woodland Road, Woodstock, Cape Town, Western Cape, South Africa

Postal address: Same as the physical address above

Telephone: +27 64 299 2742

Fax: Not applicable

Email: support@reconixe.com

Website: <https://reconixe.com>

3. Information Officer contact details

Information Officer: Cedric Is'imange Benonga

Deputy Information Officer: None currently designated

Email: support@reconixe.com

Telephone: +27 64 299 2742

Fax: Not applicable

Address: 11 Woodland Road, Woodstock, Cape Town, Western Cape, South Africa

4. PAIA Guide availability

The Information Regulator publishes a guide explaining how to use PAIA and how to exercise rights under the Act. The guide is available from the Information Regulator through its official website and may also be requested directly from the Information Regulator.

5. Records automatically available

Information published on the Reconix website, including public product information, pricing, Help Center material, the Privacy Policy, Terms of Service, Security page, and this manual, is available without a PAIA request. Other records are not automatically available unless Reconix makes them public or applicable law requires their disclosure.

6. Categories of records held by Reconix

Reconix may hold the following categories of records where applicable:

- account and profile records;
- organization, membership, and role records;
- workflow records and workflow versions;
- uploaded CSV and XLSX reconciliation files and selected worksheets;
- reconciliation runs, matching results, and exception records;
- evidence, notes, reviews, resolutions, and related history;
- reports and exports;
- audit and operational events;
- plan, allowance, and usage records;
- subscription and billing identifiers and related billing events;
- support tickets, support messages, and email correspondence; and
- security and technical operational records.

A category listed here does not mean that every record is held or that access will necessarily be granted. Access remains subject to PAIA, confidentiality, privacy, security, ownership, privilege, and other applicable protections.

7. Records available in accordance with other legislation

Where applicable, Reconix may hold records that are maintained, disclosed, or made available in accordance with legislation other than PAIA. These may include:

- personal-information records and data-subject rights administered under the Protection of Personal Information Act 4 of 2013;
- tax, transaction, accounting, and related records maintained or supplied to authorised authorities where required under applicable South African tax legislation, including the Tax Administration Act 28 of 2011 and Income Tax Act 58 of 1962; and
- electronic transaction and communication records where applicable under the Electronic Communications and Transactions Act 25 of 2002.

The applicability of particular legislation depends on the record and circumstances. Inclusion in this section does not mean that a record is automatically available to the general public.

8. How to request access to records

A PAIA or access request may be sent to support@reconixe.com. The request should identify the requester, describe the records sought with enough detail to locate them, explain the form in which access is requested, provide contact details, and state the right the requester seeks to exercise or protect and why the record is required.

Where required, a requester may be asked to use the current prescribed Form 02 - Request for Access to Record under the applicable PAIA regulations. The current form is available from the Information Regulator's official PAIA and forms resources; Reconixe does not host or reproduce the Regulator's form.

Reconixe may ask for proof of identity, authority to act for another person, or further information needed to process the request. Any prescribed form and fee requirements under PAIA apply. Reconixe will consider the request under PAIA and may grant, partially grant, or refuse access where the Act permits or requires it. The requester will be informed of the outcome and any available review or complaint steps.

9. POPIA-related processing information

Reconixe processes personal information to provide and secure its reconciliation operations service. Processing may include collecting, recording, organizing, storing, updating, retrieving, using, transmitting, restricting, and deleting information where appropriate.

Customers decide what information they upload for reconciliation and remain responsible for having lawful authority to collect, upload, use, and instruct Reconixe to process that information. Reconixe processes customer-uploaded data to provide the requested service and related security, support, and administration.

10. Categories of data subjects

Personal information processed by Reconixe may relate to:

- users of Reconixe;
- organization members and authorized users;
- customer representatives;
- support contacts and correspondents;
- billing and customer contacts; and
- people whose information may appear inside customer-uploaded reconciliation data.

11. Categories of personal information processed

Depending on how Reconixe is used, personal information may include:

- names, email addresses, account identifiers, and profile information;
- organization membership, role, and access information;
- contact details and communications;
- billing-customer and subscription identifiers;
- service usage, audit, support, security, and operational information; and
- personal information contained in customer-uploaded files, reconciliation results, exceptions, evidence, notes, reports, and exports.

12. Purposes of processing

Reconix may process personal information to:

- create, authenticate, and administer accounts;
- manage organizations, membership, roles, and authorized access;
- receive and validate uploads, run reconciliations, present results and exceptions, preserve evidence and history, and produce reports and exports;
- administer plans, subscriptions, billing, and usage allowances;
- respond to support requests and send service communications;
- provide requested, assistive Exception Explainer output without changing exception state;
- maintain security, prevent abuse, troubleshoot, and investigate incidents; and
- meet legal, regulatory, and record-keeping obligations.

13. Recipients and categories of recipients

Information is made available to authorized users of the relevant customer organization according to their roles and to Reconix personnel or service operations where needed to provide, secure, administer, or support the service. It may also be disclosed where required by law or to establish, exercise, or defend legal rights.

Confirmed service providers relevant to current operations include:

- Lovable for application hosting and managed service infrastructure;
- Supabase technology for database, authentication, and storage capabilities;
- Paddle as Merchant of Record for paid subscriptions and payments;
- Lovable AI Gateway and its routed AI provider for Exception Explainer processing that an authorized user requests; and
- Resend for service and support email delivery.

These providers may process information to supply their services, subject to their applicable terms, privacy commitments, and contractual arrangements. This manual does not make unverified claims about provider certifications, data residency, or AI model-training practices.

14. Cross-border processing

Reconix's service providers may process information in countries other than the country in which a data subject is located. Cross-border processing is subject to applicable law and safeguards available under relevant provider arrangements. Reconix does not guarantee that all information remains in one country.

15. Security safeguards

Reconix uses authentication, organization-based access controls, role-based permissions, server-side authorization for privileged operations, database row-level security where appropriate, restricted service operations, protected storage paths, audit and event history, server-side handling of private credentials, and HTTPS delivery through its production hosting platform.

The AI Exception Explainer is assistive and read-only and has no authority to resolve or edit exceptions. No technical or organizational measure can guarantee absolute security. Reconix does not claim PAIA, POPIA, ISO, SOC, PCI, or other security certification in this manual.

16. Availability of the manual

The current manual is available:

- on the Reconixe website at <https://reconixe.com/paia>;
- from the Information Officer at support@reconixe.com;
- for public inspection at Reconixe's principal place of business at 11 Woodland Road, Woodstock, Cape Town, Western Cape, South Africa during normal business hours; and
- to the Information Regulator upon request as required by law.

Public inspection of the manual at the principal place of business is without charge. Reasonable reproduction or delivery costs permitted by law may apply to requested copies in another form.

17. Updating of the manual

Reconixe may update this manual when its operations, records, processing activities, service providers, contact details, or legal obligations change. The current version and its updated date will be made available on the Reconixe PAIA page.

Issued by:

Cedric Is'imange Benonga

Sole Proprietor / Information Officer

Reconixe

24 September 2026