Dan Dare (Pty) Ltd

## PAIA MANUAL

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

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#### 1. LIST OF ACRONYMS AND ABBREVIATIONS

1.1	"CEO"	Chief Executive Officer
1.2	"DIO"	Deputy Information Officer;
1.3	"IO"	Information Officer;
1.4	"Minister"	Minister of Justice and Correctional Services;
1.5	"PAIA"	Promotion of Access to Information Act No. 2 of 2000( as Amended;
1.6	"POPIA"	Protection of Personal Information Act No.4 of 2013;
1.7	"Regulator"	Information Regulator; and
1.8	"Republic"	Republic of South Africa

#### 2. PURPOSE OF PAIA MANUAL

This PAIA Manual is useful for the public to-

- 2.1 check the categories of records held by a body which are available without a person having to submit a formal PAIA request;
- 2.2 have a sufficient understanding of how to make a request for access to a record of the body, by providing a description of the subjects on which the body holds records and the categories of records held on each subject;
- 2.3 know the description of the records of the body which are available in accordance with any other legislation;

2.4 access all the relevant contact details of the Information Officer and Deputy

Information Officer who will assist the public with the records they intend to access;

2.5 know the description of the guide on how to use PAIA, as updated by the Regulator

and how to obtain access to it;

2.6 know if the body will process personal information, the purpose of processing of

personal information and the description of the categories of data subjects and of

the information or categories of information relating thereto;

2.7 know the description of the categories of data subjects and of the information or

categories of information relating thereto;

2.8 know the recipients or categories of recipients to whom the personal information

may be supplied;

2.9 know if the body has planned to transfer or process personal information outside the

Republic of South Africa and the recipients or categories of recipients to whom the

personal information may be supplied; and

2.10 know whether the body has appropriate security measures to ensure the

confidentiality, integrity and availability of the personal information which is to be

processed.

3. KEY CONTACT DETAILS FOR ACCESS TO INFORMATION OF DAN DARE (PTY)

LTD

3.1. Chief Information Officer

Name:

Diego Madureri

Email:

diego.madureri@icloud.com

3.2 Access to information general contacts

Email: <u>diego.madureri@icloud.com</u>

#### 3.3 National or Head Office

Postal Address: Essenhout Avenue 11

Swannie River Grabouw Western Cape

7160

Physical Address: Essenhout Avenue 11

Swannie River Grabouw Western Cape

7160

Email: diego.madureri@icloud.com

#### 4. GUIDE ON HOW TO USE PAIA AND HOW TO OBTAIN ACCESS TO THE GUIDE

- 4.1. The Regulator has, in terms of section 10(1) of PAIA, as amended, updated and made available the revised Guide on how to use PAIA ("Guide"), in an easily comprehensible form and manner, as may reasonably be required by a person who wishes to exercise any right contemplated in PAIA and POPIA.
- 4.2. The Guide is available in each of the official languages and in braille.
- 4.3. The aforesaid Guide contains the description of
  - 4.3.1. the objects of PAIA and POPIA;

- 4.3.2. the postal and street address, phone and fax number and, if available, electronic mail address of-
  - 4.3.2.1. the Information Officer of every public body, and
  - 4.3.2.2. every Deputy Information Officer of every public and private body designated in terms of section 17(1) of PAIA<sup>1</sup> and section 56 of POPIA<sup>2</sup>:
- 4.3.3. the manner and form of a request for-
  - 4.3.3.1. access to a record of a public body contemplated in section 11<sup>3</sup>; and
  - 4.3.3.2. access to a record of a private body contemplated in section 50<sup>4</sup>:
- 4.3.4. the assistance available from the IO of a public body in terms of PAIA and POPIA;
- 4.3.5. the assistance available from the Regulator in terms of PAIA and POPIA;
- 4.3.6. all remedies in law available regarding an act or failure to act in respect of a right or duty conferred or imposed by PAIA and POPIA, including the manner of lodging-

<sup>&</sup>lt;sup>1</sup> Section 17(1) of PAIA- For the purposes of PAIA, each public body must, subject to legislation governing the employment of personnel of the public body concerned, designate such number of persons as deputy information officers as are necessary to render the public body as accessible as reasonably possible for requesters of its records.

<sup>&</sup>lt;sup>2</sup> Section 56(a) of POPIA- Each public and private body must make provision, in the manner prescribed in section 17 of the Promotion of Access to Information Act, with the necessary changes, for the designation of such a number of persons, if any, as deputy information officers as is necessary to perform the duties and responsibilities as set out in section 55(1) of POPIA.

<sup>&</sup>lt;sup>3</sup> Section 11(1) of PAIA- A requester must be given access to a record of a public body if that requester complies with all the procedural requirements in PAIA relating to a request for access to that record; and access to that record is not refused in terms of any ground for refusal contemplated in Chapter 4 of this Part.

<sup>&</sup>lt;sup>4</sup> Section 50(1) of PAIA- A requester must be given access to any record of a private body if-

that record is required for the exercise or protection of any rights;

b) that person complies with the procedural requirements in PAIA relating to a request for access to that record; and

c) access to that record is not refused in terms of any ground for refusal contemplated in Chapter 4 of this Part.

- 4.3.6.1. an internal appeal;
- 4.3.6.2. a complaint to the Regulator; and
- 4.3.6.3. an application with a court against a decision by the information officer of a public body, a decision on internal appeal or a decision by the Regulator or a decision of the head of a private body;
- 4.3.7. the provisions of sections 14<sup>5</sup> and 51<sup>6</sup> requiring a public body and private body, respectively, to compile a manual, and how to obtain access to a manual;
- 4.3.8. the provisions of sections 15<sup>7</sup> and 52<sup>8</sup> providing for the voluntary disclosure of categories of records by a public body and private body, respectively;
- 4.3.9. the notices issued in terms of sections 22<sup>9</sup> and 54<sup>10</sup> regarding fees to be paid in relation to requests for access; and
- 4.3.10. the regulations made in terms of section 92<sup>11</sup>.

<sup>&</sup>lt;sup>5</sup> Section 14(1) of PAIA- The information officer of a public body must, in at least three official languages, make available a manual containing information listed in paragraph 4 above.

<sup>&</sup>lt;sup>6</sup> Section 51(1) of PAIA- The head of a private body must make available a manual containing the description of the information listed in paragraph 4 above.

<sup>&</sup>lt;sup>7</sup> Section 15(1) of PAIA- The information officer of a public body, must make available in the prescribed manner a description of the categories of records of the public body that are automatically available without a person having to request access

<sup>&</sup>lt;sup>8</sup> Section 52(1) of PAIA- The head of a private body may, on a voluntary basis, make available in the prescribed manner a description of the categories of records of the private body that are automatically available without a person having to request access

<sup>&</sup>lt;sup>9</sup> Section 22(1) of PAIA- The information officer of a public body to whom a request for access is made, must by notice require the requester to pay the prescribed request fee (if any), before further processing the request.

<sup>&</sup>lt;sup>10</sup> Section 54(1) of PAIA- The head of a private body to whom a request for access is made must by notice require the requester to pay the prescribed request fee (if any), before further processing the request.

<sup>&</sup>lt;sup>11</sup> Section 92(1) of PAIA provides that –"The Minister may, by notice in the Gazette, make regulations regarding-

<sup>(</sup>a) any matter which is required or permitted by this Act to be prescribed;

<sup>(</sup>b) any matter relating to the fees contemplated in sections 22 and 54:

<sup>(</sup>c) any notice required by this Act;

<sup>(</sup>d) uniform criteria to be applied by the information officer of a public body when deciding which categories of records are to be made available in terms of section 15; and

<sup>(</sup>e) any administrative or procedural matter necessary to give effect to the provisions of this Act."

- 4.4. Members of the public can inspect or make copies of the Guide from the offices of the public and private bodies, including the office of the Regulator, during normal working hours.
- 4.5. The Guide can also be obtained-
  - 4.5.1. upon request to the Information Officer;
  - 4.5.2. from the website of the Regulator (<a href="https://www.justice.gov.za/inforeg/">https://www.justice.gov.za/inforeg/</a>).
- 4.6 A copy of the Guide is also available in the following two official languages, for public inspection during normal office hours-
  - 4.6.1. English And Afrikaans

## 5. CATEGORIES OF RECORDS OF DAN DARE (PTY) LTD WHICH ARE AVAILABLE WITHOUT A PERSON HAVING TO REQUEST ACCESS

Category of records	Types of the Record	Availability
Administrative Records	<ul> <li>Organizational HR structure and functions Charts</li> <li>Guests' registrations</li> </ul>	Available upon request
Industry-Specific Records	<ul> <li>Product and services offered by the business</li> <li>Hotel rooms descriptions, equipment and price</li> <li>Reservation engine and information</li> <li>Activities and Events</li> <li>Policies and Terms of Service and Cancellation</li> <li>Social Media links</li> <li>Payment options</li> <li>Offers and promotions</li> </ul>	Available upon request
Customer Records	<ul> <li>Customer contacts and personal data</li> <li>Preferences</li> <li>Purchase History</li> <li>Reviews</li> </ul>	Available upon request

Financial Records	<ul> <li>Invoices and Receipts</li> <li>Payroll records</li> <li>Tax filings</li> <li>Bank statements</li> </ul>	Available upon request
Legal Records	<ul> <li>Licenses and certificates</li> <li>Employees Contracts</li> <li>Legal information about the company</li> <li>Contact information</li> </ul>	Available upon request and via CIPC or business directories.
Historical Records	<ul><li>Annual Achievements</li><li>Photographs</li></ul>	Available upon request
Housekeeping and Maintenance Records	- Track room status - Cleaning schedules	Available upon request

## 6. DESCRIPTION OF THE RECORDS DAN DARE (PTY) LTD WHICH ARE AVAILABLE IN ACCORDANCE WITH ANY OTHER LEGISLATION

Category of Records	Applicable Legislation
PAIA Annual submission and certificate	Promotion of access to information act 2 of 2000
POPIA Compliance	POPIA Act 2013
Liquor License	The National Liquor Act 59 of 2003
Health Certificate	National Health act 2003
Certificate of Acceptability	Regulation R638 of 2018 (part of Foodstuffs, Cosmetics, and Disinfectants Act (Act 54 of 1972)

## 7. DESCRIPTION OF THE SUBJECTS ON WHICH THE BODY HOLDS RECORDS AND CATEGORIES OF RECORDS HELD ON EACH SUBJECT BY DAN DARE (PTY) LTD

Subjects on which the body holds records	Categories of records
Finance	<ul> <li>Invoices and receipts</li> <li>Payroll records</li> <li>Tax filings (e.g. Annual Tax Returns – ITR12)</li> <li>Bank statements</li> <li>Financial statements</li> <li>Banking records</li> <li>Creditor's records</li> <li>Debtor's records</li> <li>Budget records</li> </ul>

Human Resources (HR)	<ul> <li>Organizational structure and function charts</li> <li>Policies and procedure</li> <li>Employee contracts</li> <li>Payroll data</li> <li>Training and development records</li> <li>Employee information</li> <li>Leave records</li> </ul>
Supply Chain & Operations (SCM) / Housekeeping	<ul> <li>Cleaning schedules</li> <li>Room status tracking</li> <li>Maintenance logs</li> <li>Procurement documentation</li> <li>Supplier Contracts</li> <li>Inventory records</li> <li>Purchase orders</li> </ul>
Legal	<ul> <li>Company registration certificates</li> <li>Licenses and compliance documents</li> <li>Employee agreements</li> <li>Legal correspondence</li> <li>Shareholder records</li> </ul>
Customer Service & Marketing	<ul> <li>Customer preferences and booking history</li> <li>Reviews and feedback</li> <li>Promotional materials</li> <li>Offers and event records</li> <li>Social media engagements</li> </ul>
Sales & Hospitality Services	<ul> <li>Product and service descriptions</li> <li>Hotel room details and pricing</li> <li>Reservation system information</li> <li>Activity and event schedules</li> <li>Cancellation and refund policies</li> </ul>
IT & Data Management	Reservation engine data     Email communications     Website analytics     Data privacy compliance documentation
Historical Records	<ul><li>Annual achievements</li><li>Archived photographs</li><li>Company milestones</li></ul>
Administrative	<ul><li>Guest registration logs</li><li>Internal policies and memos</li><li>Meeting minutes</li><li>General correspondence</li></ul>

#### 8. PROCESSING OF PERSONAL INFORMATION

#### 8.1 Purpose of Processing Personal Information

Dan Dare (Pty) Ltd processes personal information to support its hospitality operations, enhance service delivery, comply with legal obligations, and improve customer experiences. The primary purposes are grouped by subject below:

#### **Booking and Guest Management:**

- Reservations: To create, modify, and manage guest bookings efficiently.
- Guest Identification: To verify identity and personalize experiences.
- Communication: To confirm booking details and share relevant updates.
- Payment Processing: To execute and manage financial transactions for accommodation and related services.
- Ensuring Quality of Services: To gather feedback through surveys for continual service enhancement.

#### Marketing and Personalization

- Targeted Advertising: To tailor promotional content and service offerings based on guest profiles.
- Personalized Experiences: To analyze guest preferences and offer customized services.
- Direct Marketing: To share newsletters, special offers, and information about local events and attractions.

#### Legal and Security Obligations

- Legal Compliance: To meet regulatory requirements, including accounting and taxation.
- Security: To ensure the safety of guests, staff, and property.
- Fraud Prevention: To detect and mitigate fraudulent activities affecting operations or customers.

#### Improving Operations

- Data Analysis: To identify service trends, optimize operational workflows, and elevate guest satisfaction.
- Service Development: To create new offerings or refine existing hospitality services using feedback and behavioral insights.

#### Other Purposes

- Health Information: To accommodate allergies, dietary restrictions, and other wellness-related concerns.
- Special Needs: To arrange accessible facilities or tailored services for guests with disabilities or specific requirements.

## 8.2 Description of the categories of Data Subjects and of the information or categories of information relating there to

Categories of Data Subjects	Personal Information that may be processed
Employees	Name, surname, nationality, date and place of birth, address, telephone number, ID/passport numbers, UIF and WCA registration numbers, employment status, bank details, work history, health info
Guests	Name, surname, contact details, ID/passport numbers, nationality, booking history, accommodation preferences, payment details, dietary restrictions, feedback/surveys
Service Providers	Name of Company, contact person, Business registration details, banking details, contracts and correspondence, performance records
Website Visitors	IP address, browser type, device information, cookies, location data, user behavior analytics

## 8.3 The recipients or categories of recipients to whom the personal information may be supplied

Category of personal information	Recipients or Categories of Recipients to whom the personal information may be supplied
All Guest information; All Employee information; All Supplier information	Managers
All Guest information; All Employee information	Legal and Regulatory Bodies
Most Guest information; Relevant operational data for fulfillment of services	Service Providers
Insurance Companies; Legal Representatives	Others
System access credentials (limited), usage logs, diagnostics	Technology Providers / IT Support Teams

Employee salary details; Company transaction records; Supplier payment history	Financial Auditors / Accounting Firms
Guest contact information; Reservation details; Preferences and feedback	Travel Agencies / Booking Platforms
Incident reports; Employee health info (if required); Guest safety-related data	Health & Safety Authorities

#### 8.4 Planned transborder flows of personal information

Dan Dare (Pty) Ltd does not engage in any planned transborder flows of personal information. All personal data processed by the company is retained within South Africa and is managed in accordance with local data protection laws and regulations.

## 8.5 General description of Information Security Measures to be implemented by the responsible party to ensure the confidentiality, integrity and availability of the information

Dan Dare (Pty) Ltd employs a layered approach to information security to ensure all personal information is safeguarded against unauthorized access, cyber threats, and data breaches. The following measures are either currently in place or planned for implementation:

- <u>Data Encryption</u>: All sensitive digital information—including emails, cloud-based storage, accounting records, and guest booking data—is protected using advanced encryption protocols. Dan Dare (Pty) Ltd applies encryption both at rest and in transit to ensure that unauthorized individuals cannot access or tamper with the data. Additionally, point-to-point encryption is used for credit card processing, enhancing the security of financial transactions.
- <u>Network Security</u>: Dan Dare implements multiple layers of network protection to secure
  its digital infrastructure. These include firewalls that filter inbound and outbound traffic,
  secure Wi-Fi networks with access restrictions, and virtual private networks (VPNs) for
  encrypted remote connectivity. The IT team conducts regular software updates and
  patching across all devices and systems to mitigate vulnerabilities and maintain a robust
  security posture.
- Other Security Measures: Beyond digital safeguards, the company deploys antivirus and anti-malware solutions on all endpoints to detect and neutralize threats. Regular data backups are conducted and securely stored to ensure data recovery in the event of a breach or loss. Physical access to sensitive areas is restricted and monitored with armed response protocols in place, ensuring comprehensive protection of both digital and physical assets.

#### 9. AVAILABILITY OF THE MANUAL

- 9.1 A copy of the Manual is available-
  - 9.1.1 head office of Dan Dare (Pty) Ltd for public inspection during normal business hours;
  - 9.1.2 on their website
  - 9.1.3 to any person upon request and upon the payment of a reasonable prescribed fee; and
  - 9.1.4 to the Information Regulator upon request.
- 9.2 A fee for a copy of the Manual, as contemplated in annexure B of the Regulations, shall be payable per each A4-size photocopy made.

#### 10. UPDATING OF THE MANUAL

The head of Emma Pardoe Chartered Accountants (SA) will on a regular basis update this manual.

Signed by

D. Madureri

Director