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PERSONAL INFORMATION IMPACT ASSESSMENT (PIIA)

POPIA Regulation 4(1)(b) | AI SaaS Platform Portfolio

Ref: GBS-PIIA-AI-2026-001 | **Version:** 2.2 | **Date:** 19 June 2026 **Next Review:** 19 December 2026 (or earlier upon material change) **Assessor:** Head of AI, GBS, Joshua Botha | **Information Officer:** John Botha **Status:** ACTIVE

⚠ DE-IDENTIFICATION — PRIMARY RISK CONTROL

GBS recommends the use of Copilot and other approved de-identification tools (together, the "DeIdentification Tools") to all users of GBS AI tools and chatbot services. Use of one or more of the DeIdentification Tools to deidentify, anonymise, or remove personal or confidential information **before** submitting any query or data to any GBS platform is strongly required. Where any user fails to take reasonable steps to remove personal information or confidential information or, fails to qualitycheck the output of these and other tools, or submits personal or confidential information to any GBS platform without prior scrubbing, GBS is fully and unconditionally indemnified against any and all liability of any nature whatsoever, whether arising now or in the future, in connection with such processing.

This indemnity does not derogate from GBS's commitment to bestpractice POPIA compliance as Operator. This PIIA is maintained to document that commitment — assessing the nature, extent, safeguards, and pertinent information relevant to GBS's role as Operator in the context of users of the SaaS AI platforms and bots it deploys.

Users may use Copilot or other approved de-identification tools to deidentify or anonymise personal or confidential information prior to using our platforms.

1 SECTION 1: PURPOSE AND LEGAL BASIS

This PIIA is prepared pursuant to:

- **POPIA Regulation 4(1)(b):** Information Officers must ensure a PIIA is conducted to verify adequate measures and standards for lawful processing.
- **POPIA section 19:** Responsible parties must identify foreseeable risks and establish appropriate safeguards.
- **Information Regulator Compliance Monitoring (2025/2026):** Organisations must submit a PIIA, incident response plan, risk register, and training proof within 14 Business Days of notification. Fines of up to ZAR 10 million apply. The first fine of ZAR 5 million has been issued. 2,374 breaches were reported in 2024/25 — a 40% year-on-year increase.

2 SECTION 2: PLATFORMS ASSESSED

Platform	Vendor	GBS Use	Subscription Type
MS365 Copilot	Microsoft	HR workflows, productivity	Enterprise (M365)

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Platform	Vendor	GBS Use	Subscription Type
MS Teams	Microsoft	Internal/client communication	Enterprise (M365)
Claude	Anthropic PBC	Core chatbot engine, advisory	Commercial/Enterprise
Voiceflow	Voiceflow Inc.	Chatbot design and deployment	Enterprise
Perplexity	Perplexity AI, Inc.	Research assistance	[Confirm tier]
Gamma.app	Gamma Tech, Inc.	Presentation/document creation	[Confirm tier]
Lovable AI	Lovable Technologies	AI-powered app/web development	[Confirm tier]

3 SECTION 3: RISK TIERING FRAMEWORK

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TIER 1 — LOWER RISK Score: $\leq 1.60/3.0$ overall and $\leq 1.5/3.0$ breach | DPA confirmed | Sub-processors disclosed | No model training confirmed | Enterprise-grade certifications **Permitted:** General PI  | Special PI  with controls and pseudonymisation **Controls:** Standard data minimisation; enterprise subscription; PPS usage enforced; staff training

TIER 2 — MODERATE RISK Score: $1.61-2.25/3.0$ overall or $1.5-2.0/3.0$ breach | DPA requires negotiation | Sub-processors partially disclosed | Model training status uncertain **Permitted:** General PI  (with documented justification) | Special PI  **PROHIBITED Cross-border:** Permitted only after POPIA s72 binding agreement concluded **Controls:** Enhanced minimisation; special PI prohibition; s72 mechanism to be negotiated; enhanced training

TIER 3 — HIGHER RISK Score: $> 2.25/3.0$ overall or material compliance gaps **Permitted:** Anonymised/pseudonymised content only  | Personal information of any kind  **PROHIBITED Controls:** Immediate remediation required before any personal data use; bespoke POPIA MSA to be negotiated; SOC 2 scope to be verified

5 SECTION 4: PLATFORM RISK TIER REGISTER

Platform	Overall Score	Breach Score	Risk Tier	Review Due
MS Teams	1.28/3.0	1.0/3.0	Tier 1 — Lower Risk	Feb 2027
MS365 Copilot	1.32/3.0	1.0/3.0	Tier 1 — Lower Risk	Feb 2027
Claude	1.48/3.0	1.2/3.0	Tier 1 — Lower Risk	Feb 2027
Voiceflow	1.52/3.0	1.2/3.0	Tier 1–2 — Lower-Medium	Feb 2027
Perplexity	2.24/3.0	2.2/3.0	Tier 2 — Moderate Risk 	Aug 2026
Gamma.app	2.48/3.0	2.2/3.0	Tier 3 — Higher Risk 	Aug 2026
Lovable AI	2.36/3.0	2.2/3.0	Tier 3 — Higher Risk 	Aug 2026



6 SECTION 5: 25-ITEM ASSESSMENT HEATMAP

#	Item	Copilot	Teams	Claude	Voiceflow	Perplexity	Gamma	Lovable AI
1	Lawful Basis	1	1	1	1	2	2	2
2	Purpose Specification	1	1	1	1	2	3	2
3	Data Minimisation	1	1	1	2	2	3	3
4	Special PI Handling	1	1	2	2	3	3	3
5	Role Classification	1	1	1	1	2	2	2
6	DPA in Place	1	1	1	1	2	3	3
7	Sub-Processors Disclosed	1	1	2	2	3	3	3
8	Cross-Border Transfers	1	1	2	2	3	3	3
9	Hosting Location	1	1	2	2	3	3	3
10	Model Training	1	1	1	1	2	2	2
11	Data Retention	1	1	1	1	2	2	2
12	Logging & Audit	1	1	1	1	2	2	2
13	Encryption	1	1	1	1	2	2	2
14	Access Control	1	1	1	1	2	2	2
15	Breach Notification	1	1	1	1	2	2	2
16	PIIA Coverage	2	2	2	2	2	3	3
17	Automated Decision-Making	2	1	2	2	2	2	2
18	Hallucination Risk	2	2	2	2	2	2	2
19	Bias Risk	2	2	2	2	2	2	2
20	Prompt Injection Risk	2	2	2	2	2	3	3
21	Training & AUP	2	2	2	2	2	2	2
22	Client Disclosure	2	2	2	2	3	3	3
23	Data Subject Rights	1	1	1	1	2	2	2
24	Data Deletion on Exit	1	1	1	1	2	3	3
25	Vendor Risk Register	2	2	2	2	3	3	3
Overall Score		1.32	1.28	1.48	1.52	2.24	2.48	2.36

1 = Low | 2 = Medium | 3 = High

7 SECTION 6: VENDOR RISK REGISTER

Microsoft Corporation (Copilot + Teams) — Tier 1

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Primary Risk: SA data residency must be actively configured (not automatic). **Status:** Enterprise DPA in place; SA residency available; Purview configuration outstanding. **Outstanding Actions:** Configure SA tenant data residency; configure Purview DLP and sensitivity labels. **Owner/Deadline:** Head of AI — 30 March 2026 | **Certs:** SOC 2, ISO 27001, ISO 42001, HIPAA

Anthropic PBC (Claude) — Tier 1

Primary Risk: US-based hosting; no platform-level block on special PI input; Consumer plan enables training. **Status:** Enterprise DPA confirmed; training prohibition confirmed; 48h breach notification confirmed; ZDR available. **Outstanding Actions:** Confirm Commercial/Enterprise plan for all users; negotiate POPIA s72 addendum; activate staff usage policy for special PI; consider ZDR. **Owner/Deadline:** Head of AI + Legal — 30 March 2026 | **Certs:** SOC 2, ISO 27001, ISO 42001, HIPAA-ready

Voiceflow Inc. — Tier 1–2

Primary Risk: Canadian hosting (cross-border); sub-processor list not public; chatbot flow design drives risk. **Status:** DPA in place; GDPR-aligned. **Outstanding Actions:** Request full sub-processor list; conclude POPIA s72 agreement; review chatbot flows for minimisation. **Owner/Deadline:** Head of AI — 30 April 2026 | **Certs:** SOC 2

Perplexity AI, Inc. — Tier 2 ⚠️

Primary Risk: No POPIA-specific DPA; US-only hosting; no s72 transfer mechanism; sub-processor list unavailable. **Current Status:** COMPLIANCE GAP — no POPIA-compliant DPA in place. **Current Restriction:** No personal information permitted. Anonymised queries only. **Outstanding Actions:** Negotiate POPIA-aligned enterprise DPA incorporating s72 provisions; obtain sub-processor list; confirm training opt-out. **Owner/Deadline:** Head of AI + Legal — 14 March 2026 (URGENT) | **Certs:** SOC 2

Gamma Tech, Inc. (Gamma.app) — Tier 3 ●

Primary Risk: No POPIA DPA; terms grant extensive IP rights over client content; severe breach liability limitations; US-only hosting; disputed SOC 2 scope; multiple undisclosed AI sub-processors. **Current Status:** CRITICAL COMPLIANCE GAP — use with personal information is non-compliant with POPIA. **Current Restriction:** Strictly prohibited for personal information of any kind. **Anonymised/pseudonymised non-personal content only.** **Outstanding Actions:** Issue immediate staff restriction notice; evaluate viability of POPIA-compliant MSA negotiation; verify SOC 2 scope. **Owner/Deadline:** Joint CEOs + Legal — 7 March 2026 (CRITICAL)

Lovable Technologies (Lovable AI) — Tier 3 ●

Primary Risk: No POPIA-specific DPA confirmed; US-based hosting; sub-processor list not publicly disclosed; terms grant broad rights over user-submitted content and generated outputs; model training opt-out status unconfirmed; no documented s72 cross-border transfer mechanism; SOC 2 certification status unverified; prompt injection risk elevated due to code-generation and live deployment capabilities. **Current Status:** CRITICAL COMPLIANCE GAP — no POPIA-compliant DPA in place; use with personal

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information is non-compliant with POPIA. **Current Restriction:** Strictly prohibited for personal information of any kind. **Anonymised/pseudonymised non-personal content only. No client or employee data to be included in prompts or generated application logic. Outstanding Actions:** Issue immediate staff restriction notice; obtain and review full terms of service and privacy policy; evaluate viability of POPIA-compliant MSA negotiation; obtain sub-processor list; confirm model training opt-out; verify SOC 2 scope and certification status; conclude POPIA s72 addendum before any personal data use is permitted.

Owner/Deadline: Joint CEOs + Legal — 7 March 2026 (CRITICAL)

8 SECTION 7: CROSS-CUTTING RISKS AND CONTROLS

7.1 PPS and De-identification — Primary Control

Basis: POPIA ss 3(2), 10, 19; DPA clause 3. **Rule:** All users must run all text through the PPS before submission to any GBS platform. Failure to do so triggers the GBS indemnity (DPA clause 3.3) and constitutes a breach of the Client's contractual obligations. **De-identification hierarchy:** Anonymised (preferred) → Pseudonymised (acceptable) → Identified (exceptional, Tier 1 only, documented necessity). **Residual Risk:** Medium — technical enforcement not possible; relies on user compliance, training, and interface prompting. **Mitigation:** DPA contractual obligation; privacy notice warnings; staff training; GBS audit right over interaction logs.

7.2 Automated Decision-Making (POPIA s71)

Risk: AI outputs used without human review for consequential employment decisions. **Control:** GBS Services are decision-support tools only. All consequential decisions require qualified human review. DPA clause 5.2; privacy notice disclosure; interface labelling. **Residual Risk:** Medium — dependent on client behaviour post-delivery.

7.3 Hallucination and Information Quality (POPIA s16)

Risk: AI-generated content may be inaccurate and used in HR/legal decisions. **Control:** Subject matter expert review of critical outputs; output disclaimers; client training. **Residual Risk:** Medium — inherent to all LLM systems; cannot be eliminated.

7.4 Prompt Injection (POPIA s19)

Risk: Malicious or inadvertent inputs cause AI platforms to expose other data subjects' information. **Control:** Claude and M365 Copilot include built-in protections; Voiceflow bots reviewed pre-deployment; Gamma.app confirmed phishing abuse incident — personal data prohibited; Lovable AI code-generation and live deployment capabilities elevate prompt injection and data exfiltration risk — personal data prohibited.

Residual Risk: Medium (Tier 1); High (Gamma.app and Lovable AI — mitigated by prohibition on personal data).

7.5 Training and Awareness (POPIA s19(2))

Regulatory requirement: Information Regulator requires proof of POPIA training sessions. **Required actions:** Platform-specific POPIA AI training; PPS usage training; special PI restrictions per tier; human review obligations; Consumer vs Enterprise plan distinctions. Records to be maintained and available for Regulator submission.

9 SECTION 8: PRIORITY ACTION PLAN

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Priority	Action	Owner	Deadline
● Critical	Staff notice: Gamma.app restricted to non-personal content	Head of AI	7 March 2026
● Critical	Staff notice: Perplexity restricted to anonymised queries	Head of AI	7 March 2026
● Critical	Staff notice: Lovable AI restricted to non-personal content	Head of AI	7 March 2026
● Critical	Commence Perplexity POPIA enterprise DPA negotiation	Legal + Head of AI	14 March 2026
● Critical	Evaluate Gamma.app — negotiate POPIA MSA or discontinue PI use	Joint CEOs + Legal	14 March 2026
● Critical	Evaluate Lovable AI — review terms, negotiate POPIA MSA or discontinue PI use	Joint CEOs + Legal	14 March 2026
● High	Confirm Commercial/Enterprise Claude plan for all GBS users	Head of AI	30 March 2026
● High	Negotiate POPIA s72 addenda — Anthropic and Voiceflow	Legal	30 March 2026
● High	Configure SA data residency for M365 tenant	Head of AI + IT	30 March 2026
● High	Configure Microsoft Purview DLP and sensitivity labels	Head of AI + IT	30 March 2026
● Medium	Execute client DPAs with Sub-Processor Schedule	Legal	30 April 2026
● Medium	Deploy PPS to all users; conduct PPS and POPIA training	Head of AI + IO	30 April 2026
● Medium	Request Voiceflow and Perplexity sub-processor lists	Head of AI	30 April 2026
● Medium	Obtain Lovable AI sub-processor list; confirm SOC 2 and training opt-out status	Head of AI	30 April 2026
● Ongoing	Annual PIIA review	Information Officer	Feb 2027
● Ongoing	Monitor Information Regulator AI guidance	Legal	Quarterly

10 SECTION 9: CERTIFICATION

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I certify this PIIA reflects GBS's AI platform portfolio as at the assessment date and has been conducted in accordance with POPIA Regulation 4(1)(b).

Head of AI: Signature _____ Date **_01/03/2026 Information Officer:**

Signature _____ Date _____ **Joint CEO:** Signature _____ Date _____

*Next mandatory review: 24 February 2027, or **upon:** material platform terms change; new platform addition; Security Compromise; material change in Regulator guidance.*

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