

PAIA MANUAL PREPARED IN ACCORDANCE WITH SECTION 51 OF THE PROMOTION OF
ACCESS TO INFORMATION ACT, NO. 2 OF 2000 (AS AMENDED)

FOR



(Registration Number 1994/000253/07)

and its subsidiaries

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1. INTRODUCTION

Flight Centre Travel Group (Pty) Ltd and its subsidiaries ("FCTG SA") conduct its operations in compliance with all legal and regulatory requirements. This Manual is intended to ensure that:

- FCTG SA, as private bodies, complies with Section 51 of the Promotion of Access to Information Act 2 of 2000 (PAIA) and the Protection of Personal Information Act, Act No 4 of 2013 ("POPI");
- it provides requirements on how to request information or records from FCTG SA;
- 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 relates to records and information in the possession of FCTG SA and the publication or release of any of these records and information to the public. Reference made to FCTG SA in this Manual will include the following entities listed below:

- Flight Centre Travel Group (Pty) Ltd;
- FCTG Corporate (Pty) Ltd; and
- FCM Travel Solutions (Pty) Ltd.

This Manual will 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 FCTG SA's websites and a PDF copy can also be inspected at the premises of FCTG SA's head offices situated at Block 8, 299 Pendoring Road, Blackheath, Johannesburg, during normal business hours. Upon request, any reproduction of the Manual will incur a fee as prescribed under PAIA for the reproduction of a document.

2. DEFINITIONS

The following words shall bear the same meaning as under POPI as follows:

- 2.1. Data Subject – means the person to whom Personal Information relates;
- 2.2. Information Officer – means the head of a private body as contemplated in section 1, of the PAIA;

- 2.3. Manual – this manual together with all annexures;
- 2.4. Office Hours – 08:00 am to 17:00 pm Monday to Friday, excluding public holidays;
- 2.5. PAIA – the Promotion of Access to Information Act, 2 of 2000 (as amended);
- 2.6. Personal Information – means information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person including but not limited to:
 - 2.6.1. information relating to the race, gender, sex, pregnancy, marital status, national, ethnic or social origin, colour, sexual orientation, age, physical or mental health, well-being, disability, religion, conscience, belief, culture, language and birth of the person;
 - 2.6.2. information relating to the education or the medical, financial, criminal or employment history of the person;
 - 2.6.3. any identifying number, symbol, e-mail address, physical address, telephone number or other particular assignment to the person;
 - 2.6.4. the blood type or any other biometric information of the person;
 - 2.6.5. the personal opinions, views or preferences of the person;
 - 2.6.6. correspondence sent by the person that is implicitly or explicitly of a private or confidential nature or further correspondence that would reveal the contents of the original correspondence;
 - 2.6.7. the views or opinions of another individual about the person; and
 - 2.6.8. the name of the person if it appears with other Personal Information relating to the person or if the disclosure of the name itself would reveal information about the person

But excludes information about an individual who has been deceased for more than 20 years.
- 2.7. POPI – Protection of Personal Information Act No.4 of 2013;
- 2.8. Regulator – Information Regulator established in terms of section 39 of POPI;
- 2.9. Republic – Republic of South Africa;

3. PURPOSE OF THIS MANUAL

This Manual is useful for the public to -

- 3.1. check the categories of records held by a body which are available without a person having to submit a formal PAIA request;
- 3.2. 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;
- 3.3. know the description of the records of the body which are available in accordance with any other legislation;
- 3.4. 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;
- 3.5. know the description of the guide on how to use PAIA, as updated by the Regulator and how to obtain access to it;
- 3.6. 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;
- 3.7. know the description of the categories of Data Subjects and of the information or categories of information relating thereto;
- 3.8. know the recipients or categories of recipients to whom the Personal Information may be supplied;
- 3.9. know if the body has planned to transfer or process Personal Information outside the Republic and the recipients or categories of recipients to whom the Personal Information may be supplied; and
- 3.10. know whether the body has appropriate security measures to ensure the confidentiality, integrity and availability of the Personal Information which is to be processed.

4. CONTACT DETAILS FOR ACCESS TO INFORMATION OF FCTG SA

4.1. Information Officer:

Name: Euan McNeil (Managing Director MEA)

Tel: 011 778 1300

Email: euan.mcneil@fctg.co.za

4.2. Access to information general contacts

Email: privacy@fctg.co.za

4.3. **National or Head Office**

Postal Address: PO Box 3811, Northcliff, 2115

Physical Address: Block 8, 299 Pendoring Road, Blackheath, Johannesburg 2195

Telephone: 011 778 1300

Email: privacy@fctg.co.za

4.4. Websites: www.flightcentre.co.za, <https://www.fcmtravel.com/en-za>,
<https://www.corporatetraveller.co.za/>, <https://www.flightcentreindependent.co.za/>

5. GUIDE ON HOW TO USE PAIA AND HOW TO OBTAIN ACCESS TO THE GUIDE

5.1. 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 POPI.

5.2. The Guide is available in each of the official languages and in braille.

5.3. The aforesaid Guide contains the description of-

5.3.1. the objects of PAIA and POPI;

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

5.3.2.1. the Information Officer of every public body, and

5.3.2.2. every deputy information officer of every public and private body designated in terms of section 17(1) of PAIA and section 56 of POPI;

5.3.3. the manner and form of a request for-

- 5.3.3.1. access to a record of a public body contemplated in section 11 of PAIA; and
 - 5.3.3.2. access to a record of a private body contemplated in section 50 of PAIA;
 - 5.3.4. the assistance available from the Information Officer of a public body in terms of PAIA and POPI;
 - 5.3.5. the assistance available from the Regulator in terms of PAIA and POPI;
 - 5.3.6. 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 POPI, including the manner of lodging-
 - 5.3.6.1. an internal appeal;
 - 5.3.6.2. a complaint to the Regulator; and
 - 5.3.6.3. 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;
 - 5.3.7. the provisions of sections 14 and 51 of PAIA requiring a public body and private body, respectively, to compile a manual, and how to obtain access to a manual;
 - 5.3.8. the provisions of sections 15 and 52 of PAIA providing for the voluntary disclosure of categories of records by a public body and private body, respectively;
 - 5.3.9. the notices issued in terms of sections 22 and 54 of PAIA regarding fees to be paid in relation to requests for access; and
 - 5.3.10. the regulations made in terms of section 92 of PAIA.
- 5.4. 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.
- 5.5. The Guide can also be obtained-

5.5.1. upon request to the Information Officer;

5.5.2. from the website of the
Regulator:https://www.justice.gov.za/inforeg/docs/misc/PAIA-Guide-English_20210905.pdf

5.6. A copy of the Guide is also available in English for public inspection during normal Office Hours.

6. CATEGORIES OF RECORDS OF FCTG SA WHICH ARE AVAILABLE WITHOUT A PERSON HAVING TO REQUEST ACCESS

6.1. At this stage no notices have been published by the Regulator on the categories of records automatically available without a person having to request access thereto in terms of PAIA.

6.2. The records that are located on FCTG SA's websites, however, are automatically available and are freely accessible to any person requesting this information. It is therefore not necessary to apply for access thereto in terms of PAIA. FCTG SA's website addresses are:

6.2.1. <https://www.flightcentre.co.za/>,

6.2.2. [https://www.fcmtravel.com/en-za](https://www.fcmtravel.com/en-za;);

6.2.3. <https://www.corporatetraveller.co.za/>; and

6.2.4. <https://www.flightcentreindependent.co.za/>.

7. DESCRIPTION OF THE RECORDS OF FCTG SA WHICH ARE AVAILABLE IN ACCORDANCE WITH ANY OTHER LEGISLATION

7.1. FCTG SA is required in accordance with legislation to retain certain records. We hold records for the purposes of PAIA in accordance with the following legislation, among others –

7.1.1. Basic Conditions of Employment Act 75 of 1997;

7.1.2. Broad-Based Black Economic Empowerment Act 53 of 2003;

7.1.3. Companies Act 71 of 2008;

7.1.4. Compensation for Occupational Injuries and Diseases Act 130 of 1993;

- 7.1.5. Electronic Communications and Transaction Act 25 of 2002;
- 7.1.6. Employment Equity Act 55 of 1998;
- 7.1.7. Income Tax Act 58 of 1962;
- 7.1.8. Labour Relations Act 66 of 1995;
- 7.1.9. Occupational Health and Safety Act 85 of 1993;
- 7.1.10. Skills Development Levies Act 9 of 1999;
- 7.1.11. Skills Development Act 9 of 1999;
- 7.1.12. Unemployment Insurance Act 63 of 2001; and
- 7.1.13. Value Added Tax Act 89 of 1991.

8. DESCRIPTION OF THE SUBJECTS ON WHICH FCTG SA HOLDS RECORDS AND CATEGORIES OF RECORDS HELD ON EACH SUBJECT BY FCTG SA

The table below contains a description of the types of records / subjects on which FCTG SA holds, and the categories of records held on each subject. These records are not automatically available without a request in terms of PAIA. A request made in terms of PAIA for records in any of the categories below may be refused in accordance with any of the grounds of refusal as set out in PAIA.

Subject	Description
Finance	<ul style="list-style-type: none"> - Bank statements - A list of the company's debtors and creditors - Budgets - Management accounts - Asset registers - Invoices - Salaries - Audited annual financial statements
Income Tax	<ul style="list-style-type: none"> - Pay-as-you-earn (PAYE) records - Documents issued to employees for income tax purposes - Records of payments made to South African Revenue Services on behalf of employees - All or any statutory compliance - Value Added Tax - Skills development levies - Unemployment Insurance Fund

Subject	Description
Labour relations records	<ul style="list-style-type: none"> - Personnel documents and records - Employment contracts - Medical aid records - Pension Fund records - Disciplinary records - Salary records - Disciplinary code and/or procedures - Leave records - Training records - Training manuals - Address lists - Internal telephone lists
Audit and Risk	<ul style="list-style-type: none"> - Contracts - Policies and procedures - Risk assessment - Insurance records
Statutory Records	<ul style="list-style-type: none"> - Company incorporation documents - Share register - Memorandum of Incorporation - Minutes of meetings of the board of directors - Records relating to the appointment of directors, auditors, and other officers
Strategic Documents, Plans, Proposals	<ul style="list-style-type: none"> - Annual Reports - Strategic Plan
Travel Management	<ul style="list-style-type: none"> - Travel bookings for customers - Travel related information - Invoices - Itineraries - Supplier lists

9. PROCESSING OF PERSONAL INFORMATION

9.1. Purpose of Processing Personal Information

FCTG SA processes Personal Information in accordance with POPI. In terms of our privacy notice, FCTG SA will ensure that all processing conditions of POPI are complied with at the time of processing any Personal Information. FCTG SA processes Personal Information of both living and juristic persons. FCTG SA is required to process Personal Information in order to perform its business functions and activities which include making and managing travel bookings on behalf of its customers.

- 9.2. FCTG SA processes the following Personal Information relating to the following categories of Data Subject, including but not limited to –

Categories of Data Subjects	Personal Information that may be processed
Individual Customers	Name, identity number, physical address, email address, passport details, payment account information, health information such as dietary requirements and health issues, other details relevant to travel arrangements or required by the relevant travel service provider(s) (e.g. airlines and accommodation or tour providers)
Juristic Persons (Corporate Customers)	Entity name, registration number, tax-related information, contact details for representatives, banking information including account numbers and payment account information.
Service Providers	Company registration details, identity numbers, BEE certificates, tax clearance, income tax and VAT registration details, payment information including bank account numbers, invoices, contractual agreements, addresses, contact details, CCTV images.
Employees, potential employees, new recruitments	Name, surname, South African identity number or other identifying number, contact details, physical and postal address, date of birth, age, marital status, race, disability, information, employment history, criminal background checks, CVs, education history, banking details, income tax reference number, remuneration and benefit information, health information, details related to employee performance, disciplinary procedure information, CCTV images, biometric data.

9.3. **Disclosure of Personal Information to third parties**

We disclose your Personal Information, for legitimate business purposes, to suppliers and third parties travel providers such as airlines, hotels, car rental and tour providers. These providers are independent Responsible Parties and are obliged to comply with POPI and PAIA.

9.4. **Trans-border flows of Personal Information**

FCTG SA may transfer your Personal Information to certain overseas recipients, such as its overseas related entities and to travel service providers located overseas. FCTG SA ensures that any such international transfers are either

necessary for the performance of a contract between the customer and the overseas recipient or are made subject to appropriate or suitable safeguards as required by Section 72 of POPI.

9.5. General description of Information Security Measures to be implemented by FCTG SA to ensure the confidentiality, integrity and availability of the information

Reasonable technical and organisational measures have been implemented for the protection of Personal Information processed by FCTG SA and its operators. In terms of POPI, operators are third parties that process Personal Information on behalf of FCTG SA.

We continuously implement and monitor technical and organisational security measures to protect the Personal Information we hold, against unauthorised access, as well as accidental or wilful manipulation, loss or destruction.

We will take steps to ensure that operators that process Personal Information on behalf of FCTG SA apply adequate safeguards as outlined above.

10. HOW TO REQUEST ACCESS TO A RECORD

- 10.1. To request a record in terms of PAIA, the requestor must complete the prescribed form available [HERE](#) as Annexure A. This request must be sent to the Information Officer at the addresses provided in paragraph 4.2 and 4.3.
- 10.2. For POPI related requests to object to the processing of Personal Information, correct or delete Personal Information, the request must be made on the Subject Access Request link available on our website.
- 10.3. The requestor must provide sufficient detail to enable the Information Officer to identify the record(s) requested and the requestor. The requestor must indicate which form of access is required, identify the right that he/she is seeking to exercise or protect and provide an explanation of why the requested record is required for the exercise or protection of that right.
- 10.4. If the request is made on behalf of another person, the requestor must submit proof of the capacity in which the requestor is making the request, to the reasonable satisfaction of the Information Officer.

- 10.5. PAIA makes provision for certain grounds upon which a request for access to information must be refused. On this basis, the Information Officer will decide whether or not to grant a request for access to information.

11. PAYMENT OF FEES

- 11.1. PAIA provides for two types of fees, namely –
- 11.1.1. a request fee, which will be a standard non-refundable administration fee, payable prior to the request being considered; and
 - 11.1.2. an access fee, payable when access is granted which must be calculated by taking into account reproduction costs, search and preparation time and cost, as well as postal costs.
- 11.2. Subsequent to a request being made, the Information Officer, shall, by notice, require the requester, excluding personal requester, to pay the prescribed request fee (if any), before further processing of the request.
- 11.3. If the search for and preparation for disclosure of the record has been made, including arrangement to make it available in the requested form, requires more than the hours prescribed in the regulations for this purpose, FCTG SA will request the requester to pay as a deposit the prescribed portion of the access fee which would be payable if the request is granted.
- 11.4. FCTG SA may withhold a record until the requester has paid the fees as indicated in Annexure B.
- 11.5. A requester whose request has been granted must pay the applicable access fee for reproduction, search, 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 request form.
- 11.6. In terms of POPI, a Data Subject has the right to request FCTG SA to confirm, free of charge, whether or not it holds Personal Information about the Data Subject and request from FCTG SA the record or a description of the Personal Information held, including information about the identity of all third parties, or categories of third parties, who have, or have had, access to the information.
- 11.7. POPI further provides that where the Data Subject is required to pay a fee for services provided to them, FCTG SA must provide the Data Subject with a written

estimate of the payable amount before providing the service and may require that the requestor pay a deposit for all or part of the fee.

12. APPLICABLE TIME-PERIODS

- 12.1. FCTG SA will inform the requestor within 30 days after receipt of the request of its decision whether or not to grant the request.
- 12.2. 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 FCTG SA or the records are not located at FCTG SA's offices.

13. OUTCOME OF THE REQUEST (GRANTING OR REFUSING)

Should the request be refused, the notice will state adequate reasons for the refusal, including the provisions of the PAIA relied upon; and that the requestor may lodge an application with a Court against the refusal of the request.

14. GROUNDS FOR REFUSAL OF ACCESS TO RECORDS

- 14.1. In terms of Section 62 to 69 of PAIA access granted to a record may be refused on one or more of the following grounds –
 - 14.1.1. protection of privacy to a third party who is a natural person;
 - 14.1.2. protection of the commercial information of a third party;
 - 14.1.3. protection of certain confidential information of a third person;
 - 14.1.4. protection of the safety of individuals and the protection of property;
 - 14.1.5. protection of records privileged from production and legal proceedings;
 - 14.1.6. the commercial information and activities of FCTG SA;
 - 14.1.7. the protection of research information of a third party; and
 - 14.1.8. any other ground legally available on which to refuse access to the information requested.

14.2. Despite any provisions of PAIA, a request must be granted if the disclosure of the record would reveal evidence of substantial contravention of, or failure to comply with, the law or imminent and serious public safety or environment risk, and the public interest in the disclosure of the record clearly outweighs the harm contemplated in terms of section 70 of PAIA.

15. REMEDIES FOR REFUSAL

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.

16. AVAILABILITY OF THE MANUAL

This manual is available in electronic and hard copies in English. The hard copies are available at the head office of FCTG SA as contained in paragraph 5.2. The electronic version of this manual is available on FCTG SA's website.

17. UPDATING OF THE MANUAL

This manual will be reviewed and updated on a regular basis if necessary.

ANNEXURE B

FEES PAYABLE IN RESPECT OF RECORDS REQUESTED FROM FCTG SA

The fees, in respect of private bodies, are as follows –	Rands
For every photocopy of an A4-size page or part thereof	R 1.10
For every printed copy of an A4-size page or part thereof held on a computer or in electronic or machine-readable form	R 0.75
For a copy in a computer-readable form on – <ul style="list-style-type: none"> • floppy disc R 7.50 • compact disc R 70.00 	
For a transcription of visual images, for an A4-size page or part thereof	R 40.00
For a copy of visual images	R 60.00
For a transcription of an audio record, for an A4-size page or part thereof	R 20.00
For a copy of an audio record	R 30.00
The request fee payable by a requester, other than a personal requester	R 50.00
The access fees payable by a requester are as follows –	
For every photocopy of an A4-size page or part thereof	R 1.10
For every printed copy of an A4-size page or part thereof held on a computer or in electronic or machine-readable form	R 0.75
For a copy in a computer-readable form on - <ul style="list-style-type: none"> • floppy disc R 7.50 • compact disc R 70.00 	
For a transcription of visual images, for an A4-size page or part thereof	R 40.00
For a copy of visual images	R 60.00
For a transcription of an audio record, for an A4-size page or part thereof	R 20.00
For a copy of an audio record	R 30.00
To search for and prepare the record for disclosure, R30.00 for each hour or part of an hour reasonably required for such search and preparation.	

For purposes of section 54(2) of PAIA, the following applies –

- Six hours as the hours to be exceeded before a deposit is payable; and
- one third of the access fee is payable as a deposit by the requester.

The actual postage is payable when a copy of a record must be posted to a requester.