

PAIA AND POPIA MANUAL

This manual was prepared in accordance with section 51 of the Promotion of Access to Information Act, 2000 and to address requirements of the Protection of Personal Information Act, 2013.

This manual applies to

Knight Street Properties

(PTY) LTD

Registration number: 1993/001534/07/

t/a Paxton Hotel (PH)

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1. Background to the Promotion of Access to Information Act

- 1.1. The Promotion of Access to Information Act, No. 2 of 2000 (“PAIA”) was enacted on 3 February 2000, giving effect to the constitutional right in terms of section 32 of the Bill of Rights contained in the Constitution of the Republic of South Africa 108 of 1996 (the “Constitution”) of access to any information held by the state and any information that is held by another person and that is required for the exercise or protection of any rights.
- 1.2. In terms of section 51 of PAIA, all non-governmental entities are required to compile an Information Manual (“PAIA Manual”).
- 1.3. Where a request is made in terms of PAIA, the entity to whom the request is made is obliged to release the information, subject to the applicable legislative and / or regulatory requirements of PAIA.

2. Knight Street Properties (Pty) Ltd, t/a Paxton Hotel (PH) (“Paxton Hotel (PH)”/“We”/“the Company”)

- 2.1. Knight Street Properties (Pty) Ltd operates as a hotel and self-catering apartments in South Africa. It is a privately owned Company in accordance with the company laws of the Republic of South Africa and has built a reputation for providing high quality, value for money accommodation and conferencing facilities at our hotel.
- 2.2. This PAIA Manual is available at the Company registered office: The Paxton Hotel, Corner Beach & Carnarvon Place, Gqeberha (formally known as Port Elizabeth), South Africa, as well as on the Company’s website: www.paxton.co.za
- 2.3. Knight Street Properties (Pty) Ltd comprises the following companies:
 - Knight Street Properties (Pty) Ltd - **t/a Paxton Hotel (PH)**

This PAIA Manual applies to all the aforementioned South African entities, both jointly and severally, and such entities are referred as Paxton Hotel (PH).

3. Purpose of the PAIA Manual

- 3.1. The purpose of PAIA is to promote the right of access to information, to foster a culture of transparency and accountability within Paxton Hotel (PH) by giving the right to information that is required for the exercise or protection of any right and to actively promote a society in which the people of South Africa have effective access to information to enable them to exercise and protect their rights.
- 3.2. In order to promote effective governance of non-governmental entities, it is necessary to ensure that everyone is empowered and educated to understand their rights in terms of PAIA.
- 3.3. Section 9 of PAIA recognises that the right to access information cannot be unlimited and should be subject to justifiable limitations, including, but not limited to:
- 3.3.1. limitations aimed at the reasonable protection of privacy;
 - 3.3.2. commercial confidentiality; and
 - 3.3.3. effective, efficient and good governance;
- and in a manner which balances that right with any other rights, including such rights contained in the Bill of Rights in the Constitution.
- 3.4. This PAIA Manual complies with the requirements of the guide mentioned in section 10 of PAIA and recognises that upon commencement of the Protection of Personal Information Act 4 of 2013 (“POPIA”), that the appointed Information Regulator will be responsible to regulate compliance with PAIA and its regulations by private and public bodies.
- 3.5. Capitalised terms used in this PAIA Manual bear the same definition used in PAIA and POPIA.

4. Contact Details of the Chief Executive Officer [Section 51(1)(a)]

Managing Director :	Werner Peterseil
Registered Address:	The Paxton Hotel, Corner Beach and Carnarvon Place, Gqeberha (formally known as Port Elizabeth), South Africa
Postal Address:	P O Box 13737, Humeral, 6013
Telephone Number:	+27 (0) 41 585-9655
Website:	www.paxton.co.za

5. The Information Officer [Section 51(1)(b)]

- 5.1. Knight Street Properties has opted to appoint an Information Officer, registered with the Information Regulator, to assess requests for access to information as well as to oversee its required functions, duties and responsibilities in terms of PAIA and POPIA.
- 5.2. The Information Officer may appoint, where it is deemed necessary, Deputy Information Officers, as allowed in terms of section 17 of the Act as well as section 56 of POPIA. This is in order to render Paxton Hotel (PH) as accessible as reasonably possible for requesters of its records and to ensure fulfilment of its obligations and responsibilities as prescribed in terms of section 55 of POPIA. All requests for information in terms of PAIA and / or POPIA must be addressed to the Information Officer.

Contact Details of the Information Officer

Information Officer:	Werner Peterseil
Physical Address:	The Paxton Hotel, Corner Beach and Carnarvon Place, Gqeberha (formally known as Port Elizabeth), South Africa
Postal Address:	P O Box 13737, Humewood, Gqeberha, 6013
Telephone Number:	+27 (0) 41 585-9655
Email:	private@paxton.co.za

6. Guide of SA Human Rights Commission (Section 51(1) (b))

- 6.1. PAIA grants a requester access to the records of a private entity, if the record is required for the exercise or protection of any rights.
- 6.2. Requests in terms of PAIA must be made in accordance with the prescribed procedures, at the rates provided. The forms and tariff are dealt with in paragraphs 14 and 15 and the Appendices of the Manual.
- 6.3. Requesters are referred to the Guide in terms of Section 10 of PAIA which has been compiled by the South African Human Rights Commission, which will contain information for the purposes of exercising Constitutional Rights. The Guide is available from the SAHRC.
- 6.4. The contact details of the Commission are:

Contact body:	The South African Human Rights Commission
Physical Address	PAIA Unit 29 Princess of Wales Terrace Cnr York and Andrew Street Parktown, Johannesburg
Postal Address:	Private Bag 2700, Houghton 2041
Telephone Number:	+27 11 877 3600
E-Mail:	PAIA@sahrc.org.za
Web Site:	www.sahrc.org.za

7. Automatic Disclosure – Categories of Records Available Without Having To Request Access (Section 51(1)(c) in terms of PAIA)

7.1 The web page www.paxton.co.za is accessible to anyone who has access to the Internet. The Paxton Hotel (PH) website hosts the following categories of information:

- Hotel Information
 - Rates
 - Reservations
 - Contact Details
 - Location Maps
 - Hotel Amenities and Services Offered
- Corporate Information
 - Corporate Profile
 - Annual Financial Statements and Interim Reports
 - Memorandum of Incorporation
 - BEE Industry Scorecard
- Legal
 - General Terms of Use
 - Privacy Policy
 - POPI and PAIA Manual
 - Terms of Residence
 - Covid-19 Protocols (temp)
- Other Information
 - Specials and Promotions
 - Product and Promotional Brochures/Pamphlets
 - News and Marketing Information
 - Partners
 - Social Media Links
 - Other literature intended for public viewing

7.2 Other non-confidential records, such as statutory records maintained at CIPC, may also be accessed without the need to submit a formal application, however, please note that an appointment to view such records will still have to be made with the Information Officer.

8. Subjects and Categories of Records Available only on Request to Access in Terms of PAIA (Section 51(1) (e))

8.1. Records held by Paxton Hotel

For the purposes of this clause 8.1, “Personnel” refers to any person who works for, or provides services to, or on behalf of Paxton Hotel (PH) and receives or is entitled to receive remuneration and any other person who assists in carrying out or conducting the business of Paxton Hotel. This includes, without limitation, directors (executive and non-executive), all permanent, temporary and part-time staff, as well as contract workers.

This clause serves as a reference to the categories of information that Paxton Hotel (PH) holds. The information is classified and grouped according to records relating to the following subjects and categories:

SUBJECT	CATEGORY
Companies Act and Statutory Records	<ul style="list-style-type: none"> • All trust deeds; • Documents of Incorporation; • Index of names of Directors, • Memorandum of Incorporation; • Minutes of meetings of the Board of Directors; • Minutes of meetings of Shareholders; • Resolutions / Special resolutions passed by the Board of Directors and Shareholders meetings; • Statutory Registers; • Annual Reports; • Annual Returns; • Intellectual Property; • Licences; • Health and Safety Records.
Financial Records	<ul style="list-style-type: none"> • Annual Audited Financial Statements; • Asset Registers; • Bank Statements; • Banking details and bank accounts;

	<ul style="list-style-type: none"> • Banking Records; • Debtors / Creditors statements and invoices; • General ledgers and subsidiary ledgers; • General reconciliation; • Invoices; • Paid Cheques; • Financial Policies and procedures; • Instalment Purchase Agreements;
Tax Records	<ul style="list-style-type: none"> • PAYE Records; • Documents issued to employees for income tax purposes; Records of payments made to SARS on behalf of employees; • VAT Returns; • Skills Development Levies; • UIF; • Workmen's Compensation; • Tax Returns;
Human Resources: Personnel Documents And Records	<ul style="list-style-type: none"> • IR Disciplinary Code and Records; • Employee benefits, arrangements, rules and records; • Employment Contracts; • Employment Equity Plan Forms and Applications; • Grievance Procedures and hearings including CCMA Records; • HR Policies and Procedures; • Leave Records; • Medical Aid Records; • Payroll reports/ Wage register; • Rewards and Incentive Scheme Rules; • Safety, Health and Environmental Records; • Salary Records; • SETA records • Skills Development Plan and Report; • Standard letters and notices; • Training Manuals; • Training Records; • Workplace and Union agreements and negotiation records; • Accident books and records; • Address and contact detail Lists;
Retirement Fund	<ul style="list-style-type: none"> • Provident Fund Rules; • Correspondence; • Statutory Records and Returns;
Sales and Marketing	<ul style="list-style-type: none"> • Advertising and promotional material; • Customer (including guest) records; • Credit application information; • Information and records provided by a third party; • Marketing material and media releases: brochures, newsletters and general notices; • Statements of Account; • Terms and Conditions of Residence;

	<ul style="list-style-type: none"> • Guest Registration Card;
Risk Management and Audit	<ul style="list-style-type: none"> • Audit reports; • Risk management frameworks; • Risk management plans;
Safety, Health and Environment	<ul style="list-style-type: none"> • Complete Safety, Health and Environment Risk Assessment Environmental Managements Plans; • Inquiries, inspections, examinations by health, safety and environmental authorities;
Information Technology	<ul style="list-style-type: none"> • Disaster recovery plans; • Hardware asset registers; • Information security policies/standards/procedures; • Information technology systems and user manuals; • Information technology user policy documentation; • Project implementation plans; • Software and licences; • System documentation and manuals; • Operating Systems;
Corporate Social Responsibility (CSR) and Enterprise Development	<ul style="list-style-type: none"> • CSR schedule of projects/record of organisations that receive funding, inclusive of donations and sponsorships; • Reports, books, publications and general information related to CSR spend; • Records and contracts of agreement with funded organisations;
Assets	<ul style="list-style-type: none"> • Land and Building Register; • Fixed Asset Register; • Title Deeds; • Leases;
Procurement	<ul style="list-style-type: none"> • Standard Terms and Conditions for supply of services and products; • Contractor, client and supplier agreements; • Lists of suppliers, products, services and distribution; • Policies and Procedures.
Insurance	<ul style="list-style-type: none"> • Insurance policies • Claim Records
Operational Information	<ul style="list-style-type: none"> • This information can be defined as information needed in the day-to-day running of the organisation. Examples of such information include, but are not limited to, internal telephone lists, address lists, company policies, company procedures, human resources policies and procedures, administration manual, industry related statistical data, guest database, historical guest histories, guest reservation data, management information reports, property development information such construction contracts and architectural drawings.

8.2. Note that the accessibility of the records may be subject to the grounds of refusal set out in this PAIA Manual. Amongst other, records deemed confidential on the part of a third party, will necessitate written consent from the third party concerned, in addition to normal requirements, before Paxton Hotel (PH) will consider access.

9. Description of the Records of the Body which are Available in Accordance with any other Legislation (Section 51(1) (d))

9.1. Where applicable to its operations, Paxton Hotel (PH) also retains records and documents in terms of the legislation below. Unless disclosure is prohibited in terms of legislation, regulations, contractual agreement or otherwise, records that are required to be made available in terms of these acts shall be made available for inspection by interested parties in terms of the requirements and conditions of PAIA; the below mentioned legislation and Paxton Hotel (PH) applicable internal policies and procedures, should such interested parties be entitled to such information. A request to access must be done in accordance with the requirements of PAIA.

- Basic Conditions of Employment Act, No 75 of 1997;
- Broad- Based Black Economic Empowerment Act, No 75 of 1997;
- Businesses Act, No 71 of 1991;
- Companies Act, No 71 of 2008;
- Compensation for Occupational Injuries & Diseases Act, 130 of 1993;
- Competition Act, No.71 of 2008;
- Constitution of the Republic of South Africa 2008;
- Consumer Protection Act, 2008;
- Copyright Act, No 98 of 1978;
- Deeds Registries Act, 1937
- Electronic Communications Act, No 36 of 2005;
- Electronic Communications and Transactions Act, No 25 of 2002;
- Employment Equity Act, No 55 of 1998;
- Financial Intelligence Centre Act, No 38 of 2001;
- Financial Markets Act, 2012
- Foodstuffs, Cosmetics and Disinfectants Act, 1972
- Harmful Business Practices Act, 1999
- Immigration Act, No. 13 of 2002;
- Income Tax Act, No 58 of 1962;
- Intellectual Property Laws Amendment Act, No 38 of 1997;
- Labour Relations Act, No 66 of 1995;

- Long Term Insurance Act, No 52 of 1998;
- Medical Schemes Act, 1956
- National Liquor Act, No 59 of 2003 and Liquor legislation for the various provinces and related By-laws;
- Occupational Health & Safety Act, No 85 of 1993;
- Pension Funds Act, No 24 of 1956;
- Prescription Act, No 68 of 1969;
- Prevention of Organised Crime Act, No 121 of 1998;
- Promotion of Access to Information Act, No 2 of 2000;
- Protected Disclosures Act, No. 26 of 2000;
- Protection of Personal Information Act, No. 4 of 2013;
- Regulation of Interception of Communications and Provision of Communication-Related Information Act 70 of 2002;
- Skills Development Levies Act, No. 9 of 1999;
- Short-term Insurance Act No. 53 of 1998;
- Trademarks Act, 1993
- Trust Property Control Act 57 of 1988;
- Unemployment Insurance Contributions Act 4 of 2002;
- Value Added Tax Act 89 of 1991;
- *Although we have used our best endeavours to supply a list of applicable legislation, it is possible that this list may be incomplete. Whenever it comes to our attention that existing or new legislation allows a Requester access on a basis other than as set out in PAIA, we shall update the list accordingly. If a Requester believes that a right of access to a record exists in terms of other legislation listed above or any other legislation, the Requester is required to indicate what legislative right the request is based on, to allow the Information Officer the opportunity of considering the request in light thereof.*

9.2. It is further recorded that the accessibility of documents and records may be subject to the grounds of refusal set out in this PAIA Manual.

10. Detail to Facilitate a Request for Access to a Record of Paxton Hotel (Section 51(1) (e))

- 10.1. The requester must comply with all the procedural requirements contained in PAIA relating to the request for access to a record.
- 10.2. The requester must complete the prescribed form attached as Appendix 1, and submit same as well as payment of a request fee and a deposit (if applicable) to the Information Officer at the postal, physical address or electronic mail address as noted in clause 5 above.

- 10.3. The prescribed form must be filled in with sufficient information to enable the Information Officer to identify:
 - a. the record or records requested; and
 - b. the identity of the requester.
- 10.4. The requester should indicate which form of access is required and specify a postal address or e-mail address of the requester in the Republic;
- 10.5. The requester must state that he/she requires the information in order to exercise or protect a right, and clearly state what the nature of the right is so to be exercised or protected. The requester must clearly specify why the record is necessary to exercise or protect such a right (section 53(2)(d)).
- 10.6. Paxton Hotel (PH) will process the request within 30 (thirty) days, unless the requester has stated special reasons to the satisfaction of the Information Officer that circumstances dictate that the above time periods not be complied with.
- 10.7. The requester shall be advised whether access is granted or denied in writing. If, in addition, the requester requires the reasons for the decision in any other manner, the requester will be obliged to state which manner and the particulars required.
- 10.8. If a request is made on behalf of another person, then the requester must submit proof of the capacity in which the requester is making the request to the reasonable satisfaction of the Information Officer (section 53(2)(f)).
- 10.9. If an individual is unable to complete the prescribed form because of illiteracy or disability, such a person may make the request orally.
- 10.10. The requester must pay the prescribed fee, before any further processing can take place.
- 10.11. All information as listed in clause 10 herein should be provided, failing which the process will be delayed until the required information is provided. The prescribed time periods will not commence until the requester has furnished all the necessary and required information. The Information Officer shall sever a record, if possible, and grant only access to that portion requested and which is not prohibited from being disclosed.

11. Refusal of Access to Records

11.1. Grounds to Refuse Access

A private body such as Paxton Hotel (PH) is entitled to refuse a request for information.

11.1.1. The main grounds for Paxton Hotel (PH) to refuse a request for information relates to the:

- a. mandatory protection of the privacy of a third party who is a natural person or a deceased person (section 63) or a juristic person, as included in POPIA, which would involve the unreasonable disclosure of personal information of that natural or juristic person;

- b. mandatory protection of personal information and for disclosure of any personal information to, in addition to any other legislative, regulatory or contractual agreement, comply with the provisions of POPIA;
 - c. mandatory protection of the commercial information of a third party (section 64) if the record contains:
 - i. trade secrets of the third party;
 - ii. financial, commercial, scientific or technical information which disclosure could likely cause harm to the financial or commercial interests of that third party;
 - iii. information disclosed in confidence by a third party to the Paxton Hotel, if the disclosure could put that third party at a disadvantage in negotiations or commercial competition;
 - d. mandatory protection of confidential information of third parties (section 65) if it is protected in terms of any agreement;
 - e. mandatory protection of the safety of individuals and the protection of property (section 66); and
 - f. mandatory protection of records which would be regarded as privileged in legal proceedings(section 67).
- 11.1.2. The commercial activities (section 68) of a private body, such as Paxton Hotel (PH), which may include:
- a. trade secrets of Paxton Hotel (PH);
 - b. financial, commercial, scientific or technical information which disclosure could likely cause harm to the financial or commercial interests of Paxton Hotel (PH);
 - c. information which, if disclosed could put Paxton Hotel (PH) at a disadvantage in negotiations or commercial competition;
 - d. a computer program which is owned by Paxton Hotel (PH), and which is protected by copyright;
 - e. the research information (section 69) of Paxton Hotel (PH) or a third party, if its disclosure would disclose the identity of Paxton Hotel (PH), the researcher or the subject matter of the research and would place the research at a serious disadvantage;
- 11.1.3. Requests for information that are clearly frivolous or vexatious, or which involve an unreasonable diversion of resources shall be refused.
- 11.1.4. All requests for information will be assessed on their own merits and in accordance with the applicable legal principles and legislation.
- 11.1.5. If a requested record cannot be found or if the record does not exist, the Information

Officer shall, by way of an affidavit or affirmation, notify the requester that it is not possible to give access to the requested record. Such a notice will be regarded as a decision to refuse a request for access to the record concerned for the purpose of PAIA. If the record should later be found, the requester shall be given access to the record in the manner stipulated by the requester in the prescribed form, unless the Information Officer refuses access to such record.

12. Remedies Available When Paxton Hotel (PH) Refuses a Request

12.1. Internal Remedies

Paxton Hotel (PH) does not have internal appeal procedures. The decision made by the Information Officer is final. Requesters will have to exercise such external remedies at their disposal if the request for information is refused, and the requestor is not satisfied with the answer supplied by the Information Officer.

12.2. External Remedies

12.2.1. A requestor that is dissatisfied with the Information Officer's refusal to disclose information, may within 30 (thirty) days of notification of the decision, apply to a Court for relief.

12.2.2. A third party dissatisfied with the Information Officer's decision to grant a request for information, may within 30 (thirty) days of notification of the decision, apply to a Court for relief.

12.2.3. For purposes of PAIA, the Courts that have jurisdiction over these applications are the Constitutional Court, the High Court or another court of similar status and a Magistrate's Court designated by the Minister of Justice and Constitutional Development and which is presided over by a designated Magistrate.

13. Access to Records Held by Paxton Hotel (PH)

13.1. Prerequisites for Access by Personal/Other Requester

13.1.1. Records held by Paxton Hotel (PH) may be accessed by requests only once the prerequisite requirements for access have been met.

13.1.2. A requester is any person making a request for access to a record of Paxton Hotel. There are two types of requesters:

a. **Personal Requester**

- i. A personal requester is a requester who is seeking access to a record containing personal information about the requester.
- ii. Paxton Hotel (PH) will voluntarily provide the requested information, or give access to any record with regard to the requester's personal information. The prescribed fee for reproduction of the information requested will be charged.

b. **Other Requester**

- i. This requester (other than a personal requester) is entitled to request access to information of third parties.
- ii. In considering such a request, Paxton Hotel (PH) will adhere to the provisions of both PAIA and POPIA. Section 71 requires that the Information Officer take all reasonable steps to inform a third party to whom the requested record relates of the request, informing him/her that he/she may make a written or oral representation to the Information Officer why the request should be refused or, where required, give written consent for the disclosure of the information.

Paxton Hotel (PH) is not obliged to voluntarily grant access to such records. The requester must fulfil the requirements of PAIA as stipulated in Chapter 5; Part 3, including the payment of a request and access fee.

14. Prescribed Fees (Section 51 (1) (f))

14.1. Fees Provided by PAIA

14.1.1. PAIA provides for two types of fees, namely:

- a. A request fee, which is a form of administration fee to be paid by all requesters except personal requesters, before the request is considered and is not refundable; and
- b. An access fee, which is paid by all requesters in the event that a request for access is granted. This fee is inclusive of costs involved by the private body in obtaining and preparing a record for delivery to the requester.

- 14.1.2. When the request is received by the Information Officer, such officer shall by notice require the requester, other than a personal requester, to pay the prescribed request fee, before further processing of the request (section 54(1)).
- 14.1.3. If the search for the record has been made and the preparation of the record for disclosure, including arrangement to make it available in the requested form, requires more than the hours prescribed in the regulations for this purpose, the Information Officer shall notify the requester to pay as a deposit the prescribed portion of the access fee which would be payable if the request is granted.
- 14.1.4. The Information Officer shall withhold a record until the requester has paid the fees as indicated below.
- 14.1.5. A requester whose request for access to a record has been granted, must pay an access fee that is calculated to include, where applicable, the request fee, the process fee for reproduction and for search and preparation, and for any time reasonably required in excess of the prescribed hours to search for and prepare the record for disclosure including making arrangements to make it available in the requested form.
- 14.1.6. If a deposit has been paid in respect of a request for access, which is refused, then the Information Officer concerned must repay the deposit to the requester.

15. Other Fees

15.1. Reproduction Fee

Where Paxton Hotel (PH) has voluntarily provided the Minister with a list of categories of records that will automatically be made available to any person requesting access thereto, the only charge that may be levied for obtaining such records, will be a fee for reproduction of the record in question.

Reproduction of Information Fees	Fees to be Charged
Information in an A4 size page photocopy or part thereof	R1,10
A printed copy of an A4 size page or part thereof	R0,75
A copy in computer readable format, for example: USB stick	R250
A transcription of visual images, in an A4 size page or part thereof	R40
A copy of visual images	R60
A transcription of an audio record for an A4 sized page or part thereof	R20
A copy of an audio record	R30

15.2. Request Fees

Where a requester submits a request for access to information held by an institution on a person other than the requester himself/herself, a request fee in the amount of R50.00 (fifty Rand) is payable upfront before the institution will further process the request received.

15.3. Access Fees

15.3.1. An access fee is payable in all instances where a request for access to information is granted, except in those instances where payment of an access fee is specially excluded in terms of the Act or an exclusion is determined by the Minister in terms of section 54(8).

The applicable access fees which will be payable are:

Access of Information Fees	Fees to be Charged
Information in an A4 size page photocopy or part thereof	R1,10
A printed copy of an A4 size page or part thereof	R0,75
A copy in computer readable format, for example: USB stick	R250
Compact disc (if available)	R70
A transcription of visual images, in an A4 size page or part thereof	R40
A copy of visual images	R60
A transcription of an audio record for an A4 sized page or part thereof	R20
A copy of an audio record	R30*
*Per hour or part of an hour reasonably required for such search	
Where a copy of a record needs to be posted, the actual postal fee is payable.	

15.4. Deposits

15.4.1. Where Paxton Hotel (PH) receives a request for access to information held on a person other than the requester himself/herself and the Information Officer upon receipt of the request is of the opinion that the preparation of the required record of disclosure will take more than 6 (six) hours, a deposit is payable by the requester.

15.4.2. The amount of the deposit is equal to 50% (fifty percent) of the amount of the applicable access fee.

15.5. **Collection Fees**

- 15.5.1. The initial "request fee" of R50.00 (fifty Rand) should be deposited into the bank account below and a copy of the deposit slip, application form and other correspondence / documents, forwarded to the Information Officer via e-mail.
- 15.5.2. The officer will collect the initial "request fee" of applications received directly by the Information Officer via email.
- 15.5.3. All fees are subject to change as allowed for in the Act and as a consequence such escalations may not always be immediately available at the time of the request being made. Requesters shall be informed of any changes in the fees prior to making a payment.

16. **Decision**

16.1. Time Allowed to Institution

- 16.1.1. Paxton Hotel (PH) will, within 30 (thirty) days of receipt of the request, decide whether to grant or decline the request and give notice with reasons (if required) to that effect.
- 16.1.2. The 30 (thirty) day period within which Paxton Hotel (PH) has to decide whether to grant or refuse the request, may be extended for a further period of not more than (30) thirty days if the request is for a large amount of information, or the request requires a search for information held at another office of Paxton Hotel (PH) and the information cannot reasonably be obtained within the original 30 (thirty) day period.
- 16.1.3. Paxton Hotel (PH) will notify the requester in writing should an extension be sought.

17. **Protection of Personal Information that is Processed by Paxton Hotel (PH)**

- 17.1. Chapter 3 of POPIA provides for the minimum Conditions for Lawful Processing of Personal Information by a Responsible Party. These conditions may not be deviated from unless specific exclusions apply as outlined in POPIA.
- 17.2. Paxton Hotel (PH) needs Personal Information relating to both individual and juristic persons in order to carry out its business and organisational functions. The manner in which this information is Processed and the purpose for which it is Processed is determined by Paxton Hotel. Paxton Hotel (PH) is accordingly a Responsible Party for the purposes of POPIA and will ensure that the Personal Information of a Data Subject:

- 17.2.1. is processed lawfully, fairly and transparently. This includes the provision of appropriate information to Data Subjects when their data is collected by Paxton Hotel, in the form of privacy or data collection notices. Paxton Hotel (PH) must also have a legal basis (for example, consent) to process Personal Information;
 - 17.2.2. is processed only for the purposes for which it was collected;
 - 17.2.3. will not be processed for a further purpose unless that processing is compatible with the original purpose.
 - 17.2.4. is adequate, relevant and not excessive for the purposes for which it was collected;
 - 17.2.5. is accurate and kept up to date;
 - 17.2.6. will not be kept for longer than necessary;
 - 17.2.7. is processed in accordance with integrity and confidentiality principles;
 - 17.2.8. is safeguarded which includes physical and organisational measures to ensure that Personal Information, in both physical and electronic form, are subject to an appropriate level of security when stored, used and communicated by Paxton Hotel (PH), in order to protect against access and acquisition by unauthorised persons and accidental loss, destruction or damage;
 - 17.2.9. is processed in accordance with the rights of Data Subjects, where applicable.
- 17.3. **Data Subjects have the right to:**
- 17.3.1. be notified that their Personal Information is being collected by Paxton Hotel. The Data Subject also has the right to be notified in the event of a data breach;
 - 17.3.2. know whether Paxton Hotel (PH) holds Personal Information about them, and to access that information. Any request for information must be handled in accordance with the provisions of this PAIA Manual;
 - 17.3.3. request the correction or deletion of inaccurate, irrelevant, excessive, out of date, incomplete, misleading or unlawfully obtained personal information;
 - 17.3.4. object to Paxton Hotel (PH) use of their Personal Information and request the deletion of such Personal Information (deletion would be subject to Paxton Hotel's record keeping requirements);
 - 17.3.5. object to the processing of Personal Information for purposes of direct marketing by means of unsolicited electronic communications; and
 - 17.3.6. complain to the Information Regulator regarding an alleged infringement of any of the rights protected under POPIA and to institute civil proceedings regarding the alleged non-compliance with the protection of his, her or its personal information.

17.4. Purpose of the Processing of Personal Information by the Company

As outlined above, Personal Information may only be processed for a specific purpose. The purposes for which Paxton Hotel (PH) processes or will process Personal Information is set out in Part 1 of Appendix 2.

17.5. Categories of Data Subjects and Personal Information / Special Personal Information relating thereto

As per section 1 of POPIA, a Data Subject may either be a natural or a juristic person. Part 2 of Appendix 2 sets out the various categories of Data Subjects in terms of which Paxton Hotel (PH) Processes Personal Information and the types of Personal Information relating thereto.

17.6. Recipients of Personal Information

Part 3 of Appendix 2 outlines the recipients to whom Paxton Hotel (PH) may provide a Data Subject's Personal Information.

17.7. Cross-border flows of Personal Information

17.7.1. Section 72 of POPIA provides that Personal Information may only be transferred out of the Republic of South Africa if the:

- a. recipient country can offer such data an "adequate level" of protection. This means that its data privacy laws must be substantially similar to the Conditions for Lawful Processing as contained in POPIA; or
- b. Data Subject consents to the transfer of their Personal Information; or
- c. transfer is necessary for the performance of a contractual obligation between the Data Subject and the Responsible Party; or
- d. transfer is necessary for the performance of a contractual obligation between the Responsible Party and a third party, in the interests of the Data Subject; or
- e. the transfer is for the benefit of the Data Subject, and it is not reasonably practicable to obtain the consent of the Data Subject, and if it were, the Data Subject, would in all likelihood provide such consent.

17.7.2. Part 4 of Appendix 2 sets out the cross-border transfers of Personal Information which Paxton Hotel (PH) requires and the conditions applicable thereto.

17.8. Description of information security measures to be implemented by Paxton Hotel (PH)

Part 5 of Appendix 2 sets out the types of security measures implemented by Paxton Hotel (PH) in order to ensure that Personal Information is respected and protected. A preliminary assessment of the suitability of the information security measures implemented or to be implemented by Paxton Hotel (PH) may be conducted in order to ensure that the Personal Information that is processed by Paxton Hotel (PH) is safeguarded and Processed in accordance with the Conditions for Lawful Processing.

17.9. Objection to the Processing of Personal Information by a Data Subject

Section 11 (3) of POPIA and regulation 2 of the POPIA Regulations provides that a Data Subject may, at any time object to the Processing of his/her/its Personal Information in the prescribed form attached to this PAIA Manual as Appendix 3 subject to exceptions contained in POPIA.

17.10. Request for correction or deletion of Personal Information

Section 24 of POPIA and regulation 3 of the POPIA Regulations provides that a Data Subject may request for their Personal Information to be corrected/deleted in the prescribed form attached as Appendix 4 to this PAIA Manual

18. Availability and Updating of the PAIA Manual

- 18.1.1. Paxton Hotel (PH) will update this PAIA Manual at such intervals as may be deemed necessary by PAIA, POPIA or any other applicable law;
- 18.1.2. This PAIA Manual of Paxton Hotel (PH) is available to view at its premises and on its website www.paxton.co.za.



REPUBLIC OF SOUTH AFRICA FORM C
REQUEST FOR ACCESS TO RECORD OF PRIVATE BODY

(Section 53(1) of the Promotion of Access to Information Act, 2000 (Act No. 2 of 2000))[Regulation 10]

A. Particulars of the private body: The Information Officer

B. Particulars of person requesting access to the record

- (a) The particulars of the person who requests access to the record must be given below.
 - (b) The address and/or fax number in the Republic to which the information is to be sent must be given.
 - (c) Proof of the capacity in which the request is made, if applicable, must be attached.

Full names and surname:													
Identity number:													
Postal address:													
Telephone number:	()
E-mail address:													

Capacity in which request is made, when made on behalf of another person:

--

C. Particulars of person on whose behalf request is made

This section must be completed ONLY if a request for information is made on behalf of another person
--

Full names and surname:													
Identity number:													

D. Particulars of record

<p>(a) Provide full particulars of the record to which access is requested, including the reference number if that is known to you, to enable the record to be located.</p> <p>(b) If the provided space is inadequate, please continue on a separate folio and attach it to this form. The requester must sign all the additional folios.</p>
--

1. Description of record or relevant part of the record:

--

2. Reference number, if available:

3. Any further particulars of record:

E. Fees

- (a) A request for access to a record, other than a record containing personal information about yourself, will be processed only after a request fee has been paid.
 - (b) You will be notified of the amount required to be paid as the request fee.
 - (c) The fee payable for access to a record depends on the form in which access is required and the reasonable time required to search for and prepare a record.
 - (d) If you qualify for exemption of the payment of any fee, please state the reason for exemption.

Reason for exemption from payment of fees:

F. Form of access to record

If you are prevented by a disability to read, view or listen to the record in the form of access provided for in 1 to 4 below, state your disability and indicate in which form the record is required.

Disability:		Form in which record is required:	
Mark the appropriate box with an X.			

NOTES:

- (a) Compliance with your request for access in the specified form may depend on the form in which the record is available.
- (b) Access in the form requested may be refused in certain circumstances. In such a case you will be informed if access will be granted in another form.
- (c) The fee payable for access to the record, if any, will be determined partly by the form in which access is requested.

1. If the record is in written or printed form:					
	copy of record*		inspection of record		
2. If record consists of visual images - (this includes photographs, slides, video recordings, computer-generated images, sketches, etc.):					
	view the images		copy of the images*		transcription of the images*
3. If record consists of recorded words or information which can be reproduced in sound:					
	listen to the soundtrack (audio cassette)		transcription of soundtrack* (written or printed document)		
4. If record is held on computer or in an electronic or machine-readable form:					
	printed copy of record*		printed copy of information derived from the record*		copy in computer readable form* (stiffy or compact disc)

*If you requested a copy or transcription of a record (above), do you wish the copy or transcription to be posted to you? Postage is payable.	Yes	No
---	-----	----

G. Particulars of right to be exercised or protected

If the provided space is inadequate, please continue on a separate folio and attach it to this form.
The requester must sign all the additional folios.

1. Indicate which right is to be exercised or protected:

2. Explain why the record requested is required for the exercise or protection of the aforementioned right:

H. Notice of decision regarding request for access

You will be notified in writing whether your request has been approved / denied. If you wish to be informed in another manner, please specify the manner and provide the necessary particulars to enable compliance with your request.

How would you prefer to be informed of the decision regarding your request for access to the record?

Signed at on this day of 20.....

.....

Signature of Requester/Person on Whose Behalf Request is Made

APPENDIX 1: PART 2 – FEES PAYABLE

FOR OFFICE USE ONLY	
REQUEST REFERENCE NO.	
DATE OF RECEIPT OF REQUEST	

Requestor Information:

Full names and surname:												
Identity number:												
Postal address:												
Telephone number:	()
E-mail address:												

1. **PAIA Manual fee:** The Fee for a copy of the PAIA Manual is R1,10 for every photocopy of an A4 page or part thereof.
2. **Reproduction Fees:** for the reproduction of a record requested:

Reproduction of Information Fees	Fees to be Charged
Information in an A4 size page photocopy or part thereof	R1,10
A printed copy of an A4 size page or part thereof	R0,75
A copy in computer readable format, for example: USB stick	R250
A transcription of visual images, in an A4 size page or part thereof	R40
A copy of visual images	R60
A transcription of an audio record for an A4 sized page or part thereof	R20
A copy of an audio record	R30

3. **Request Fee:** Where a requester submits a request for access to information held by an institution on a person other than the requester himself/herself, a request fee in the amount of R50.00 (fifty Rand) is payable up-front.

4. **Access Fees:** The applicable access fees which will be payable are:

Access of Information Fees	Fees to be Charged
Information in an A4 size page photocopy or part thereof	R1,10
A printed copy of an A4 size page or part thereof	R0,75
A copy in computer readable format, for example: USB stick	R250
Compact disc (if available)	R70
A transcription of visual images, in an A4 size page or part thereof	R40
A copy of visual images	R60
A transcription of an audio record for an A4 sized page or part thereof	R20
A copy of an audio record	R30*
*Per hour or part of an hour reasonably required for such search	
Where a copy of a record needs to be posted, the actual postal fee is payable.	

5. **Deposits:** Where Paxton Hotel (PH) receives a request for access to information held on a person other than the requester himself/herself and the Information Officer upon receipt of the request is of the opinion that the preparation of the required record of disclosure will take more than 6 (six) hours, a deposit of 30% of the applicable access fee is payable by the requester.

I agree to make payment of the amount as invoiced by Paxton Hotel (PH) in accordance with the aforementioned fee schedule.

Signed at on this day of 20.....

.....

Signature of Requester/Person on Whose Behalf Request is Made

APPENDIX 2: PART 1 – PROCESSING OF PERSONAL INFORMATION IN ACCORDANCE WITH POPIA

For clients

- a. Making hotel reservations for clients.
- b. Report to Immigration Services in accordance with Immigration Act.
- c. Performing duties in terms of any agreement with clients.
- d. Make, or assist in making, credit decisions about clients.
- e. Operate and manage clients' accounts and manage any application, agreement or correspondence clients may have with Paxton Hotel (PH).
- f. Communicating (including direct marketing) with clients by email, SMS, letter, telephone or in any other way about Paxton Hotel (PH) products and services, promotions and competitions, unless clients indicate otherwise.
- g. To form a view of clients as individuals and to identify, develop or improve products that may be of interest to clients.
- h. Carrying out market research, business and statistical analysis.
- i. Performing other administrative and operational purposes including the testing of systems.
- j. Recovering any debt clients may owe to Paxton Hotel (PH).
- k. Complying with Paxton Hotel's regulatory and other obligations inclusive of the Immigration Act, The Consumer Protection Act and the National Credit Act.
- l. Any other reasonably required purpose relating to the Paxton Hotel (PH) business.

For prospective clients

- a. Making hotel reservations.
- b. Verifying and updating information.
- c. Pre-credit scoring.
- d. Direct marketing.
- e. Communicating (including direct marketing) with clients by email, SMS, letter, telephone or in any other way about Paxton Hotel's products and services, promotions and competitions, unless clients indicate otherwise.
- f. Any other reasonably required purpose relating to the processing of a prospect's personal information reasonably related to the Paxton Hotel's business.

For employees

- a. The same purposes as for clients (above).
- b. Verification of applicant employees' information during recruitment process.
- c. General matters relating to employees:
 - i. Provident Fund
 - ii. Medical aid
 - iii. Payroll
 - iv. Disciplinary action
 - v. Training
- d. Any other reasonably required purpose relating to the employment or possible employment relationship.

For vendors /suppliers /other businesses

- a. Verifying information and performing checks.
- b. Purposes relating to the agreement or business relationship or potential agreement or business relationships between the Parties.
- c. Payment of invoices.
- d. Complying with the Paxton Hotel's regulatory and other obligations; and
- e. Any other reasonably required purpose relating to the Paxton Hotel (PH) business.

And in relation to the aforementioned any legitimate interest of Paxton Hotel (PH) as is detailed in the Paxton Hotel's Privacy Policy published on its websites : www.paxton.co.za .

APPENDIX 2: PART 2 - CATEGORIES OF DATA SUBJECTS AND CATEGORIES OF PERSONAL INFORMATION RELATING THERETO

Employees

- a. Name and contact details.
- b. Identity number and identity documents including passports.
- c. Employment history and references.
- d. Banking and financial details.
- e. Details of payments to third parties (deductions from salary).
- f. Employment contracts.
- g. Employment equity plans.
- h. Medical aid records.
- i. Provident Fund records.
- j. Remuneration/salary records.
- k. Performance appraisals.
- l. Disciplinary records.
- m. Leave records.
- n. Training records.

Clients and prospective clients (which may include employees and prospective employees)

- a. Postal and/or street address.
- b. Title and name.
- c. Contact numbers and/or e-mail address.
- d. Nationality.
- e. Identity document, birth certificate or passport.
- f. Financial information.
- g. Browsing habits and click patterns on Paxton Hotel (PH) websites as per the Paxton Hotel (PH) Privacy and Cookie Policy.
- h. Responses to Surveys and Competitions an Promotions
- i. Customer comments and service reviews

Vendors /suppliers / other businesses

- a. Name, address and contact details.
- b. Identity and legal entity details and applicable statutory information.
- c. Banking and financial information.
- d. Information about products or services.
- e. Browsing habits and click patterns on Paxton Hotel (PH) websites as per the Paxton Hotel (PH) Privacy and Cookie Policy.
- f. Other information not specified, reasonably required to be processed for business operations.

6. APPENDIX 2: PART 3 - RECIPIENTS OF PERSONAL INFORMATION

- a. Any firm, organisation or person that Paxton Hotel (PH) uses to collect payments and recover debts or to provide a service on its behalf
- b. Any firm, organisation or person that/who provides Paxton Hotel (PH) with products and services
- c. Any payment system Paxton Hotel (PH) uses;
- d. Regulatory and governmental authorities or ombudsmen, or other authorities, including immigration and tax authorities, where Paxton Hotel (PH) has a duty to share information;
- e. Third parties to whom payments are made on behalf of employees;
- f. Financial institutions from whom payments are received on behalf of data subjects;
- g. Any other Operator not specified;
- h. Employees, contractors and temporary staff; and
- i. Agents.

7. APPENDIX 2: PART 4 – CROSS BORDER TRANSFERS OF PERSONAL INFORMATION

Personal Information may be transmitted trans-border to affiliates of Paxton Hotel (PH) service providers in other countries, and Personal Information may be stored in data servers hosted outside South Africa, which may not have adequate data protection laws. Paxton Hotel (PH) will endeavour to ensure that its dealers and service providers will make all reasonable efforts to secure the data and Personal Information.

Paxton Hotel (PH) will transfer Personal Information outside South Africa in the following circumstances:

1. a client reservation is with a Paxton Hotel (PH) located internationally;
2. where Paxton Hotel (PH) is required to make contact on behalf of client outside South Africa;
3. where electronic services and resources are based outside South Africa for example banking and credit card payment services;
4. where there is an international element to a reservation.

Paxton Hotel (PH) will take steps to ensure that, wherever possible, the transfer complies with POPIA and endeavour to ensure that our host providers are subject to laws, or policies, which uphold principles for the reasonable processing of information substantially similar to the POPIA to ensure adequate protection of Personal Information.

For further information please contact the Information Officer.

8. APPENDIX 2: PART 5 – DESCRIPTION OF INFORMATION SECURITY MEASURES

Paxton Hotel (PH) undertakes to institute and maintain the data protection measures to accomplish the following objectives outlined below. The details given are to be interpreted as examples of how to achieve an adequate data protection level for each objective. Paxton Hotel (PH) may use alternative measures and adapt to technological security development, as needed, provided that the objectives are achieved.

1. Access Control of Persons

Paxton Hotel (PH) shall implement suitable measures in order to prevent unauthorized persons from gaining access to the data processing equipment where the data are processed.

2. Data Media Control

Paxton Hotel (PH) undertakes to implement suitable measures to prevent the unauthorized manipulation of media, including reading, copying, alteration or removal of the data media used by Paxton Hotel (PH) and containing personal data of Customers.

3. Access Control to Data

Paxton Hotel (PH) represents that the persons entitled to use Paxton Hotel's data processing system are only able to access the data within the scope and to the extent covered by their respective access permissions (authorisation).

4. Transmission Control

Paxton Hotel (PH) shall be obliged to enable the verification and tracing of the locations/destinations to which the personal information is transferred by utilization of the Paxton Hotel's data communication equipment/devices.

5. Transport Control

Paxton Hotel (PH) shall implement suitable measures to prevent Personal Information from being read, copied, altered or deleted by unauthorized persons during the transmission thereof or during the transport of the data media.

6. Organisation Control

Paxton Hotel (PH) shall maintain its internal organisation in a manner that meets the requirements of this Manual.

APPENDIX 3: OBJECTION TO THE PROCESSING OF PERSONAL INFORMATION IN TERMS OF SECTION 11(3) OF THE PROTECTION OF PERSONAL INFORMATION ACT, 2013

REGULATIONS IN RESPECT OF THE PROTECTION OF PERSONAL INFORMATION ACT, 2018

[Regulation 2]

Note:

- 1 Affidavits or other documentary evidence as applicable in support of the objection may be attached.
- 2 If the space provided for in this Form is inadequate, submit information as an Annexure to this Form and sign each page.
- 3 Complete as is applicable

A.	DETAILS OF DATA SUBJECT
Name(s) and surname/ registered name of data subject:	
Unique Identifier/ Identity Number	
Residential, postal or business address:	
Contact number(s):	
Fax number / E-mail address:	
B.	DETAILS OF RESPONSIBLE PARTY
Name(s) and surname/ registered name of data subject:	
Residential, postal or business address:	
Contact number(s):	
Fax number / E-mail address:	
C.	REASONS FOR OBJECTION IN TERMS OF SECTION 11(1)(d) to (f) (Please provide detailed reasons for the objection)

Signed at on this day of 20.....

.....
Signature of Data Subject/Designated Person

APPENDIX 4: REQUEST FOR CORRECTION OR DELETION OF PERSONAL INFORMATION OR DESTROYING OR DELETION OF RECORD OF PERSONAL INFORMATION IN TERMS OF SECTION 24(1) OF THE PROTECTION OF PERSONAL INFORMATION ACT, 2013

REGULATIONS RELATING TO THE PROTECTION OF PERSONAL INFORMATION, 2018

[Regulation 3]

Note:

1. Affidavits or other documentary evidence as applicable in support of the request may be attached.
2. If the space provided for in this Form is inadequate, submit information as an Annexure to this Form and sign each page.
3. Complete as is applicable.

Mark the appropriate box with an "x" .Request for:

Correction or deletion of the personal information about the data subject which is in possession or under the control of the responsible party.

Destroying or deletion of a record of personal information about the data subject which is in possession or under the control of the responsible party and who is no longer authorised to retain the record of information.

A. DETAILS OF DATA SUBJECT	
Name(s) and surname/ registered name of data subject:	
Unique Identifier/ Identity Number	
Residential, postal or business address:	
Contact number(s):	
Fax number / E-mail address:	
B. DETAILS OF RESPONSIBLE PARTY	
Name(s) and surname/ registered name of data subject:	
Residential, postal or business address:	
Contact number(s):	

Fax number / E-mail address:	
C. Reasons for Objection in Terms of Section 11(1)(D) to (F) (Please Provide Detailed Reasons for The Objection)	
D. Reasons for *Correction or Deletion of the Personal Information about the Data Subject in Terms of Section 24(1)(a) which is in Possession or Under the Control of the Responsible Party; and or Reasons for Destruction or Deletion of a Record of Personal Information about the Data Subject in Terms of Section 24(1)(b) which the Responsible Party is no longer Authorised to Retain. (Please Provide Detailed Reasons for the Request)	

Signed at on this day of 20.....

.....
Signature of Data Subject/Designated Person