

# **TRAVELSTART GROUP OF COMPANIES (“Travelstart”)**

## **S51 Promotion of Access to Information Act Manual (“PAIA”)**

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## Preamble.

Section 51 of the Promotion of Access to Information Act No.2 of 2000, (“the Act”), as amended by the Protection of Personal Information Act no. 4 of 2013 (“POPIA”) requires that Travelstart Online Travel Operations (Pty) Ltd, together with its subsidiaries (hereinafter referred to collectively as “Travelstart” or as the context may indicate), as a private body must compile a manual giving information to the public regarding the procedure to be followed in requesting information from Travelstart for the purpose of exercising or protecting your rights of access to Information and Privacy as enshrined in the Constitution of the Republic of South Africa.

## Introduction.

Travelstart, including its Subsidiaries, conduct their operations in compliance with all legal and regulatory requirements. Therefore, this manual is aimed at ensuring that:

- Travelstart Online Travel Operations (Pty) Ltd
- Travelstart Group of Companies, which shall include:
- Travellab Group Services (Pty) Ltd
- Glyde Payments (Pty) Ltd
- Safari Now.com (Pty) Ltd
- Club Travel SA (Pty) Ltd
- Club Corporate SA (Pty) Ltd
- NexCT Travel (Pty) Ltd
- Club Corporate Manco (Pty) Ltd
- Flightsite (Pty) Ltd
- Journey to Day 1 (Pty) Ltd
- Innovation City Cape Town (Pty) Ltd

Complies with:

- Section 51 of the Act as well as POPIA;
- It provides requirements on how to request for information and records from Travelstart;
- It provides the process and forms for which requests for information must be submitted;  
and
- It stipulates the grounds on which a request for information or a record may be refused.

This Manual may be updated from time-to-time. The most up to date version of the Manual will be made available free of charge to the Public on Travelstart websites and a PDF copy can also be inspected at the offices of Travelstart situated at Darter Studios, Longkloof, Darters Road, Gardens, Cape Town, during normal business hours (Monday to Friday 08:00 – 17:00 excluding public holidays as may be gazetted from time to time by the South African Government.

## Company Details.

### **Name of Private Body:**

- Travelstart Group of Companies, which shall include:
- Travelstart Online Travel Operations (Pty) Ltd
- Travellab Group Services (Pty) Ltd

- Glyde Payments (Pty) Ltd
- Safari Now.com (Pty) Ltd
- Club Travel SA (Pty) Ltd
- Club Corporate SA (Pty) Ltd
- NexCT Travel (Pty) Ltd
- Club Corporate Manco (Pty) Ltd
- Flightsite (Pty) Ltd
- Journey to Day 1 (Pty) Ltd
- Innovation City Cape Town (Pty) Ltd

**Physical Address** : Darter Studios, Longkloof, Darters Road, Gardens, Cape Town, South Africa, 8001

**Postal Address** : As above

**Head of Body** : Stephan Ekberg

**Information Officer** : Anthony Streak

**Electronic Mail** : io@travelstart.com

**Telephone Number** : (021) 468 4300

## The official Guide.

A guide on how to use the Act has been compiled in terms of section 10 of the Act and can be viewed on the Information Regulator website. Kindly be advised that the transfer of functions from the South African Human Rights Commissioner to the Information Regulator became effective as at 30 June 2021.

Any queries can be directed to:

- The Information Regulator (South Africa)  
JD house, 27 Stiemens Street, Braamfontein, Johannesburg, 2001  
PO Box 31533, Braamfontein, Johannesburg, 2017  
Website: <https://www.justice.gov.za/infoereg/index.html>  
Email : <https://www.justice.gov.za/infoereg/index.html>

## Availability of this Manual and changes made.

This Manual is available from the designated Information Officer, whose details appear in the section above entitled "Contact Details", for public inspection:

- at the physical address of Travelstart, free of charge;
- on the Travelstart website (www.travelstart.com), free of charge; or
- on request by any person (along with payment of a prescribed fee)

As provided for in terms of section 51(2) of the Act, this Manual will be updated as and when needed and the latest version of the Manual will be made public through the Travelstart web-site: www.travelstart.com.

## Processing Personal Information.

Travelstart is an online travel booking website, offering flights, hotel bookings, car rental, vacation packages and other travel services through our online booking engine (Travelstart website).

Through the aforementioned booking website, Travelstart is able to collect information (which is made up of Personal information) and which Personal Information is protected in accordance with POPIA. Such Personal Information Includes, Full Name, contact details (Phone and Email), Identity Number and Bank details (where applicable).

Travelstart collects Personal Information, where it has obtained the consent of the person through Travelstart's website terms and conditions, from the person to whom has authority to share or where such information belongs to such person and where:

- Processing complies with the obligations imposed on Travelstart by law;
- Travelstart has a legitimate requirement to process such information; or
- Travelstart meets its responsibilities to its Suppliers, employees and other natural or juristic persons.

Travelstart may disclose Personal information lawfully to:

- Any regulatory authority (as prescribed by overarching legislation) and the regulators they appoint for the various sectors;
- To a third-party travel Provider, provided that this is limited to use only for the purpose for which the Data Subject has provided their consent and where such sharing of Personal Information is a requirement for Travelstart in order to perform our end of the services required by The Data Subject.
- Comply with any regulation passed under the relevant legislation, or any legal process (which may be introduced from time-to-time);
- To protect a legitimate public interest; or
- Providing to our legal advisors or similar service providers with the appropriate undertakings to protect the information.

The information held by Travelstart has been divided into different categories grouped into various subjects, each of which describes a subset of data information collected and held. The categories of information are not exhaustive but are merely meant to give a broad indication of the information subject and categories held by Travelstart, without specification. A category may therefore contain sub-categories and sub-sets of information, which may not be specifically listed.

Travelstart is committed to developing appropriate safeguards to make sure that Personal Information is kept secure and confidential and is protected against reasonably anticipated threats to its security or integrity, and against unauthorised access or use that might result in harm or inconvenience to data subjects.

Description of Data Subjects (person on which Travelstart holds records and categories of such record):

Categories of Data Subjects and personal information processed by Travelstart include the following:

<u>Subject</u>	<u>Personal Information Processed</u>
Finance	<ul style="list-style-type: none"> <li>• Bank statements;</li> <li>• A list of company's debtors and creditors;</li> <li>• Budgets per department;</li> <li>• Management Accounts;</li> <li>• Asset Register;</li> <li>• Invoices;</li> <li>• Salaries;</li> <li>• Audited annual Financial Statements;</li> <li>• Tax Returns;</li> <li>• Account records and dealings;</li> <li>• Banking Records (including bank statements);</li> <li>• Customer details, VAT number, delivery address, email address and employer details;</li> <li>• Stock Records</li> <li>• Tax Records (employee and Company)</li> </ul>
Human Resources	<ul style="list-style-type: none"> <li>• Pay-as-you-earn (PAYE) records;</li> <li>• Documents issued to employees for tax purposes;</li> <li>• Records of payment made to the South African Reserve Bank;</li> <li>• Any and all Statutory requirements;</li> <li>• Value Added Tax;</li> <li>• Skills Development Levies;</li> <li>• Unemployment Insurance Fund;</li> <li>• Employment contracts;</li> <li>• Disciplinary records;</li> <li>• Salary records;</li> <li>• SETA records;</li> <li>• Disciplinary code;</li> <li>• Leave records;</li> <li>• Training records;</li> <li>• Training Manuals;</li> <li>• Employee Identity Numbers;</li> <li>• Employee addresses;</li> </ul>

	<ul style="list-style-type: none"> <li>• Employee names (as well as emergency contact details);</li> <li>• Staff administration (employee records and information);</li> <li>• Staff includes potential and existing staff;</li> <li>• Information relating to Health and Safety of employees;</li> <li>• Performance Appraisals</li> <li>• Personnel Guidelines, Policies and Procedures</li> <li>• Remuneration Records and Policies</li> <li>• Staff Recruitment Policies</li> <li>• Training Records</li> </ul>
<p>Customers and third Party's Data</p>	<ul style="list-style-type: none"> <li>• Copies of compliance certification (registration Number, Registered Address, Directors and Shareholders)</li> <li>• Emergency Planning and Operational data</li> <li>• Environmental plans</li> <li>• Physical Security plans and contracts</li> <li>• Transport and Delivery Plans</li> <li>• Copies of Insurance and Public Liability Insurances</li> <li>• Client company/trading details-vat numbers, company registration details etc.</li> <li>• Client and 3rd party professional qualifications and professional body registration details</li> <li>• Supplier contracts and supplier contact details</li> <li>• Customer contracts and customer details</li> <li>• Details regarding the rendering of services according to instructions given by clients</li> <li>• Compliance with tax laws of third parties</li> <li>• Marketing and Future Strategies</li> <li>• Marketing Records</li> <li>• Production Records</li> <li>• Sales Records</li> <li>• Suppliers Registry</li> <li>• Insurance Information</li> </ul>

	<ul style="list-style-type: none"><li>• Internal Audit Records</li><li>• IT Policies and Procedures</li><li>• Network Diagrams</li><li>• User Manuals</li></ul>
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## How to request access to a record.

All records shall only be made available subject to the provisions of the Act.

### Form Request:

- When making a request to access a record, the requestor must use the prescribed forms:
  - Making a request: [Please Click Here](#)
  - Outcome of Request and Fees Payable: [Please Click Here](#)
- The requestor must provide sufficient detail on the request form in order to allow Travelstart to identify both the requestor and the requested document.
- The requester must identify the right that is sought to be exercised or protected and provide an explanation of why the requested record is required for the exercise or protection of that right.
- If a request is being made on behalf of another person, the requester must submit proof of the capacity in which the requester is making the request as well as confirmation that he/she is duly authorised to act in such capacity.

### Time Periods:

- Travelstart will inform the requester 30 days after receipt of the request of its decision whether or not to grant the request.
- The 30-day period may be extended by a further period of not more than 30 days if the request is for a large number of records or requires a search through a large number of records and compliance with the original period would unreasonably interfere with the activities of Travelstart or the records are not located at Travelstart, or consultations amongst divisions and/or subsidiaries of Travelstart or another private body are required.

### Fees:

- A requester who seeks access to a record containing personal information about the requester is not required to pay the request fee.
- Where fees are payable these are detailed in the request form.
- If the request is granted, a further fee will be payable for the search, preparation, and reproduction of the record.
- The requester may lodge an application to the court against the tender or payment of the request fee or may lodge a complaint with the Information Regulator.



## Grounds for Refusal.

Apart from Section 7 of the Act, and subject to Section 70 of the Act, the main grounds for Travelstart to refuse a request for information as contemplated by the Act relates to:

- The protection of the privacy of a third party, if that third party is a natural person, which would involve the unreasonable disclosure of personal information of that natural person (Section 63(1)), for which such person would require the prior informed consent of the third party;
- Protection of commercial information of a third party as defined by the Act, if the record contains: trade secrets of that third party; financial, commercial, scientific or technical information other than trade secrets of a third party, the disclosure of which would be likely to cause harm to the commercial or financial interests of that third party; information disclosed in confidence to Travelstart by a third party, the disclosure of which could put that third party at a disadvantage in contractual or other negotiations or would prejudice that third party in commercial competition (Section 64).
- Protection of confidential information if the disclosure would constitute a breach of a duty or confidence to a third party in terms of an agreement (Section 65);
- Protection of safety of individuals and protection of property (Section 66);
- Protection of records which would be regarded as privileged in any legal proceedings, unless the person so entitled to privilege waives the privilege (Section 67);
- Protection of commercial activities of Travelstart, which includes:
  - trade secrets of Travelstart; financial, commercial, scientific or technical information, disclosure of which could cause harm to the financial or commercial interests of Travelstart; information which, if disclosed, could put Travelstart at a disadvantage in negotiations or commercial competition; a computer programme owned by Travelstart, and which is protected by copyright (Section 68);
- The research information of Travelstart or a third party on behalf of Travelstart if the disclosure would expose the third party, Travelstart, the researcher or the subject matter of the research to serious disadvantage (Section 69).
- The requester must pay the prescribed fee (if applicable) before any further processing can take place.

## Outcome of request for Information.

- Should a request be granted, the notice will state the access fee (if any) to be paid upon access, the form in which access will be given and further that the requester may lodge an application with a Court against the access fee to be paid or the form of access granted, and the procedure for lodging such application.
- Should the request be refused, the notice will state adequate reasons for the refusal, including the provisions of the Act relied upon; and that the requester may lodge an application with a Court against the refusal of the request, and the procedure (including the time period) for lodging the application.

## Remedies available for refusal.

- Travelstart does not have internal appeal procedures and as such, the decision made by the Information Officer is final.
- Should the requester be dissatisfied with the Information Officer's decision to refuse access, that person may within 30 days after notification of the refusal apply to a Court for the appropriate relief.
- Should a third party be dissatisfied with the Information Officer's decision to grant a request for information relating to that third party, it (the third party) may within 30 days of notification of such decision, apply to a Court for the appropriate relief.

## Prescribed Fees.

No.	Description	Fee in Rands
1	The fee for a copy of the manual as contemplated in regulation 9(2)(c) for every photocopy of an A4-size page or part thereof	1,10
2	The fees for reproduction referred to in regulation 11(1) are as follows:	
	(a) For every photocopy of an A4-size page or part thereof	1,10
	(b) For every printed copy of an A4-size page or part thereof held on a computer or in electronic or machine-readable form	0,75
	(c) For a copy in a computer-readable form on –	
	(i) stiffy disc 7,50	7,50
	(ii) compact disc	70,00
	(d) (i) For a transcription of visual images, for an A4-size page or part thereof	40,00
	(ii) For a copy of visual images	60,00
	(e) (i) For a transcription of an audio record, for an A4-size page or part thereof	20,00
	(ii) For a copy of an audio record	30,00
3	The request fee payable by a requester, other than a personal requester, referred to in regulation 11(2)	50,00
4	The access fees payable by a requester referred to in regulation 11(3) are as follows:	
	(1)(a) For every photocopy of an A4-size page or part thereof	1,10
	(b) For every printed copy of an A4-size page or part thereof held on a computer or in electronic or machine-readable form	0,75
	(c) For a copy in a computer-readable form on -	
	(i) stiffy disc	7,50
	(ii) compact disc	70,00
	(d) (i) For a transcription of visual images, for an A4-size page or part thereof	40,00
	(ii) For a copy of visual images	60,00
	(e) (i) For a transcription of an audio record, for an A4-size page or part thereof 20,00	20,00
	(ii) For a copy of an audio record	30,00
	(f) To search for and prepare the record for disclosure for each hour or part of an hour reasonably required for such search and preparation.	30,00

Version Control.

<u>VERSION</u>	<u>DATE</u>	<u>AMENDMENTS</u>
1.0	OCTOBER 2018	Release of the Access to Information Manual
2.0	OCTOBER 2023	Updated Version 2 – Anthony Streak