EXCO CAPITAL PAIA MANUAL

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

Effective date: 18 July 2026

1. Introduction

This Manual has been prepared by **Exco Capital (Pty) Ltd** in accordance with section 51 of the Promotion of Access to Information Act 2 of 2000, as amended ("PAIA"), and, where applicable, the Protection of Personal Information Act 4 of 2013 ("POPIA").

The purpose of this Manual is to:

1. describe the records held by Exco Capital;
2. explain how a person may request access to those records;
3. identify records that may be available without a formal request;
4. describe the categories of personal information processed by Exco Capital;
5. explain the purposes for which personal information is processed;
6. identify the persons or categories of persons to whom information may be supplied;
7. describe planned cross-border information flows;
8. describe the security measures used to protect personal information; and
9. provide the contact details of Exco Capital's Information Officer.

This Manual does not mean that every record described in it will automatically be disclosed. Access remains subject to PAIA, POPIA, other applicable law, confidentiality obligations, legal privilege, third-party rights and the grounds for refusal set out in PAIA.

2. Definitions

In this Manual:

"Exco Capital" means Exco Capital (Pty) Ltd.

"Information Officer" means the person designated by law as the Information Officer of Exco Capital and registered with the Information Regulator.

"Manual" means this PAIA Manual.

“PAIA” means the Promotion of Access to Information Act 2 of 2000, as amended.

“Personal information” has the meaning given to it in POPIA.

“POPIA” means the Protection of Personal Information Act 4 of 2013.

“Private body” has the meaning given to it in PAIA.

“Record” means recorded information, regardless of its form or medium, that is in the possession or under the control of Exco Capital.

“Requester” means a person who makes a request for access to a record under PAIA.

“TOM1” means Exco Capital’s Human–AI Opportunity Discovery System and Targeted Opportunity Matching and Monitoring platform.

3. Exco Capital’s Business

Exco Capital is an international technology-enabled deal-origination and investment-holding company that discovers, validates, and structures overlooked opportunities into executable, investable outcomes.

Its activities may include:

1. opportunity discovery and deal origination;
2. operation and development of TOM1;
3. structured Opportunity Search;
4. facilitated engagement between companies;
5. validation of potential opportunities;
6. commercial and investment structuring;
7. strategic, governance, operational and capital advisory services;
8. work performed through Facilitators and Professional Associates;
9. investment, co-investment and investment holding;
10. capital formation and introductions to capital partners;
11. incubation and capability-development programmes;
12. research, methodologies and intellectual-property development; and
13. collaboration with local and international ecosystem partners.

4. Company and Contact Details

Registered name: Exco Capital (Pty) Ltd
Registration number: [Insert company-registration number]
Registered address: [Insert registered address if different]

Principal business address:
Thornhill Office Park
84 Bekker Road
Johannesburg
South Africa

Postal address:

Building 9, Thornhill Office Park
84 Bekker Road
Johannesburg
South Africa

Website: www.excocapital.com
General email: exco@excocapital.com
Telephone or WhatsApp: +27 61 732 7041

5. Information Officer

The head of a private body is the Information Officer by virtue of office, unless the relevant responsibilities have been lawfully delegated.

Information Officer: G Botha
Position: Director
Email: support@excocapital.com
Telephone: +27 61 732 7041

Requests under PAIA and POPIA should be directed to the Information Officer.

The Information Officer must be registered with the Information Regulator before taking up the statutory duties assigned under POPIA.

6. The Information Regulator

The Information Regulator is responsible for monitoring and enforcing compliance with PAIA and POPIA.

The Regulator may be contacted at:

Information Regulator South Africa
JD House
27 Stiemens Street
Braamfontein
Johannesburg
2001

Postal address:
PO Box 31533
Braamfontein
Johannesburg
2017

Telephone: 010 023 5200
Toll-free number: 0800 017 160
General email: enquiries@inforegulator.org.za
Website: www.inforegulator.org.za

Current contact details should be verified on the Information Regulator's website before a complaint or formal submission is made.

7. The PAIA Guide

The Information Regulator has published a Guide explaining:

1. the objectives of PAIA;
2. how to make a request for access to records;
3. the assistance available from an Information Officer;
4. the remedies available where access is refused;
5. the fees that may be payable;
6. the rights of a requester;
7. the grounds on which access may be refused; and
8. how to lodge a complaint with the Information Regulator.

The Guide is available from:

1. the Information Regulator's website;
2. the Information Regulator's offices;
3. Exco Capital's Information Officer on request; and
4. other places prescribed by law.

A person may request a copy of the Guide using the prescribed form made available by the Information Regulator.

8. Availability of This Manual

This Manual is available:

1. on Exco Capital's website at **www.excocapital.com**;
2. from Exco Capital's Information Officer;
3. for inspection at Exco Capital's principal place of business during normal business hours, subject to reasonable prior arrangement; and
4. through the Information Regulator's PAIA Manual portal where submitted.

A reasonable copying fee may be charged where permitted by law.

9. Records Automatically Available

The following records may be available without a formal PAIA request, subject to Website access rules, confidentiality, intellectual-property rights and applicable law:

9.1 Website and public corporate information

1. Website content;
2. public company descriptions;
3. public contact details;
4. public executive or team biographies;
5. public purpose, values and positioning statements;
6. public news, announcements and articles;
7. published brochures and presentations;
8. public programme and event information;
9. public terms of use;
10. the Privacy Policy;
11. the Cookie Notice; and
12. this PAIA Manual.

9.2 Public TOM1 information

1. publicly available descriptions of TOM1;
2. public onboarding or participation information;
3. published explanations of Opportunity Search and Opportunity Discovery;

4. public Facilitator information;
5. public Professional Associate information; and
6. publicly released thought-leadership material.

9.3 Statutory and regulatory records

Records available from public registries may include:

1. company-registration information;
2. director information to the extent lawfully public;
3. registered-office information;
4. trade marks or intellectual-property registrations;
5. tax or regulatory status where publicly accessible; and
6. other records filed with public authorities.

9.4 Marketing and informational material

1. newsletters;
2. public notices;
3. public event invitations;
4. social-media content;
5. press releases;
6. public opportunity or programme descriptions; and
7. public investor-information notices that do not constitute offers.

The availability of a category does not mean that confidential, commercially sensitive, personal or privileged information within that category is automatically available.

10. Records Held by Exco Capital

Exco Capital may hold the following categories of records.

10.1 Corporate and governance records

1. Memorandum of Incorporation;
2. company-registration records;
3. statutory registers;
4. shareholder records;
5. share certificates and securities records;
6. board and shareholder resolutions;
7. board and committee minutes;
8. governance policies;

9. delegations of authority;
10. organisational structures;
11. director and officer records;
12. company-secretarial records;
13. corporate filings;
14. licences and approvals;
15. conflicts-of-interest records; and
16. corporate insurance records.

10.2 Financial and tax records

1. annual financial statements;
2. management accounts;
3. general ledgers;
4. budgets and forecasts;
5. bank records;
6. payment records;
7. invoices and receipts;
8. debtor and creditor records;
9. asset registers;
10. audit and assurance records;
11. tax returns and tax correspondence;
12. payroll records;
13. funding and financing records;
14. valuation records;
15. capital-raising records; and
16. investment and portfolio records.

10.3 Shareholder and investor records

1. shareholder registers;
2. shareholder communications;
3. subscription and transaction agreements;
4. investor expressions of interest;
5. investor contact and preference information;
6. eligibility and suitability information;
7. know-your-client and due-diligence records;
8. source-of-funds information;
9. investment committee records;
10. investor presentations;
11. confidential information memoranda;
12. valuation and transaction records;

13. capital-partner communications; and
14. portfolio reporting.

10.4 Client and participant records

1. enquiries;
2. application and onboarding records;
3. client agreements;
4. engagement letters;
5. scopes of work;
6. company profiles;
7. strategic-intent information;
8. opportunity-search records;
9. submitted commercial information;
10. meeting notes and correspondence;
11. service-delivery records;
12. programme participation;
13. invoices and payment information;
14. feedback and complaints; and
15. termination and closure records.

10.5 TOM1 records

1. TOM1 user and account records;
2. structured company information;
3. opportunity-search inputs;
4. strategic intent;
5. products and service information;
6. capability information;
7. market access information;
8. asset and capacity information;
9. constraints and business needs;
10. opportunity hypotheses;
11. potential matches;
12. validation records;
13. permissions and confidentiality settings;
14. introduction records;
15. user activity and system logs;
16. platform-development records;
17. artificial-intelligence and algorithmic outputs;
18. system testing and performance records;
19. aggregated analytics;

20. platform terms and participation agreements; and
21. TOM1 intellectual-property records.

10.6 Opportunity and transaction records

1. opportunity descriptions;
2. screening records;
3. strategic-fit assessments;
4. validation findings;
5. commercial assessments;
6. stakeholder maps;
7. due-diligence information;
8. transaction structures;
9. term sheets;
10. memoranda of understanding;
11. non-disclosure agreements;
12. shareholder and joint-venture agreements;
13. acquisition and disposal records;
14. partnership agreements;
15. capital-formation records;
16. valuation models;
17. governance designs;
18. implementation plans;
19. negotiation records;
20. legal and professional opinions; and
21. completed, deferred or declined opportunity records.

10.7 Facilitator records

1. applications;
2. profiles and qualifications;
3. onboarding records;
4. Facilitator agreements;
5. training records;
6. company allocations;
7. opportunity-validation records;
8. performance records;
9. quality and compliance records;
10. remuneration and participation-economics records;
11. complaints and disciplinary records;
12. confidentiality undertakings; and
13. communications.

10.8 Professional Associate records

1. professional profiles;
2. qualifications and licences;
3. applications and appointment records;
4. engagement agreements;
5. scopes of work;
6. project assignments;
7. professional outputs;
8. fee and participation arrangements;
9. performance and quality records;
10. conflicts-of-interest records;
11. insurance and regulatory information;
12. confidentiality undertakings; and
13. communications.

10.9 Ecosystem-partner records

1. partner profiles;
2. memoranda of understanding;
3. service agreements;
4. channel or referral arrangements;
5. collaboration records;
6. programme agreements;
7. opportunity and project records;
8. revenue-sharing or participation agreements;
9. performance records; and
10. communications.

10.10 Intellectual-property records

1. trade marks;
2. copyright works;
3. software and source-code records;
4. platform architecture;
5. methodologies;
6. process maps;
7. training materials;
8. books and publications;
9. research;
10. brand assets;
11. domain-name records;

12. licence agreements;
13. confidentiality agreements;
14. invention and development records;
15. data models;
16. algorithms and discovery logic; and
17. intellectual-property assignment records.

10.11 Information-technology records

1. IT policies;
2. systems and application records;
3. access-control records;
4. user-account records;
5. licences;
6. vendor agreements;
7. hosting and cloud-service records;
8. system-security logs;
9. backups;
10. cyber-risk assessments;
11. security incidents;
12. disaster-recovery records;
13. business-continuity records;
14. data inventories;
15. information-flow records; and
16. system-development records.

10.12 Privacy and POPIA records

1. privacy policies;
2. data-subject requests;
3. processing inventories;
4. lawful-basis assessments;
5. consent records;
6. objection and opt-out records;
7. operator agreements;
8. information-security assessments;
9. personal-information impact assessments;
10. retention schedules;
11. deletion and destruction records;
12. cross-border transfer assessments;
13. security-compromise records;
14. Information Regulator correspondence;

15. Information Officer registration records;
16. complaints; and
17. staff or participant privacy training records.

10.13 Human-resources and contractor records

Where applicable:

1. employee and contractor files;
2. employment and contractor agreements;
3. identity and contact information;
4. qualifications;
5. remuneration records;
6. leave records;
7. performance records;
8. disciplinary records;
9. occupational-health and safety records;
10. training records;
11. tax and statutory records;
12. benefit records; and
13. termination records.

10.14 Legal and compliance records

1. legal agreements;
2. legal opinions;
3. litigation and dispute records;
4. regulatory correspondence;
5. compliance policies;
6. due-diligence records;
7. fraud and risk records;
8. sanctions and watchlist screening;
9. complaints;
10. insurance claims;
11. legal notices; and
12. records subject to legal privilege.

10.15 Marketing and communication records

1. marketing strategies;
2. contact databases;
3. newsletter lists;
4. event records;

5. communication preferences;
6. consent and opt-out records;
7. website analytics;
8. social-media records;
9. public-relations records;
10. advertising material;
11. campaign records; and
12. media content.

10.16 Supplier and service-provider records

1. supplier applications;
2. supplier agreements;
3. contact information;
4. invoices and payment records;
5. performance records;
6. due-diligence records;
7. tax and compliance information;
8. operator agreements;
9. confidentiality agreements; and
10. termination records.

11. Records Held in Terms of Other Legislation

Exco Capital may retain records in accordance with legislation applicable to its operations, including, where relevant:

1. Basic Conditions of Employment Act 75 of 1997;
2. Companies Act 71 of 2008;
3. Compensation for Occupational Injuries and Diseases Act 130 of 1993;
4. Consumer Protection Act 68 of 2008;
5. Copyright Act 98 of 1978;
6. Electronic Communications and Transactions Act 25 of 2002;
7. Employment Equity Act 55 of 1998;
8. Financial Intelligence Centre Act 38 of 2001, where applicable;
9. Income Tax Act 58 of 1962;
10. Labour Relations Act 66 of 1995;
11. Occupational Health and Safety Act 85 of 1993;
12. Promotion of Access to Information Act 2 of 2000;
13. Protection of Personal Information Act 4 of 2013;

14. Skills Development Act 97 of 1998;
15. Tax Administration Act 28 of 2011;
16. Trade Marks Act 194 of 1993;
17. Unemployment Insurance Act 63 of 2001;
18. Value-Added Tax Act 89 of 1991; and
19. any other law applicable to a specific service, transaction, investment or business activity.

Inclusion of legislation in this list does not mean that every Act applies to every Exco Capital activity or record.

12. Processing of Personal Information

12.1 Purposes of processing

Exco Capital may process personal information for purposes including:

1. responding to enquiries;
2. onboarding companies and participants;
3. providing professional or platform services;
4. operating TOM1;
5. conducting Opportunity Discovery;
6. validating potential opportunities;
7. facilitating introductions;
8. structuring commercial and investment opportunities;
9. assessing investments;
10. performing due diligence;
11. managing shareholders and investors;
12. managing Facilitators and Professional Associates;
13. managing service providers and ecosystem partners;
14. administering contracts and payments;
15. complying with legal obligations;
16. preventing fraud and managing risk;
17. maintaining security;
18. improving technology and services;
19. communicating relevant opportunities, programmes and events; and
20. maintaining corporate and transaction records.

12.2 Categories of data subjects

Data subjects may include:

1. website visitors;
2. prospective and current clients;
3. company representatives;
4. directors;
5. shareholders;
6. investors and prospective investors;
7. capital partners;
8. Facilitators;
9. Professional Associates;
10. employees and contractors;
11. suppliers and service providers;
12. advisers;
13. ecosystem partners;
14. event participants;
15. beneficiaries and stakeholders;
16. counterparties; and
17. members of the public who contact Exco Capital.

12.3 Categories of personal information

Exco Capital may process:

1. identity information;
2. contact information;
3. company and professional information;
4. ownership and directorship information;
5. financial information;
6. investment information;
7. transaction information;
8. due-diligence and compliance information;
9. communication records;
10. contractual information;
11. website and technical data;
12. marketing preferences;
13. employment or contractor information;
14. account and access information;
15. location and jurisdiction information;
16. photographs, audio or video information;

17. special personal information where lawful and necessary; and
18. information concerning alleged or actual unlawful conduct where legally permitted.

12.4 Recipients or categories of recipients

Personal information may be supplied to:

1. authorised Exco Capital personnel;
2. TOM1 operators and technology providers;
3. Facilitators;
4. Professional Associates;
5. ecosystem partners;
6. professional advisers;
7. auditors;
8. legal advisers;
9. accountants;
10. insurers;
11. payment and banking providers;
12. hosting and cloud-service providers;
13. communication and customer-management providers;
14. due-diligence and identity-verification providers;
15. investors and capital partners;
16. authorised prospective counterparties;
17. regulators and public authorities;
18. courts and law-enforcement agencies; and
19. parties involved in a lawful corporate or investment transaction.

Information will be supplied only where a lawful basis exists and subject to appropriate permissions, confidentiality and security requirements.

12.5 Cross-border transfers

Personal information may be transferred to or accessed from countries outside South Africa where:

1. an adequate level of protection applies;
2. the recipient is bound by an appropriate agreement;
3. the transfer is necessary for a contract;
4. the data subject has given informed consent;
5. another lawful ground under POPIA applies; or
6. the information has been properly anonymised or de-identified.

Possible foreign recipients may include cloud providers, technology providers, investors, advisers, Professional Associates, counterparties and ecosystem partners.

12.6 General security measures

Exco Capital applies reasonable technical and organisational security measures, which may include:

1. role-based access controls;
2. password and authentication requirements;
3. encryption where appropriate;
4. secure hosting;
5. backup procedures;
6. confidentiality obligations;
7. operator agreements;
8. system monitoring;
9. security updates;
10. incident-response procedures;
11. access logging;
12. information classification;
13. staff and participant awareness;
14. controlled information-sharing permissions; and
15. review of service providers.

13. How to Request Access to a Record

A requester seeking access to an Exco Capital record must:

1. complete the prescribed **Form 2: Request for Access to Record**;
2. submit the completed form to Exco Capital's Information Officer;
3. provide sufficient detail to identify the requested record;
4. identify the form in which access is required;
5. provide proof of identity;
6. state the right the requester seeks to exercise or protect;
7. explain why the requested record is required for the exercise or protection of that right;
8. identify whether the requester acts personally or on behalf of another person;
9. provide proof of authority when acting for another person; and
10. pay any prescribed request or access fee where applicable.

The prescribed Form 2 is available from the Information Regulator's website.

Requests should be submitted to:

Information Officer: G Botha
Email: support@excocapital.com

Alternatively:

Email: exco@excocapital.com

Physical address:
Thornhill Office Park
84 Bekker Road
Johannesburg
South Africa

14. Proof of Identity and Authority

Exco Capital may require reasonable proof of identity before processing a request.

This may include:

1. a certified identity document or passport;
2. company-registration documents;
3. a resolution or letter of authority;
4. a power of attorney;
5. proof of guardianship, executorship or trusteeship; or
6. another document establishing authority.

Identity documents will be handled in accordance with POPIA and retained only as reasonably necessary.

15. Fees

A requester may be required to pay:

1. the prescribed request fee;
2. access or reproduction fees;
3. search and preparation fees; and
4. postal or delivery costs.

The applicable fees are prescribed by regulation and may change from time to time.

Exco Capital will notify the requester where a fee is payable.

A personal requester seeking access to a record containing their own personal information may be exempt from certain request fees, subject to PAIA and the applicable regulations.

Exco Capital may require payment of a deposit where permitted by PAIA before continuing with substantial search or preparation work.

16. Time Period for Responding

Exco Capital will ordinarily decide a PAIA request within 30 days after receiving a properly completed request and any required fee.

The response period may be extended where permitted by PAIA, including where:

1. a large number of records must be searched;
2. records are held at another location;
3. consultation with another person is necessary;
4. the requester agrees to an extension; or
5. other circumstances recognised by PAIA apply.

The requester will be notified of an extension and the reasons for it.

Failure to respond within the required period may be treated as a refusal under PAIA.

17. Grounds for Refusal

Access may be refused on grounds permitted or required by PAIA, including where disclosure would involve:

1. unreasonable disclosure of a third party's personal information;
2. disclosure of a third party's trade secrets;
3. disclosure of confidential financial, commercial, scientific or technical information;
4. breach of a duty of confidence;
5. endangerment of an individual's life or physical safety;
6. prejudice to the security of property or systems;
7. disclosure of legally privileged material;
8. prejudice to research;
9. disclosure of Exco Capital's trade secrets;
10. disclosure of confidential commercial, financial, technical or strategic information;
11. prejudice to negotiations or commercial activities;

12. disclosure of proprietary TOM1 logic, algorithms, source code, methodologies or intellectual property;
13. disclosure of information supplied under confidentiality restrictions;
14. infringement of copyright;
15. unlawful disclosure under another law; or
16. another ground recognised by PAIA.

Where possible, Exco Capital may grant access to a severable portion of a record while withholding protected information.

18. Mandatory Disclosure in the Public Interest

A record may be disclosed despite a ground for refusal where PAIA requires disclosure in the public interest and the applicable statutory requirements are satisfied.

19. Third-Party Notification

Where a requested record relates to or contains information about a third party, Exco Capital may be required to notify that third party and allow representations before deciding the request.

This may extend the time required to process the request.

20. Form of Access

Subject to availability, legality and reasonable practicality, access may be given by:

1. inspection;
2. a printed copy;
3. an electronic copy;
4. a transcript;
5. listening to an audio record;
6. viewing a visual record; or
7. another form prescribed by law.

Exco Capital may provide access in an alternative form where the requested form would unreasonably interfere with its operations, damage a record, infringe copyright or create an information-security risk.

21. Outcome of a Request

The Information Officer will notify the requester whether:

1. access has been granted;
2. access has been granted in part;
3. access has been refused;
4. a fee is payable;
5. further information is required; or
6. additional time is required.

Where access is refused, the notice will state the relevant reason and available remedies, subject to applicable law.

22. Remedies

A requester dissatisfied with Exco Capital's decision may, subject to PAIA:

1. lodge a complaint with the Information Regulator using prescribed Form 5; or
2. apply to a competent court for appropriate relief.

A complaint to the Information Regulator must ordinarily follow a proper request submitted to Exco Capital and must be made within the period prescribed by law.

There is generally no internal appeal procedure for a private body unless Exco Capital has voluntarily established one.

23. POPIA Requests

A data subject may, subject to POPIA:

1. request confirmation that Exco Capital holds personal information about them;
2. request access to that personal information;
3. request correction or deletion of inaccurate, excessive, irrelevant, outdated, incomplete, misleading or unlawfully obtained information;
4. object to processing on lawful grounds;
5. object to direct marketing;
6. withdraw consent where consent is the applicable basis;

7. request deletion where Exco Capital is no longer authorised to retain the information; and
8. lodge a complaint with the Information Regulator.

Exco Capital may require the prescribed POPIA form or other reasonable written information before processing the request.

24. Updating the Manual

This Manual will be reviewed and updated when reasonably necessary, including when:

1. Exco Capital’s business changes;
2. TOM1 functionality changes;
3. record categories change;
4. Information Officer details change;
5. new legislation or regulations apply;
6. new processing activities are introduced;
7. material cross-border processing changes; or
8. the Information Regulator issues relevant guidance.

25. Approval

This Manual was approved on behalf of Exco Capital (Pty) Ltd.

Name: G Botha
Position: Director and Information Officer

Signature:
Date: 18 July 2026