# PAIA Manual — Flag Finder (Pty) Ltd

Manual in terms of section 51 of the Promotion of Access to Information Act 2 of 2000 ("PAIA"), read with the Protection of Personal Information Act 4 of 2013 ("POPIA")

**Date of compilation:** 2026-07-05 **Date of revision:** 2026-08-21

## 1. Introduction

Flag Finder (Pty) Ltd ("**Flag Finder**", "the **Company**") is a private company registered in South Africa. It owns and operates **StrideNotes** (stridenotes.co.za), a practice management web application for SAVC-registered veterinary physiotherapists.

This manual is published in terms of section 51 of PAIA. It explains what records the Company holds, and the procedure for requesting access to those records. It also includes the processing information required by regulation, in terms of POPIA.

## 2. Company contact details

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|---|---|
| **Registered name** | Flag Finder (Pty) Ltd |
| **Registration number** | 2021/352330/07 |
| **Physical address** | 33 Monument St, Wittedrift, 6603 |
| **Postal address** | 33 Monument St, Wittedrift, 6603 |
| **Telephone** | +27 79 026 5528 |
| **Email** | privacy@stridenotes.com |
| **Website** | https://stridenotes.co.za |

### Head of the private body

Mr D Ponelat Director, Flag Finder (Pty) Ltd

Mr J Ponelat Director, Flag Finder (Pty) Ltd

### Information Officer

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|---|---|
| **Name** | Daniel Ponelat |
| **Email** | privacy@stridenotes.com |

## 3. The Guide in terms of section 10 of PAIA

The Information Regulator has published a Guide, in all official languages, on how to use PAIA. It contains information a requester may need to exercise their rights, including the objects of PAIA and POPIA, contact details of all Information Officers, the manner and form of requests, and available remedies.

The Guide is available:

- from the Information Regulator's website: https://inforegulator.org.za;
- by email request to the Information Regulator; and
- for inspection at the Information Regulator's office (details in section 10 below).

## 4. Records available in terms of other legislation

Records are held by the Company in accordance with, among others, the following legislation:

- Companies Act 71 of 2008
- Income Tax Act 58 of 1962
- Value-Added Tax Act 89 of 1991
- Basic Conditions of Employment Act 75 of 1997 (where applicable)
- Electronic Communications and Transactions Act 25 of 2002
- Protection of Personal Information Act 4 of 2013

- Consumer Protection Act 68 of 2008

## 5. Records automatically available

The following records are freely available without a formal PAIA request:

- content published on https://stridenotes.co.za;
- the StrideNotes Privacy Policy and Terms of Service;
- this PAIA manual; and
- marketing and product information.

## 6. Subjects and categories of records held

| Subject | Categories of records |
|---|---|
| **Company records** | Founding documents, statutory registers, minutes, share register |
| **Financial records** | Accounting records, financial statements, tax records, invoices, banking details |
| **Customer (User) records** | Account and registration details of StrideNotes users, subscription and billing records, support correspondence, integration credentials (e.g. Google account email and encrypted access credential where Google Drive is connected) |
| **Client/practice data (held as operator)** | Client (pet owner) and patient (animal) records entered into StrideNotes by users — held on behalf of users, who are the responsible parties under POPIA |
| **Personnel records (where applicable)** | Employment contracts, remuneration records, contractor agreements |
| **Operational records** | Supplier and service-provider agreements, insurance, correspondence |
| **IT records** | System logs, access logs, backups, product analytics and error/diagnostic records (including session replay recordings), integration connection metadata |

***Note:*** *records held by the Company as an* ***operator*** *on behalf of StrideNotes users are not the Company's records to disclose. Requests relating to a practitioner's client records should be directed to the relevant practitioner as responsible party.*

## 7. Processing of personal information (POPIA — regulation-required disclosure)

### 7.1 Purpose of processing

Personal information is processed to: provide and administer the StrideNotes service; manage user accounts and subscriptions; process payments; deliver transactional email (including SOAP notes and veterinary reports sent on users' instructions); provide AI-assisted dictation and note generation; provide support; monitor the performance and stability of the service and detect, diagnose and fix errors; analyse product usage in order to improve and develop the service; secure the service; and, where a User enables it, copy records to the User's own third-party cloud storage (Google Drive); and comply with legal obligations.

### 7.2 Categories of data subjects and personal information

| Data subjects | Personal information |
|---|---|
| **StrideNotes users (practitioners)** | Name, contact details, SAVC registration number, account credentials, billing and payment records, usage and product analytics data (including in-app activity, device and browser information, error reports and session replay recordings), content created in the app, and (where Google Drive is connected) the Google account email address and an encrypted access credential |
| **Clients of practitioners (pet owners)** | Name, contact details, address, correspondence, records linked to their animals (processed as operator on the practitioner's instructions) |
| **Employees/contractors (where applicable)** | Employment and remuneration records |
| **Suppliers** | Contact and contract details |

*Client personal information and clinical record content are redacted from product analytics and session replay recordings, as described in the StrideNotes Privacy Policy.*

### 7.3 Recipients of personal information

Service providers processing on the Company's behalf: Hetzner (hosting, Germany), Supabase (database, EU-Frankfurt), Resend (email, USA), PostHog (product analytics and error tracking, EU), Anthropic and OpenAI (AI processing, USA), Paystack (payments). Also: regulators and authorities where required by law.

Where a User connects Google Drive, copies of their records are written to that User's own Google account. Google processes this data as the User's own service provider, not as an operator engaged by Flag Finder.

### 7.4 Planned transborder flows

Personal information is transferred to the European Union (hosting, database, and product analytics) and the United States (email delivery and AI processing) under contractual safeguards consistent with section 72 of POPIA.

Where a User enables Google Drive sync, records are stored in that User's own Google account and may be processed outside South Africa in locations determined by Google and the User's account settings, not by Flag Finder. Users are responsible for satisfying themselves that this transfer is lawful and for giving any necessary notice to their Clients.

### 7.5 Security measures

The Company implements appropriate, reasonable technical and organisational safeguards, including encryption in transit and at rest, access controls and role-based permissions, password hashing, logical data separation, backups, access logging, redaction of personal information from diagnostic and analytics records, and contractual confidentiality obligations on all service providers and personnel. Integration credentials (including Google Drive refresh tokens) are encrypted at rest.

## 8. How to request access to records

### 8.1 Procedure

1. Complete **Form 2** (Request for Access to Record), prescribed under the PAIA Regulations, 2021 — available from the Information Regulator's website (https://inforegulator.org.za) or from our Information Officer.

2. Submit the form to the Information Officer at **privacy@stridenotes.com**.

3. Provide sufficient detail to identify the record, the form of access required, and proof of identity. If you act on behalf of another person, provide proof of capacity.

4. If the record contains third-party information, the Company may need to consult that third party before deciding.

### 8.2 Grounds

A requester must identify the right they seek to exercise or protect, and explain why the record is required for that purpose (section 50 of PAIA). **Data subjects requesting their own personal information** need not provide such grounds and pay no request fee.

### 8.3 Decision

The Company will decide on the request within **30 days** of receipt (extendable by up to 30 days in the circumstances permitted by PAIA) and notify the requester of the outcome using the prescribed form, including fees payable and, where access is refused, the reasons and available remedies.

### 8.4 Fees

Fees are prescribed by Annexure B of the PAIA Regulations, 2021 (verify current amounts at https://inforegulator.org.za):

- **Request fee:** R140 (not payable by a person requesting their own personal information);
- **Access/reproduction fees:** per the prescribed tariff (e.g. per-page photocopy/printing fees, electronic copies);
- a deposit may be requested where preparation requires more than the prescribed hours.

### 8.5 Remedies

The Company is a private body; there is no internal appeal procedure. A requester dissatisfied with a decision may:

- lodge a complaint with the **Information Regulator** (details below); or
- apply to a court with appropriate jurisdiction.

## 9. Grounds for refusal

Access may be refused on the grounds set out in Chapter 4 of Part 3 of PAIA, including protection of the privacy of third parties, commercial information of the Company or third parties, confidential information, safety of individuals, legal

privilege, and research information. Mandatory disclosure in the public interest (section 70) applies where relevant.

## 10. Information Regulator contact details

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|---|---|
| **Address** | JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001 |
| **Postal** | P.O. Box 31533, Braamfontein, Johannesburg, 2017 |
| **Email (enquiries)** | enquiries@inforegulator.org.za |
| **Email (PAIA complaints)** | PAIAComplaints@inforegulator.org.za |
| **Email (POPIA complaints)** | POPIAComplaints@inforegulator.org.za |
| **Website** | https://inforegulator.org.za |

## 11. Availability of this manual

This manual is available:

- on the Company's website: https://stridenotes.co.za/paia-manual.pdf;
- from the Information Officer, on request, at privacy@stridenotes.com; and
- for inspection at the Company's registered office during business hours.

## 12. Updating of this manual

The Company will update this manual as and when required by changes to its structure, records, or the law.

**Signed:** 

Mr D Ponelat,
Director / Information Officer Flag Finder (Pty) Ltd
Date: 2026-08-21