



PUBLIC COMPLIANCE DOCUMENT

PAIA MANUAL

Prepared in terms of section 51 of the Promotion of Access to Information Act 2 of 2000, as amended



Luminera (Pty) Ltd

Registration number 2026/556387/07
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1. Acronyms and definitions

Term	Meaning
IO	Information Officer
PAIA	Promotion of Access to Information Act 2 of 2000, as amended
POPIA	Protection of Personal Information Act 4 of 2013
Regulator	Information Regulator (South Africa)
Republic	Republic of South Africa
Luminera / Company / Body	Luminera (Pty) Ltd, registration number 2026/556387/07

2. Purpose of this Manual

This Manual explains the records held by Luminera, how a person may request access to those records, and how Luminera processes and protects personal information. It is intended to assist members of the public to:

- identify records that are available without a formal PAIA request;
- understand the subjects and categories of records held by Luminera;
- obtain the contact details of the Information Officer;
- understand how to use the Information Regulator's PAIA Guide and prescribed request forms;
- understand the categories of personal information processed, the purposes of processing, possible recipients, cross-border transfers and security safeguards; and
- understand the procedure, fees, time periods and remedies applicable to a request for access to records.

Access to a record is not automatic merely because the record is listed in this Manual. Every request will be considered in accordance with PAIA, POPIA and any other applicable law, including lawful grounds for refusal and the rights of third parties.

3. Company profile and key contact details

3.1 Company information

Item	Details
Registered name	Luminera (Pty) Ltd
Trading name	Luminera
Registration number	2026/556387/07
Nature of business	South African supplier of transparent display, smart film, switchable glass and specialist intelligent-glass technologies, together with related product guidance, manufacturer liaison, quoted logistics and optional remote content-change services under separate agreement.
Website	https://lumineraafrica.com
General email	info@lumineraafrica.com
Telephone / WhatsApp	078 909 7747

3.2 Information Officer

Item	Details
Name	Michael Bester
Designation	Director, Operational Head and Information Officer
Telephone	078 909 7747
Email for PAIA and POPIA requests	info@lumineraafrica.com
Deputy Information Officer	No Deputy Information Officer is designated at the date of this Manual.

Luminera has appointed an eServices administrative officer for portal administration. That administrative role is not a Deputy Information Officer appointment and does not replace the Information Officer.

3.3 Head office and service address

Contact type	Details
Physical address	61 Meerkat Street Kathu Kathu Northern Cape 8446
Postal address	Same as physical address
General access-to-information email	info@lumineraafrica.com
Telephone / WhatsApp	078 909 7747
Public inspection	During normal business hours by prior arrangement with the Information Officer.

4. Guide on how to use PAIA

The Information Regulator has published a Guide explaining how to exercise rights under PAIA and POPIA. The Guide includes the objects of the legislation, the manner and form of requests, available assistance, fees and remedies.

The Guide and prescribed PAIA forms are available from the Information Regulator. A copy of the Guide can also be requested from Luminera's Information Officer and can be made available in English and Afrikaans for inspection by prior arrangement.

Resource	How to access it
Information Regulator PAIA resources	Visit the Information Regulator website at https://infoeregulator.org.za/paia/
Form 2 - Request for Access to Record	Available from the Information Regulator's PAIA forms page and may be requested from info@lumineraafrica.com .

Resource	How to access it
Assistance from Luminera	Email info@lumineraafrica.com or call 078 909 7747.

5. Records available without a formal PAIA request

The following records are generally available without submitting Form 2, subject to availability, copyright, confidentiality and any applicable terms of use:

Category	Examples	Website	On request
Public company information	Public business description, contact information, registration number and leadership summaries	Yes	Yes
Public product information	Product catalogue, product-family descriptions, public technical summaries and supplier-reference information approved for publication	Yes	Yes
Public corporate material	Company profile and approved public brochures	Yes	Yes
Compliance material	This PAIA Manual and published privacy or website notices	Yes	Yes
Website information	Public website pages, FAQs, industries, solutions and enquiry information	Yes	Yes

Before the public website is launched, these records may be requested by email. Confidential price lists, supplier costs, internal margins, unpublished technical records and private administrative documents are not automatically available.

6. Records maintained in accordance with other legislation

Luminera maintains records required by applicable South African legislation. The following list is indicative and not exhaustive. Availability remains subject to the relevant legislation and lawful restrictions.

Category of records	Applicable legislation (where relevant)
Company registration, memorandum of incorporation, director, shareholder, beneficial ownership and corporate governance records	Companies Act 71 of 2008 and regulations
Accounting, banking, invoices, payment, tax and supporting records	Companies Act 71 of 2008; Income Tax Act 58 of 1962; Tax Administration Act 28 of 2011
Customer quotations, orders, contracts, consumer communications and transaction records	Consumer Protection Act 68 of 2008; Electronic Communications and Transactions Act 25 of 2002
Personal information, privacy, access requests and security-compromise records	POPIA 4 of 2013; PAIA 2 of 2000; applicable regulations

Category of records	Applicable legislation (where relevant)
Import, freight, customs and delivery records	Customs and Excise Act 91 of 1964 and applicable import requirements
Digital, cybersecurity and electronic evidence records	Electronic Communications and Transactions Act 25 of 2002; Cybercrimes Act 19 of 2020, where applicable

7. Subjects and categories of records held by Luminera

Subject	Categories of records
Corporate governance	Registration documents; memorandum of incorporation; director and shareholder records; beneficial ownership records; resolutions; statutory registers; policies; Information Officer registration and compliance records.
Finance and tax	Banking records; quotations; invoices; credit notes; EFT and proof-of-payment records; expense records; landed-cost calculations; accounting records; tax submissions and supporting documents.
Customers and prospective customers	Enquiries; quote-form submissions; contact details; project location; product interests; requirements; correspondence; quotations; contracts; order approvals; delivery instructions; support records; complaints and dispute records.
Suppliers and manufacturers	Supplier contact details; catalogues; quotations; price lists; technical schedules; product confirmations; purchase orders; manufacturing updates; warranties; quality records; commercial correspondence and agreements.
Products and technical information	Product families, models, specifications, supplier documents, configuration records, approval schedules, content-control requirements, manufacturer documentation and controlled technical references.
Logistics and imports	Freight quotations; shipping documents; packing lists; customs and clearing records; courier records; delivery instructions; insurance records; import costs and delivery confirmations.
Website and digital systems	Website content; quote records; database records; access logs; security events; backups; email records; domain, DNS, hosting and system administration records; incident and troubleshooting records.
Legal and compliance	PAIA and POPIA records; privacy notices; terms; contracts; legal advice; regulatory correspondence; request registers; complaints; security-compromise records; retention and incident records.
Public relations and marketing	Approved company profile; product catalogue; public images; website text; brand material; published notices and public communications. Luminera does not currently conduct direct-marketing campaigns.

Subject	Categories of records
Directors and authorised representatives	Identity and contact details where required; appointment records; resolutions; access authorisations; corporate correspondence; declarations and governance records.

Luminera has no employees at the date of this Manual. If employees are appointed in future, employment-related record categories and personal-information processing will be added when this Manual is updated.

8. Processing of personal information

8.1 Purposes of processing

Luminera processes personal information only for legitimate business, contractual, legal and security purposes, including:

- responding to enquiries and assessing project requirements;
- preparing quotations and managing customer approvals, orders and contracts;
- communicating product and configuration requirements to suppliers and manufacturers;
- arranging import, freight, customs, courier and delivery services;
- processing EFT payments, accounting, tax and financial records;
- providing agreed remote content-change services under a separate agreement;
- operating, securing, maintaining and troubleshooting the website, email and business systems;
- maintaining supplier, client and professional-adviser relationships;
- complying with legal, regulatory, corporate-governance and recordkeeping obligations;
- preventing fraud, managing risk, resolving disputes and enforcing contractual rights; and
- responding to PAIA, POPIA or other lawful requests.

Luminera does not intentionally collect special personal information or information about children through its ordinary website or quotation process. Such information should not be submitted unless specifically and lawfully required.

8.2 Categories of data subjects and personal information

Data subject category	Personal information that may be processed
Prospective and existing customers; customer representatives	Name, company, job title, email, phone number, company or registration details, physical or delivery address, project location, product interests, requirements, correspondence, quotations, contracts, order and delivery details, payment references and proof of payment.
Website visitors and form users	Form information, IP address, browser or device information, access date and time, requested pages, security events, server logs and limited analytics information.
Suppliers, manufacturers and service providers; their representatives	Names, company details, registration and tax details where required, contact details, addresses, bank details, agreements, quotations, technical and commercial correspondence, performance and payment records.
Directors, shareholders and authorised representatives	Names, contact details, identity or registration details where legally required, signatures, appointment records, corporate roles, declarations, access authorisations and governance records.
Professional advisers and logistics partners	Names, firms, contact details, instructions, correspondence, billing information, delivery and customs information.

Data subject category	Personal information that may be processed
Regulators, officials, requesters and complainants	Names, contact details, identification or authority where required, requests, complaints, correspondence, decisions and supporting documents.

8.3 Recipients or categories of recipients

Information category	Possible recipients
Contact, project and order information	Luminera directors and authorised representatives; relevant suppliers and manufacturers; client-appointed professionals where necessary.
Delivery and logistics information	Manufacturers, freight forwarders, customs-clearing agents, insurers, couriers, transport providers and delivery recipients.
Financial and payment information	Banks, accountants, tax advisers, auditors and authorities where required. Luminera currently accepts EFT and does not collect payment-card details.
Website, email and technical information	Email, cloud, domain, DNS, hosting, database, backup, cybersecurity, analytics and technical-support providers.
Legal and compliance information	Attorneys, professional advisers, courts, regulators, law-enforcement bodies and government authorities where permitted or required by law.

8.4 Planned cross-border processing and transfers

Personal information may be transferred to, stored in, or accessed from outside South Africa when reasonably necessary for Luminera's operations. This may include:

- sending limited customer, project, configuration or delivery information to manufacturers or suppliers in China or other relevant supplier jurisdictions;
- using international email, cloud, website, domain, security, backup or support providers whose systems or personnel may be located in multiple jurisdictions; and
- sharing necessary information with international freight, insurance or logistics partners.

Cross-border transfers will be limited to information reasonably necessary for the relevant purpose and will be managed in accordance with section 72 of POPIA, including through contractual safeguards, appropriate service-provider terms, confidentiality obligations, data minimisation, secure transmission and access controls, or another lawful transfer condition. Luminera will not routinely send identity documents, banking credentials or unrelated customer correspondence to foreign suppliers.

8.5 Information-security safeguards

Luminera applies reasonable technical and organisational safeguards appropriate to its size, systems and risk profile, including:

- password-protected accounts and devices, with access restricted to authorised directors;
- multi-factor authentication where available;
- device PINs or passwords, automatic software and security updates, and antivirus or built-in security protection;
- secure backups and recovery arrangements for important business records;
- encryption in transit through secure website, email and cloud services where supported;
- role-appropriate access controls, secure credential management and periodic access review;

- data minimisation, controlled sharing and secure deletion or de-identification when records are no longer required;
- selection and review of service providers with appropriate security and confidentiality measures; and
- incident handling, containment, investigation, notification and recordkeeping procedures for security compromises.

No security measure can guarantee absolute protection. Luminera will review safeguards as its systems, suppliers and business activities develop.

8.6 Retention and destruction

Luminera retains records only for as long as reasonably necessary for the purpose for which they were collected, to perform contracts, comply with legal and tax obligations, protect legitimate interests, resolve disputes or respond to audits, investigations or legal proceedings.

Quotations, contracts, invoices, proof of payment, supplier documents and necessary customer correspondence will be retained for applicable legal, accounting, tax and dispute-resolution periods. Many tax and accounting records are generally retained for at least five years from the applicable statutory starting point, and longer where an audit, investigation, complaint, litigation hold or dispute requires it. Records that are no longer required will be securely deleted, destroyed or de-identified where appropriate.

9. Procedure for requesting access to a record

9.1 How to submit a request

A requester must complete the prescribed Form 2 - Request for Access to Record - and submit it to the Information Officer by email or at the address in section 3. The requester should provide sufficient information to enable Luminera to identify the record and assess the request.

- the requester's full name and contact details;
- proof of identity or authority to act for another person, where required;
- a clear description of the requested record and any known reference, date or category;
- the form of access required, such as inspection, electronic copy or printed copy;
- the right the requester seeks to exercise or protect and why the requested record is required for that purpose, as required for access to a private-body record; and
- any accessibility, language or communication needs relevant to the request.

9.2 Processing time and third-party consultation

Luminera will ordinarily decide a valid request within 30 days after receipt, subject to any lawful extension under PAIA. The requester will be notified of an extension and the reasons for it. Where a requested record contains information relating to a third party, Luminera may be required to notify and consult that third party before deciding the request.

9.3 Fees

Prescribed request, search, preparation, reproduction, postal or other access fees may be payable where permitted by PAIA and its regulations. Luminera will notify the requester of any amount payable and the basis for the fee before access is provided. A requester may be required to pay a deposit where permitted by law.

9.4 Decision and possible refusal

Access may be granted in full, granted in part, transferred where legally appropriate, or refused on a ground permitted by PAIA. Grounds may include the protection of another person's privacy, confidential commercial information, privileged material, safety or security, research information, or records that cannot be disclosed without unlawfully harming Luminera or a third party. Any refusal will identify the relevant ground and available remedy, subject to lawful limits.

9.5 Remedies

There is generally no internal appeal against the decision of a private body. A requester who is dissatisfied with a decision or a failure to respond may lodge a complaint with the Information Regulator or seek appropriate relief from a court within the periods prescribed by law. The Information Regulator's complaint forms and guidance are available on its website.

10. Availability of this Manual

A copy of this Manual is available:

- on Luminera's website at <https://lumineraafrica.com> once the website is publicly launched;
- from Luminera's physical address during normal business hours by prior arrangement;
- by email request to info@lumineraafrica.com;
- to any person upon request, subject to any prescribed or reasonable reproduction fee; and
- to the Information Regulator upon request or through the Regulator's eServices upload facility.

The website footer may state only that Luminera is based in South Africa. The full physical and postal address is provided in this public PAIA Manual as required for access-to-information purposes.

11. Updating and review of the Manual

The Information Officer will review this Manual at least annually and whenever there is a material change to Luminera's contact details, business activities, record categories, service providers, cross-border processing, security safeguards, legal obligations or Information Officer arrangements. Updated versions will replace earlier versions on the website and in Luminera's compliance records.

12. Approval and issue

This Manual is issued on behalf of Luminera (Pty) Ltd by its Information Officer.

Name	Michael Bester
Capacity	Director, Operational Head and Information Officer
Signature	Signed original retained privately by Luminera (Pty) Ltd
Date	30 July 2026
Version	1.0 - English

Document note: This is the approved English version of Luminera's PAIA Manual for its English-language business operations. An additional language version may be prepared if legally required or reasonably needed for accessibility.