



PAIA MANUAL

**Prepared in terms of Section 51 of the Promotion of Access to Information Act 2 of 2000 (as amended)
And in accordance with the Protection of Personal Information Act, 2013 (POPIA)**

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
- 1.8 "Republic" – Republic of South Africa
- 1.9 "BBBEE" – Broad Based Black Economic Empowerment
- 1.10 "EE" – Employment Equity
- 1.11 "WSP" – Workplace Skills Plan
- 1.12 "CIPC" – Companies and Intellectual Property Commission
- 1.13 "SARS" – South African Revenue Service
- 1.14 "SETA" – Sector Education and Training Authority
- 1.15 "UIF" – Unemployment Insurance Fund
- 1.16 "SDL" – Skills Development Levy
- 1.17 "ROPA" – Records of Processing Activities
- 1.18 "SLA" – Service Level Agreement
- 1.19 "GDS" – Global Distribution System

1.20 "IATA" – International Air Transport Association

1.21 "ASATA" – Association of Southern African Travel Agents

2. PURPOSE OF PAIA MANUAL

This PAIA Manual is useful for the public to:

2.1 Check categories of records held which are available without a formal PAIA request

2.2 Understand how to make a request for access to a record

2.3 Know the description of records available in terms of other legislation

2.4 Access contact details of the Information and Deputy Information Officer(s)

2.5 Know how to obtain the PAIA Guide from the Regulator

2.6 Know the body's personal information processing activities and related safeguards

3. KEY CONTACT DETAILS FOR ACCESS TO INFORMATION

3.1 Information Officer:

Name: Donovan Moodley

Tel:

Email: donovan@thetravelboss.co.za

3.2 Deputy Information Officer:

Name: Kashmeera Parbhoo

Tel:

Email:

3.3 POPIA Consultant:

Name: Sune Koegelenberg

Tel:

Email:

3.4 Head Office:

Postal Address: 32 Roos Street, Fourways Golf Park, Sandton, 2191

Physical Address: 32 Roos Street, Fourways Golf Park, Sandton, 2191

Tel:

Email:

Website:

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 aforesaid Guide contains the description of-

4.2.1 the objects of PAIA and POPIA;

4.2.2 the postal and street address, phone and fax number and, if available, electronic mail address of-

4.2.2.1 the Information Officer of every public body, and

4.2.2.2 every Deputy Information Officer of every public and private body designated in terms of section 17(1) of PAIA¹ and section 56 of POPIA²;

4.2.3 the manner and form of a request for-

4.2.3.1 access to a record of a public body contemplated in section 11³; and

4.2.3.2 access to a record of a private body contemplated in section 50⁴;

4.2.4 the assistance available from the IO of a public body in terms of PAIA and POPIA;

4.2.5 the assistance available from the Regulator in terms of PAIA and POPIA;

4.2.6 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-

4.2.6.1 an internal appeal;

4.2.6.2 a complaint to the Regulator; and

4.2.6.3 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;

4.2.7 the provisions of sections 14⁵ and 51⁶ requiring a public body and private body, respectively, to compile a manual, and how to obtain access to a manual;

4.2.8 the provisions of sections 15⁷ and 52⁸ providing for the voluntary disclosure of categories of records by a public body and private body, respectively;

4.2.9 the notices issued in terms of sections 22⁹ and 54¹⁰ regarding fees to be paid in relation to requests for access; and

4.2.10 the regulations made in terms of section 92¹¹.

4.3 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.

4.4 The Guide can also be obtained-

4.4.1 upon request to the Information Officer; or

4.4.2 from the website of the Regulator ().

5. Records Held by the Company

The Travel Boss (Pty) Ltd maintains various records in both physical and electronic formats to support its operational, financial, legal, and compliance obligations as a travel agency. These records are securely stored and managed in line with applicable legislation, including the Promotion of Access to Information Act (PAIA), the Protection of Personal Information Act (POPIA), and the Companies Act. The categories of records held include, but are not limited to, the following:

5.1 Company Records

These are documents that relate to the legal and statutory existence of the company:

- Certificate of Incorporation (CoR 14.3)
- Memorandum of Incorporation (MOI)
- Company registration certificate and amendments
- Company organogram and governance structures
- Statutory returns submitted to the CIPC

5.2 Financial and Accounting Records

These records are maintained for financial management, statutory reporting, tax compliance, and auditing purposes:

- Annual financial statements
- General ledger and journals
- Trial balances and working papers
- Tax returns (VAT, PAYE, UIF, SDL, Income Tax)
- Invoices and receipts
- Bank statements and reconciliations
- Asset registers and depreciation schedules
- Internal and external audit reports
- Budgets and financial forecasts
- Travel supplier payment records and reconciliations
- Commission statements from airlines, hotels, and tour operators
- Foreign exchange transaction records

5.3 Employee and Human Resource Records

These records support employee administration and compliance with labour legislation:

- Employment contracts and job descriptions
- Payroll records and payslips
- Employee leave records (sick, annual, maternity, family responsibility)
- Performance appraisals and disciplinary records

- Training and skills development plans including WSP submissions
- Travel industry certification records (IATA, GDS training)
- Equity and diversity statistics
- Health and safety incident records
- Records relating to employee benefits (medical aid, provident fund)
- Employee personal information as regulated under POPIA

5.4 Travel Client and Customer Records

These are records relating to the company's relationships with travel clients and customers:

- Customer databases and contact details
- Travel bookings and itineraries
- Passport and visa information
- Travel insurance documentation
- Payment records and credit card transaction details
- Travel preferences and special requirements
- Loyalty program information
- Customer correspondence and service records
- Complaint and feedback records
- Emergency contact information
- Medical and dietary requirements for travel

5.5 Travel Supplier and Vendor Records

These records relate to relationships with travel industry suppliers:

- Airline contracts and booking agreements
- Hotel and accommodation supplier agreements
- Tour operator and ground handler contracts
- Travel insurance provider agreements
- Car rental supplier contracts
- IATA agency agreements and accreditation documents
- GDS (Global Distribution System) contracts
- Commission agreements and payment terms
- Supplier performance evaluations
- B-BBEE certificates and vendor compliance documentation

5.6 Booking and Reservation Records

These records are specific to travel booking operations:

- Flight reservations and ticket records
- Hotel booking confirmations
- Tour and activity bookings
- Travel package documentation

- Cancellation and refund records
- Change fee documentation
- Group booking records
- Corporate travel account records
- Travel voucher and credit note records

5.7 IT, Network, and Website Logs

These records are generated from company ICT systems for monitoring, cybersecurity, and business continuity purposes:

- System usage logs and access logs
- Website analytics and usage reports
- Online booking system logs
- Email and network security monitoring data
- Payment gateway transaction logs
- Software licence records
- Backup and disaster recovery logs

5.8 POPIA Compliance and Data Protection Records

These records support the organisation's compliance with the Protection of Personal Information Act:

- Data subject consent forms and privacy notices
- Personal information impact assessments
- Records of processing activities (ROPA)
- Information Officer appointment and training records
- Data breach incident registers and investigation reports
- PAIA and POPIA policies and procedures
- Internal and external POPIA audit checklists
- Records of training and awareness sessions conducted

5.9 Travel Industry Compliance Records

These records support compliance with travel industry regulations:

- ASATA membership and compliance documentation
- IATA agency licensing and audit records
- Tourism industry registration certificates
- Travel insurance compliance records
- Consumer protection compliance documentation
- Foreign exchange compliance records (where applicable)

6. Automatically Available Records

In accordance with Section 52 of PAIA, the following records are automatically available to the public and may be accessed without the need to formally request them through a PAIA process. These records are freely available on the company website or by request via email:

- Company profile and travel services brochure
- Website content, including travel packages and service descriptions
- Travel destination information and marketing materials
- Terms and Conditions of Travel Services
- Travel booking terms and conditions
- PAIA and POPIA compliance policies and notices
- Privacy Policy
- Cookie Policy (if applicable to web use)
- Information about the company's structure and locations
- Company contact details and operational hours
- Travel industry certifications and accreditations
- Newsletter and travel promotions
- Travel advisories and safety information

7. Processing of Personal Information

The Travel Boss (Pty) Ltd processes personal information in accordance with the Protection of Personal Information Act, 2013 (POPIA), and takes all reasonable steps to protect the confidentiality, integrity, and availability of such information. Personal information is collected and processed for legitimate, lawful, and business-related purposes as detailed below:

7.1 Purpose of Processing Personal Information

The Travel Boss collects and processes personal information for the following purposes:

- **Travel Booking and Service Delivery:** To process travel bookings, issue tickets, make reservations, arrange travel services, and provide customer support throughout the travel experience.
- **Legal and Contractual Obligations:** To comply with applicable South African legislation, international travel requirements, and to execute agreements with customers, suppliers, employees, and contractors.
- **Travel Documentation and Compliance:** To assist with visa applications, process passport information, arrange travel insurance, and comply with international travel and immigration requirements.
- **Human Resources and Employment Administration:** For the management of employees, including recruitment, employment contracts, payroll processing, leave administration, performance management, and benefits administration.

- **Customer Relationship Management:** To manage customer accounts, respond to enquiries, provide travel advice, handle complaints, and maintain effective communication with clients.
- **Financial Administration:** To process payments, issue invoices, manage refunds and cancellations, maintain accounting records, and comply with financial reporting and tax requirements.
- **Marketing and Promotional Communication:** To distribute travel promotions, newsletters, destination information, and marketing material to clients or potential clients, where consent has been obtained in accordance with POPIA.
- **Emergency Assistance and Travel Support:** To provide emergency assistance during travel, communicate with clients during travel disruptions, and coordinate with emergency services when required.
- **Regulatory and Industry Compliance:** To comply with obligations under POPIA, PAIA, the Companies Act, IATA requirements, and travel industry regulations.
- **IT and Cybersecurity Management:** To monitor system access, secure payment processing, prevent fraud, and protect against cyber threats.

7.2 Description of the Categories of Data Subjects

The Travel Boss processes personal information in relation to the following categories of data subjects:

- Travel clients and customers (individuals and corporate travellers)
- Employees (past and present)
- Prospective employees (job applicants)
- Travel companions and family members of clients
- Emergency contacts of travellers
- Suppliers, vendors, and service providers in the travel industry
- Directors, shareholders, and authorised signatories
- Website visitors and online users
- Visitors to company premises

7.3 Categories of Personal Information Processed

The types of personal information processed may include, but are not limited to:

- Full name and contact details (email address, phone number, physical address)
- South African identity number, passport details, and other travel documents
- Date of birth, nationality, and country of residence
- Payment information (credit card details, bank account information)
- Travel preferences, special requirements, and loyalty program details
- Medical information and dietary requirements (where relevant for travel)
- Emergency contact details
- Employment history, qualifications, and performance records (for employees)
- Correspondence history and transactional data

- Website usage data and cookies
- System access credentials and usage logs
- Demographic information (e.g., race, gender, disability status – for EE purposes)

7.4 Legal Grounds for Processing

Processing is based on one or more of the following lawful grounds in terms of POPIA:

- The data subject's consent
- Fulfilment of a contractual obligation
- Compliance with legal or regulatory requirements
- Protection of a legitimate interest of the data subject
- Pursuit of the company's legitimate interests, provided such interests do not override the rights of the data subject

8. Request Procedures

8.1 How to Make a Request for Access to Records

Any person may request access to records held by The Travel Boss (Pty) Ltd by following the procedures set out below:

8.2 Submission of Request

Requests for access to records must:

- Be made in writing, using the **prescribed PAIA Request Form 2 (Annexure A of the 2021 Regulations)**.
- Contain all the information required in terms of **section 53 of PAIA**.
- The prescribed form can be accessed by using the following hyperlink:
- The prescribed Form 2 is also available from the Information Regulator's website:

8.3 Where to Submit Requests

Requests must be submitted to:

- **Deputy Information Officer:** Kashmeera Parbhoo
- Email:

Alternatively

- **Information Officer:** Donovan Moodley
- Email:

- Physical Address: 32 Roos Street, Fourways Golf Park, Sandton, 2191
- Postal Address: 32 Roos Street, Fourways Golf Park, Sandton, 2191
- Telephone:

8.4 Information Required in Request

A request for access to a record must contain the following information:

- Full name and contact details of the requester
- The right the requester is seeking to exercise or protect, and an explanation of why the record is required for the exercise or protection of that right
- Sufficient detail to enable the Information Officer to identify the record(s) requested
- The preferred form of access to the record (inspection, copy, transcript, etc.)
- The postal address or email address of the requester
- If the requester wishes to be informed by telephone or email of the decision, the telephone number and/or email address
- If the request is made on behalf of another person, proof of the capacity in which the requester is making the request

8.5 Response Timeframes

8.5.1 Initial Response

The Information Officer must, within 30 days of receipt of the request:

- Decide whether to grant or refuse the request; and
- Give notice of the decision to the requester

8.5.2 Extension of Time

The 30-day period may be extended for 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
- Consultation with third parties is necessary
- Additional time is needed to determine whether any provision of Chapter 4 of PAIA applies

8.5.3 Notice of Extension

If the time period is extended, the requester must be notified in writing within the original 30-day period, stating:

- The extended period and reasons for the extension
- That the requester may lodge a complaint with the Information Regulator or apply to court

8.6 Third Party Consultation

If the requested record contains information about a third party, the Information Officer may need to:

- Give notice to the third party of the request
- Allow the third party to make representations regarding disclosure
- Consider any representations before making a decision

9. Prescribed Fees

9.1 Fee Structure

The following fees are payable for requests made in terms of PAIA, as prescribed in Government Notice R. 187 of 15 February 2002 (as amended):

9.2 Request Fee

A request fee of R140.00 is payable by every requester except:

- Personal requesters seeking access to records containing their own personal information
- Requests in the public interest

9.3 Access Fees

Service	Fee
For every photocopy of an A4-size page or part thereof	R2.00
For every printed copy of an A4-size page or part thereof held on computer or in electronic/machine-readable form	R2.00
For a copy in a computer-readable form on compact disc	R70.00
For a transcription of visual images for an A4-size page or part thereof	R40.00
For a copy of visual images	R60.00
For a transcription of an audio record for an A4-size page or part thereof	R20.00
For a copy of an audio record on compact disc	R70.00

9.4 Postal Fees

Actual postal fees for delivery will be charged where applicable.

9.5 Search and Preparation Fees

- For searches conducted by or on behalf of The Travel Boss: R145.00 for each hour or part of an hour reasonably required for the search and preparation of the record for disclosure
- This fee is only applicable to requests other than personal requests

9.6 Payment Requirements

9.6.1 Request Fee Payment

- The request fee must be paid before the request will be processed
- Proof of payment must be provided
- If the request fee is not paid within 30 days, the request will be regarded as withdrawn

9.6.2 Access Fee Payment

- The access fee must be paid before access to the record is granted
- An estimate of access fees may be provided and a deposit required
- If the access fee is not paid within 30 days of notification, access to the record will be refused

9.7 Fee Exemptions

No request fee is payable where:

- The requester is seeking access to a record containing that requester's personal information
- The Information Officer is satisfied that the request is made in the public interest

10. Appeals and Complaints

10.1 Internal Appeals

The Travel Boss (Pty) Ltd does not have an internal appeal mechanism as it is not required for private bodies under PAIA. Requesters who are dissatisfied with a decision may proceed directly to lodge a complaint with the Information Regulator or approach a court.

10.2 Complaints to the Information Regulator

10.2.1 Right to Complain

If you are dissatisfied with the response to your PAIA request, you may lodge a complaint with the Information Regulator within 30 days of:

- The decision being communicated to you; or
- The expiry of the response period without receiving a response

10.2.2 Information Regulator Contact Details

- Physical Address: Woodmead North Office Park, 54 Maxwell Dr, Woodmead, Johannesburg, 2191
- Postal Address: P.O Box 31533, Braamfontein, Johannesburg, 2017
- Email:
- Telephone: 010 023 5200
- Website:

10.2.3 Complaint Requirements

Your complaint should include:

- Your contact details
- Details of the PAIA request made
- The response received (or lack thereof)
- The reasons why you believe the response was inadequate
- Copies of relevant correspondence

10.3 Court Applications

10.3.1 Right to Approach Court

You may apply to court for appropriate relief if you are not satisfied with:

- A decision of the Information Officer
- A decision by the Information Regulator
- The failure of the Information Officer to respond within the prescribed timeframes

10.3.2 Time Limits

Applications to court must generally be made within 30 days of the relevant decision or event.

10.3.3 Legal Representation

You may wish to seek legal advice before approaching the court, as legal costs may be awarded against an unsuccessful party.

11. Data Subject Categories and Information

The Travel Boss (Pty) Ltd processes personal information relating to multiple categories of data subjects in the course of conducting its travel agency business. The types of personal information collected are appropriate to the nature and purpose of the relationship with each data subject.

Category of Data Subjects	Types of Personal Information Processed
Travel Clients and Customers	Full name, contact details, passport details, visa information, date of birth, nationality, payment information, travel preferences, special dietary/medical requirements, emergency contacts, travel history, loyalty program details
Corporate Travel Clients	Company details, traveller profiles, travel policies, billing information, cost centre codes, approval hierarchies, frequent traveller preferences

Category of Data Subjects	Types of Personal Information Processed
Travel Companions and Family Members	Names, ages, passport details, relationship to main traveller, special requirements, emergency contact information
Employees (current and former)	Full name, ID number, contact details, employment contracts, remuneration, leave records, performance evaluations, travel industry certifications (IATA, GDS), employment equity data
Prospective Employees	CV, qualifications, references, identity number, contact details, interview notes, travel industry experience
Travel Suppliers and Vendors	Company registration, contact persons, contract terms, payment details, service agreements, performance ratings, compliance certificates
Website Visitors and Online Users	IP addresses, browser information, booking search preferences, pages visited, device information, cookies data
Emergency Contacts	Names, relationships, contact numbers, addresses (for travellers)
Visitors to Company Premises	Full name, contact number, vehicle registration, visit purpose, date and time of visit, CCTV footage (if applicable)

All personal information collected is limited to what is necessary, relevant, and proportionate to the purpose for which it is collected. Such information is processed in accordance with POPIA's eight conditions for lawful processing, and retained only as long as necessary for operational, legal, or regulatory purposes.

12. Recipients of Personal Information

The Travel Boss (Pty) Ltd shares personal information with authorised third parties only when such disclosure is necessary for the fulfilment of legitimate business, legal, or contractual purposes, or where required by law. All third-party recipients are contractually obligated to maintain the confidentiality and integrity of personal information in accordance with POPIA.

The following categories of recipients may receive personal information, as relevant to the purpose of processing:

Category of Personal Information	Recipients or Categories of Recipients
Travel booking and documentation details	Airlines, hotels, tour operators, car rental companies, travel insurance providers, visa processing agencies, ground handlers, and other travel service providers — for booking confirmation and service delivery
Payment and financial information	Banks, payment gateways, credit card processors, travel supplier payment systems — for transaction processing and payment settlement
Identity and travel documents	Immigration authorities, embassies, consulates, visa processing centres — for visa applications and travel authorization
Emergency and medical information	Emergency service providers, travel assistance companies, medical facilities, travel insurance claim processors — for emergency response and medical assistance
Employee information, tax data	SARS, Department of Labour, SETAs, UIF, medical aid schemes, pension fund administrators — for statutory compliance and benefits administration
Legal and compliance data	Legal advisors, auditors, POPIA compliance consultants — for legal representation, compliance monitoring, and audit purposes
System and technical data	IT service providers, cybersecurity specialists, payment security assessors, GDS providers — for system maintenance, security monitoring, and technical support
Marketing and communication data	Email service providers, marketing platforms, analytics services — for customer communication and marketing campaign management (with consent)
Regulatory reporting data	CIPC, SARS, ASATA, travel industry regulatory bodies — for statutory reporting and industry compliance

13. Security Safeguards

General Description of Information Security Measures

The Travel Boss (Pty) Ltd implements a set of technical, physical and administrative security measures to protect personal information from loss, unauthorised access, interference, modification, destruction, or disclosure. These safeguards are aligned with the requirements of the Protection of Personal Information Act (POPIA) and travel industry security standards and are reviewed regularly for effectiveness.

The following security measures are in place:

- **Data Encryption and Protection:** Sensitive personal information, including passport details and payment data, is encrypted both in transit and at rest. Secure protocols are used for all web-based transactions and communications.
- **Access Control and Authentication:** Staff access to client information is restricted based on job role and necessity. Multi-factor authentication is implemented for accessing critical systems, and regular access reviews ensure appropriate permissions.
- **Network and Endpoint Security:** Firewalls, anti-malware software, and endpoint detection systems protect against cyber threats. Regular security updates and patches are applied to all systems and software.
- **Backup and Data Recovery:** Regular automated backups of critical data are performed, with secure off-site storage. Backup systems are tested regularly to ensure data recovery capabilities in case of system failures or security incidents.
- **Staff Training and Awareness:** Employees receive training on data protection obligations, travel industry security requirements, fraud prevention, and safe handling of personal information. Regular refresher training ensures ongoing compliance awareness, most notably in terms of POPIA.
- **Physical Security:** Office premises are secured with access control systems, and sensitive documents are stored in locked facilities. Visitor access is monitored.
- **Vendor and Supplier Security:** All travel suppliers and third-party service providers are required to maintain appropriate security standards and sign confidentiality agreements as per POPIA.
- **Travel Document Security:** Client travel documents and sensitive information are handled with special care, with restricted access and secure transmission protocols when sharing with travel suppliers or authorities.

These measures ensure that The Travel Boss (Pty) Ltd maintains the confidentiality, integrity, and availability of personal information in line with POPIA obligations and travel industry best practices.

14. AVAILABILITY OF THE MANUAL

A copy of the Manual is available-

- At
- Head office of The Travel Boss (Pty) Ltd for public inspection during normal business hours (8 am–5 pm);
- To any person upon request via the prescribed form and upon the payment of a reasonable prescribed fee; and
- To the Information Regulator upon request.

15. Grounds for Refusal

The Travel Boss (Pty) Ltd recognises the constitutional right of access to information under Section 32 of the Constitution and supports transparency and accountability. However, access to certain records may be refused in accordance with Chapter 4 of PAIA, particularly where disclosure would result in harm to the rights or interests of the company, third parties, or public safety.

Requests for access to information may be refused on one or more of the following legal grounds:

15.1 Protection of Third-Party Commercial or Confidential Information

Access may be refused if the record contains:

- Trade secrets of travel suppliers or business partners;
- Commercial pricing information, supplier contracts, or commission structures that could harm competitive interests;
- Confidential business strategies or operational procedures;
- Information supplied in confidence by travel industry partners, the disclosure of which could prejudice business relationships.

15.2 Protection of Personal Information of Third Parties

A request may be refused if the record contains personal information about a third party, unless:

- The third party has consented to the disclosure;
- The information is publicly available; or
- The disclosure is in the public interest and outweighs the harm that may result from such disclosure.

This is particularly relevant for travel records containing personal information of other clients, travel companions, or employees.

15.3 Legal Privilege

Records that are subject to legal professional privilege may not be disclosed. This includes:

- Correspondence between the company and its legal advisors;
- Documents prepared in anticipation of legal proceedings;
- Legal opinions and advice relating to business operations.

15.4 Protection of the Safety of Individuals and Security

A request may be refused if granting access would:

- Endanger the life or physical safety of travellers or staff;
- Compromise travel security arrangements or emergency procedures;

- Prejudice or impair the security of computer systems, payment processing, or communication networks.

15.5 Protection of the Company's Commercial Activities

Access may be refused if it contains:

- Trade secrets or commercially sensitive information belonging to the company;
- Supplier pricing arrangements, commission structures, or negotiated rates;
- Business development plans or competitive strategies;
- Information that would place the company at a disadvantage in commercial negotiations.

15.6 Protection of Client Privacy and Travel Security

Access may be refused to protect:

- Detailed travel itineraries that could compromise traveller safety;
- Payment and financial information of clients;
- Travel preferences and personal requirements that constitute private information;
- Security arrangements for high-profile or VIP clients.

15.7 Manifestly Frivolous or Vexatious Requests

Access may be refused if a request is manifestly frivolous, vexatious, or places an unreasonable administrative burden on the company.

15.8 Travel Industry Confidentiality

Access may be refused to protect:

- Confidential arrangements with travel suppliers;
- Industry pricing and rate information;
- Proprietary booking systems or operational procedures;
- Information that could compromise relationships with travel industry partners.

All refusals will be provided in writing with reasons, and the requester will be informed of their right to lodge a complaint with the Information Regulator or approach a court for relief in terms of Section 78 of PAIA.

16. Review and Updates

Compiled on: 3 September 2025 (Version: 1.0)

Next review: Year-end 2026

Issued by:


Donovan Moodley (Donovan Moodley)
Director - The Travel Boss (Pty) Ltd

17. Additional Travel Industry Specific Considerations

17.1 International Data Transfers

The Travel Boss (Pty) Ltd may need to transfer personal information internationally for the following purposes:

- Flight bookings and airline reservations
- Hotel and accommodation bookings
- Visa applications and consular services
- Travel insurance claims processing • Emergency assistance and repatriation services

All international transfers are conducted in accordance with POPIA requirements and adequate safeguards are implemented to protect personal information.

17.2 Travel Documentation Requirements

Certain records may be subject to specific retention periods due to travel industry regulations:

- IATA ticketing records - 7 years
- Financial transaction records - 5 years
- Customer booking records - 3 years after travel completion
- Insurance documentation - As per insurance policy terms
- Visa and passport copies - Until travel completion + 1 year

17.3 Emergency Access Procedures

In cases of travel emergencies, The Travel Boss (Pty) Ltd may need to access and share client personal information urgently for:

- Medical emergencies during travel
- Natural disasters or political unrest affecting travellers
- Flight cancellations or travel disruptions
- Lost or stolen travel documents
- Family emergency notifications

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.

⁴ Section 50(1) of PAIA- A requester must be given access to any record of a private body if- a) 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.

⁵ Section 14 of PAIA requires public bodies to compile a manual.

⁶ Section 51(1) of PAIA- The head of a private body must make available a manual containing the description of the information as prescribed.

⁷ 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.

⁸ 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.

⁹ 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.

¹⁰ 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.

¹¹ Section 92(1) of PAIA provides that –"The Minister may, by notice in the Gazette, make regulations regarding- (a) any matter which is required or permitted by this Act to be prescribed; (b) any matter relating to the fees contemplated in sections 22 and 54; (c) any notice required by this Act; (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 (e) any administrative or procedural matter necessary to give effect to the provisions of this Act."

END OF MANUAL

Company Registration Number: 2020/580787/07 -Vat Registration Number: 4400292761
BBBEE Status: Level 1 - Director - Donovan Moodley
Physical Address: Fourways Golf Park, Augusta Building, Roos Street, Johannesburg, 2190
Email: Donovan@thetravelboss.co.za Contact Number: +27 (0) 73 147 2237
Website: www.thetravelboss.co.za