



REG NO: 2017/055332/07

## Promotion of Access to Information Manual

Compiled as a private body in terms of Section 51 of the Promotion of Access to Information Act 2 of 2000 ("PAIA")

### **POPIA - Request Forms**

This Manual also includes information on the submission of objections to the processing of personal information and requests to delete or destroy personal information or records thereof in terms of the Protection of Personal Information 4 of 2013 ("POPIA").

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## 1. INTRODUCTION

- 1.1. **Incentives At Sea And Beyond (PTY) LTD** conducts business as a travel management company:
- 1.2. This Manual applies only to **Incentives At Sea And Beyond (PTY) LTD**. Each South African entity referenced in the above table has its own Manual in terms of Section 51 of PAIA which will apply to that specific entity.

## 2. DEFINITIONS AND INTERPRETATION

- 2.1. Unless otherwise expressly stated, or the context otherwise requires, the words and expressions listed below shall, when used in this Manual or in any schedules hereto, bear the meanings ascribed to them below and cognate expressions bear corresponding meanings:
  - 2.1.1. **“Board”** means the Board of Directors of **Incentives At Sea And Beyond (PTY) LTD** serving from time to time;
  - 2.1.2. **“Directors”** means those persons appointed as executive or non-executive Directors to the Board according to **Incentives At Sea And Beyond (PTY) LTD** memorandum of incorporation and the ruling policies and procedures applicable to **Incentives At Sea And Beyond (PTY) LTD** from time to time;
  - 2.1.3. **“Incentives At Sea And Beyond (PTY) LTD”** means **Incentives At Sea And Beyond (PTY) LTD** with registration number **2017/055332/07**
  - 2.1.4. **“PAIA”** means the Promotion of Access to Information Act 2 of 2000.
  - 2.1.5. **“Personal Information”** means personal information as defined in POPIA.
  - 2.1.6. **“POPIA”** means the Protection of Personal Information Act 4 of 2013.
  - 2.1.7. **“Records”** means any recorded information—

Regardless of form or medium, including any of the following:

    - (i) writing on any material;
    - (ii) information produced, recorded or stored by means of any tape-recorder, computer equipment, whether hardware or software or both, or other device, and any material subsequently derived from information so produced, recorded or stored;
    - (iii) label, marking or other writing that identifies or describes anything of which it forms part, or to which it is attached by any means;
    - (iv) book, map, plan, graph or drawing;
    - (v) photograph, film, negative, tape or other device in which one or more visual images are embodied to be capable, with or without the aid of some other equipment, of being reproduced;
  - 2.1.8. **“this Manual”** means this PAIA Manual.

2.2. In this Manual:

- 2.2.1. table of contents and paragraph headings are for purposes of reference only and shall not be used in interpretation.
- 2.2.2. unless the context clearly indicates a contrary intention, any word connoting any gender includes the other genders, and the singular includes the plural and vice versa;
- 2.2.3. When several days are prescribed such number shall exclude the first and include the last day unless the last day is not a business day, in which case the last day shall be the next succeeding business day.

**3. CONTACT DETAILS AND INFORMATION OFFICER [Sec 51(1)(a)]**

3.1. All queries and requests concerning **Incentives At Sea And Beyond (PTY) LTD** may be addressed to our Information Officer below.

<b>Name of Body</b>	<b>Incentives At Sea And Beyond (PTY) LTD</b>
<b>Nature of Business</b>	(1) Private Body in terms of section 51 of PAIA.
<b>Registration Number</b>	2017/055332/07
<b>Physical Address</b>	STAND 722-6 (384) BROADBURY CIRCLE, CORNWALL HILL COUNTRY ESTATE, IRENE, 0157
<b>Postal Address</b>	POSTNET SUITE 024, PRIVATE BAG X03, WOODHILL, 0076
<b>Telephone Number</b>	+2782 335 6531
<b>Facsimile Number</b>	No facsimile number
<b>Executive Head of Body</b>	STEFANO ORONI
<b>Designated Information Officer</b>	STEFANO ORONI
<b>E-mail Address</b>	stefano@iatsea.co.za
<b>Website</b>	www.incentivesatsea.co.za

#### **4. SECTION 10 GUIDE ON HOW TO USE THE ACT [Sec 51(1)(b)]**

- 4.1. In terms of Section 10 of PAIA, the Information regulator has compiled, in each official language, a guide to PAIA to assist people exercising their rights under PAIA.
- 4.2. The guide is available from the Information Regulator. To receive a copy of the guide please direct any queries to:

##### **The Information Regulator**

<b>Postal address:</b>	P.O Box 31533, Braamfontein, Johannesburg
<b>Physical address:</b>	27 Stiemens St, Braamfontein, Johannesburg, 0001
<b>Telephone:</b>	<a href="tel:010 023 5200">010 023 5200</a>
<b>Website:</b>	<a href="http://www.inforegulator.org.za">www.inforegulator.org.za</a>
<b>Email:</b>	<a href="mailto:enquiries@inforegulator.org.za">enquiries@inforegulator.org.za</a>

#### **5. AUTOMATICALLY AVAILABLE INFORMATION**

- 5.1. The web page [www.incentivesatsea.co.za](http://www.incentivesatsea.co.za) is accessible to anyone who has access to the Internet. The **Incentives At Sea And Beyond (PTY) LTD** website hosts the following categories of information. This information does not need to be requested in terms of PAIA.

#### **6. CATEGORIES OF RECORDS AVAILABLE WITHOUT A PERSON HAVING TO**

##### **REQUEST ACCESS IN TERMS OF PAIA**

- 6.1. This is limited to any information that is already available to the public, including but not limited to any information held by the Companies and Intellectual Property Commission, the Deeds Offices, and on the internet.

#### **7. RECORDS MAINTAINED PER OTHER LEGISLATION [Sec 51(1)(d)]**

- 7.1. Where applicable to our operations, information is also kept and maintained per the following legislation, including but not limited to:
- 7.1.1. Basic Conditions of Employment Act No.75 of 1997
  - 7.1.2. Board Based Black Economic Empowerment Act No. 53 of 2003
  - 7.1.3. Compensation for Occupational Injuries and Diseases Act No. 130 of 1993
  - 7.1.4. Collective Investment Schemes Control Act No. 45 of 2002
  - 7.1.5. Companies Act No. 71 of 2008

- 7.1.6. Consumer Protection Act No. 68 of 2008
- 7.1.7. Copyright Act No. 98 of 1987
- 7.1.8. Deeds Registries Act No. 47 of 1937
- 7.1.9. Electronic Communications and Transactions Act No. 25 of 2002
- 7.1.10. Employment Equity Act No. 55 of 1998
- 7.1.11. Financial Intelligence Centre Act No. 38 of 2001
- 7.1.12. Financial Markets Act No. 19 of 2012
- 7.1.13. Income Tax Act No. 58 of 1962
- 7.1.14. Labour Relations Act No. 66 of 1995
- 7.1.15. Long Term Insurance Act No. 52 of 1998
- 7.1.16. Medical Schemes Act No. 131 of 1998
- 7.1.17. National Credit Act No. 34 of 2005
- 7.1.18. Occupational Health and Safety Act No. 85 of 1993
- 7.1.19. Patents Act No. 57 of 1987
- 7.1.20. Pension Funds Act No. 24 of 1956
- 7.1.21. Promotion of Access to Information Act No.2 of 2000
- 7.1.22. Promotion of Equality and Prevention of Unfair Discrimination Act No. 4 of 2000
- 7.1.23. Protected Disclosures Act No. 26 of 2000
- 7.1.24. Protection of Personal Information Act No.4 of 2013
- 7.1.25. Regulation of Interception of Communications and Provisions of Communication Related Information Act No. 70 of 2002
- 7.1.26. Safety at Sports and Recreational Events Act No. 2 of 2010
- 7.1.27. Short Term Insurance Act No. 53 of 1998
- 7.1.28. Skills Development Levies Act No. 9 of 1999
- 7.1.29. South African Revenue Services Act No. 34 of 1997
- 7.1.30. South African Reserve Bank Act No. 90 of 1989
- 7.1.31. Unemployment Insurance Act No. 63 of 2001
- 7.1.32. Value Added Tax Act No. 89 of 1991.

**8. SUBJECT AND CATEGORIES OF RECORDS HELD BY Incentives At Sea And Beyond (PTY) LTD: SECTION 51(1)(e)**

8.1. **Incentives At Sea And Beyond (PTY) LTD** maintains the following categories of records and related subject matter. The status of the record's availability, the purpose for its processing and the relevant data subject category to who the record relates are set out below.

Access to these records may be protected by professional privilege, confidentiality, privacy grounds and/or other reasonable grounds of refusal as set out in this Manual.

Category	Record	Availability	Purpose	Data Subject
<b>Human Resources</b>	Employment applications	PAIA Request	Internal Referencing	Employees
	Employment Contracts	PAIA Request	Contractual Agreement	
	Employee information of (take-on forms)	PAIA Request	Contractual Agreement	
	Employment Equity Reports and Skills Plan	PAIA Request	Statutory Requirement	Organisation
	Medical Aid Records	PAIA Request	Internal Referencing	Employees
	Pension / Provident Fund Records	PAIA Request	Internal Referencing	
	Disciplinary and CCMA Records	PAIA Request	Statutory Requirement	
	Performance Management Records	PAIA Request	Internal Referencing	
	Payroll and Salary Records	PAIA Request	Internal Referencing	
	Employee Benefit Records	PAIA Request	Internal Referencing	
	PAYE Records	PAIA Request	Statutory Requirement	
	SETA Records	PAIA Request	Statutory Requirement	Employees
	Disciplinary Code	PAIA Request	Statutory Requirement	
	Leave Records	PAIA Request	Internal Referencing	
	Training Records	PAIA Request	Internal Referencing	
	Loan and Bursary Agreements	PAIA Request	Internal Referencing	Employees
Recruitment and other HR policies	PAIA Request	Internal Referencing		
	Annual financial returns	PAIA Request	Statutory Requirement	Organisation

<b>Financial Information</b>	Management Accounts and Reports	PAIA Request	Statutory Requirement	
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	Asset register	PAIA Request	Internal Referencing	
	Tax returns	PAIA Request	Statutory Requirement	
	Accounting records and Annual Reports	PAIA Request	Statutory Requirement	
	Bank statements and reconciliations	PAIA Request	Internal Referencing	
	Cheques paid	PAIA Request	Internal Referencing	
	Invoices	PAIA Request	Internal Referencing	
	PAYE records	PAIA Request	Statutory Requirement	Employees
	IRP5 records	PAIA Request	Statutory Requirement	
	UIF contribution records	PAIA Request	Statutory Requirement	
	Records of payments to SARS on behalf of employees	PAIA Request	Statutory Requirement	
<b>Regulatory &amp; Administrative</b>	Permits, Licenses or Authorities	Freely Available	Statutory Requirement	Organisation
	FICA and other legislative policies and plans	PAIA Request	Statutory Requirement	
	Memorandum of Incorporation	Freely Available	Statutory Requirement	
	Meeting minutes	PAIA Request	Statutory Requirement	
	Register of Board of Directors	PAIA Request	Statutory Requirement	
	Share Register	PAIA Request	Statutory Requirement	Shareholders / Organisation
	Internal correspondence (emails/memos)	PAIA Request	Internal Communications	Employees
	Insurance Policies	PAIA Request	Risk Management	
	Policies, Procedures, and codes of conduct	PAIA Request	Internal Referencing	Organisation
	Records about fixed and movable assets	PAIA Request	Internal Referencing	
	Training records	PAIA Request	Statutory Requirement	Organisation
	Further records required to be kept in terms of the Companies Act 71 of 2008	PAIA Request	Statutory Requirement	Organisation
	Record of Processing Activities in terms of POPIA.	PAIA Request	Statutory Requirement	Organisation



<b>Sales and Marketing</b>	Customer lists	PAIA Request	Legitimate interest	Customer
	Customer agreements	PAIA Request	Statutory Requirement	
	Customer records	PAIA Request	Contractual Agreement	
	Customer instructions	PAIA Request	Statutory Requirement	
	Customer correspondence	PAIA Request	Statutory Requirement	
	Sales / Subscriptions / Transactions concluded by customers.	PAIA Request	Statutory Requirement	
	Statements of account	PAIA Request	Statutory Requirement	
<b>Operations</b>	Archival Admin documentation	PAIA Request	Statutory Requirement	Organisation
	Vehicle registration documents	PAIA Request	Statutory Requirement	Third-Party
	Rental agreements	PAIA Request	Contractual Agreement	
	Contracts and legal agreements	PAIA Request	Contractual Agreement / legitimate interest	
	Joint venture agreements	PAIA Request	Contractual Agreement	
	Non-disclosure agreements	PAIA Request	Risk Management / legitimate interest	
	Letters of Intent	PAIA Request	Contractual Agreement	
	Service Level Agreements	PAIA Request	Contractual Agreement	
<b>Information technology</b>	Hardware	PAIA Request	Risk Management / legitimate interest	Organisation / Suppliers
	Software packages and licenses	PAIA Request	Contractual Agreement	Organisation / Suppliers
	IT policies and operating procedures	PAIA Request	Risk Management / legitimate interest	Organisation
<b>Corporate Travel</b>	Travel agent invoices, foreign exchange orders, vehicle and travel insurance declarations	PAIA Request	Contractual Agreement	Employee / Third Party
	Corporate agreements with airlines, hotels, vehicle rental companies	PAIA Request	Contractual Agreement	
	Cell phone contracts	PAIA Request	Contractual Agreement	

## 9. ACCESS REQUEST PROCEDURES

### 9.1. Request for Official Information

- 9.1.1. Requests for **Incentives At Sea And Beyond (PTY) LTD** official information should be addressed in writing to the Information Officer of Cullinan at an address in paragraph 3 above.
- 9.1.2. Requests should be made using the prescribed PAIA Form attached hereto and include the reason why the information is sought.
- 9.1.3. If a request is refused, the applicant will be told the reason for the refusal.
- 9.1.4. A request must be answered within thirty (30) days after the request has been received.
- 9.1.5. A requestor may ask that the request be treated as urgent, but reasons should be provided for seeking urgency.
- 9.1.6. The time limit for answering requests can be extended in some cases, but the applicant will be advised of the refusal and the reasons for it. For example, an extension may be required where:
  - 9.1.6.1. the request is for a large number of records;
  - 9.1.6.2. the search for the records is to be conducted at premises not situated in the same town or city as the head office of **Incentives At Sea And Beyond (PTY) LTD**;
  - 9.1.6.3. consultation among divisions or departments, as the case may be, of **Incentives At Sea And Beyond (PTY) LTD** is required;
  - 9.1.6.4. the parties agree in any manner to such an extension.
  - 9.1.6.5. Most requests will be answered without a charge but should **Incentives At Sea And Beyond (PTY) LTD** incur any costs in retrieving the information or have to make photocopies, a nominal fee will be charged which fee will be determined by the Board.
  - 9.1.6.6. **Incentives At Sea And Beyond (PTY) LTD** will endeavour to provide the information in the form requested, unless to do so will impair efficient administration, be contrary to a legal duty or prejudice the interests that are protected by withholding for example:
    - 9.1.6.7. reasonable opportunity to inspect the document;
    - 9.1.6.8. provide a copy of the document;
    - 9.1.6.9. making arrangements for the person to hear or view any relevant sounds or images;
    - 9.1.6.10. transcript, excerpt, summary or oral information concerning words recorded or in a document;
    - 9.1.6.11. provide with deletions or alterations as are necessary to protect the interests protected by withholding grounds.
- 9.1.7. If the head of **Incentives At Sea And Beyond (PTY) LTD** or the Information Officer fails to respond within thirty days after a request has been received, the request is deemed to be refused in terms of section 58 read together with section 56(1) of PAIA.

9.1.8. The requester may lodge an appeal with a court of competent jurisdiction against any extension or any procedure set out in this section.

## **10. PRESCRIBED FEES: SECTION 51(1)(f)**

- 10.1. The requestor must pay the non-refundable, prescribed request fee of R50.00 (Fifty Rand) to be submitted together with the completed Form to **Incentives At Sea And Beyond (PTY) LTD**. Should the request for access to information be approved, further fees will be payable per the provisions of PAIA and these fees will be made known to the requester by the Information Officer.
- 10.2. Access to information, if approved, will only be provided once all the prescribed fees have been paid.
- 10.3. In terms of POPIA, a data subject has the right to request **Incentives At Sea And Beyond (PTY) LTD** to confirm, free of charge, whether or not it holds personal information about the data subject.

## **11. REASONS FOR REFUSAL**

- 11.1. **Incentives At Sea And Beyond (PTY) LTD** may neither confirm nor deny the existence or nonexistence of the information requested to protect an interest identified as a conclusive reason to withhold information or to protect trade secrets or the commercial position of the person who supplied the information or is the subject of the information.
- 11.2. **Incentives At Sea And Beyond (PTY) LTD** may also refuse to provide information if:
  - 11.2.1. the making available of the information would be contrary to the provisions of specific legislation;
  - 11.2.2. the information requested is or will soon be publicly available;
  - 11.2.3. the document alleged to contain the information requested does not exist or cannot be found;
  - 11.2.4. the information requested is not held and the person dealing with the request has no grounds for believing that the information is either held or more closely connected with the functions of **Incentives At Sea And Beyond (PTY) LTD**;
  - 11.2.5. the request is frivolous or vexatious or that the information requested is trivial;
  - 11.2.6. the information contains protected copyright;
  - 11.2.7. disclosure of the information would involve the unreasonable disclosure of personal information or special personal information in terms of POPIA (privacy); and/or
  - 11.2.8. the information is confidential or protected by privilege.

## **12. GOOD REASONS FOR WITHHOLDING INFORMATION**

- 12.1. Information may be withheld where:
- 12.1.1. the giving might prejudice the security and shareholder or customer relations of **Incentives At Sea And Beyond (PTY) LTD**;
  - 12.1.2. the giving of the information might endanger an employee or shareholder or customer's safety;
  - 12.1.3. to protect the privacy of natural persons who may be third parties, employees or shareholders or customers;
  - 12.1.4. to protect trade secrets or the commercial position of **Incentives At Sea And Beyond (PTY) LTD** or the person who supplied or who is the subject of the information;
  - 12.1.5. to protect the confidential information which, if released, would prejudice the supply of such similar information or damage the public interest;
  - 12.1.6. to protect the substantial economic interests of **Incentives At Sea And Beyond (PTY) LTD**; or
  - 12.1.7. where information is protected by legal or litigation privilege.

**NOTE:** *It is important to note that access is not automatic. An application for access to information can be refused at the reasonable discretion of the Information Officer, including but not limited to the reasons in this Manual and if the application does not comply with the procedural requirements. If it is reasonably suspected that the requester has obtained access to the records through the submission of materially false or misleading information, legal proceedings may be instituted against such requester.*

## **13. INFORMATION OR RECORDS NOT FOUND**

- 13.1. If all reasonable steps have been taken to find a record, and such a record cannot be found or if the records do not exist, then the head of **Incentives At Sea And Beyond (PTY) LTD** or the request liaison officer shall notify the requester, by way of an affidavit or affirmation, that it is not possible to give access to the requested record. This notice shall be considered as a deemed refusal for purposes of PAIA.
- 13.2. The affidavit or affirmation shall provide a full account of all the steps taken to find the record or to determine its existence.
- 13.3. If the record in question should later be found, the requester shall be given access to the record in the manner stipulated by the requester in the prescribed form unless access is refused.

## **14. INFORMATION REQUESTED ABOUT A THIRD PARTY**

- 14.1. Section 71 of PAIA makes provision for a request for information or records about a third party.
- 14.2. When considering such requests, **Incentives At Sea And Beyond (PTY) LTD** will adhere to the provisions of sections 71 to 74 of PAIA.
- 14.3. In certain circumstances, **Incentives At Sea And Beyond (PTY) LTD** may be obliged in terms of PAIA to advise third parties of such requests lodged, and the relevant third party(ies) may be entitled to dispute the decision by the Information Officer by referring the matter to a competent court of law.

## **15. RECORD OF PROCESSING ACTIVITIES**

- 15.1. Following POPIA, we maintain a detailed record of our processing activities as part of our internal data register.

## **16. CATEGORIES OF DATA SUBJECTS**

- 16.1. **Incentives At Sea And Beyond (PTY) LTD** holds information and records on the following categories of data subjects:
- Employees of **Incentives At Sea And Beyond (PTY) LTD**;
  - Family members of employees, including children where permitted;
  - Clients (including potential and previous clients) of **Incentives At Sea And Beyond (PTY) LTD**
  - Suppliers and service providers of **Incentives At Sea And Beyond (PTY) LTD**;
  - Shareholders and directors of **Incentives At Sea And Beyond (PTY) LTD**;
  - Visitors.
- 16.2. In terms of POPIA, Personal Information must be processed for a specified purpose. The purpose for which Personal Information is processed by **Incentives At Sea And Beyond (PTY) LTD** will depend on the nature of the Personal Information and the particular data subject. **Incentives At Sea And Beyond (PTY) LTD** maintains separate privacy notices that incorporate the purposes for processing. These notices are made available on **Incentives At Sea And Beyond (PTY) LTD** website or directly to the data subject. However, our typical purposes are summarised below and are non-exhaustive.

### **Purpose of processing**

#### **16.2.1. Employee's Personal Information**

**Incentives At Sea And Beyond (PTY) LTD** processes its employees' (including prospective, existing and previous) Personal Information for business administration purposes. For example, training, payroll and leave management. Employee Personal Information is also processed to the extent required by legislation. For example, **Incentives At Sea And Beyond (PTY) LTD** discloses its employees' financial information to the Commissioner for the South African Revenue Service, in terms of the Income Tax Act 58 of 1962 and certain special personal information in terms of the Employment Equity Act 55 of 1998.

## 16.2.2. Clients' Personal Information

**Incentives At Sea And Beyond (PTY) LTD** processes client (including potential and previous clients) related records as an integral part of its commercial services. For example, **Incentives At Sea And Beyond (PTY) LTD** processes client related records during the client application process, and for **Incentives At Sea And Beyond (PTY) LTD** to perform its obligations in terms of its relevant client service level agreement. **Incentives At Sea And Beyond (PTY) LTD** may also process Personal Information provided to it by credit bureaus or industry regulatory bodies where permitted by law.

## 16.2.3. Suppliers' and service providers' Personal Information

**Incentives At Sea And Beyond (PTY) LTD** processes supplier and service provider related Personal Information to perform its obligations in terms of its relevant service level agreements, including to make payment, and to comply with its legal obligations in terms of the Financial Intelligence Centre Act 38 of 2001 and Companies Act 71 of 2008, among others.

## 17. RECIPIENTS TO WHOM PERSONAL INFORMATION MAY BE SUPPLIED

17.1. **Incentives At Sea And Beyond (PTY) LTD** may share the Personal Information of its data subjects, where legally justified to do so, for any of the purposes outlined in its privacy notices, with the following parties (among others):

17.1.1. Other companies forming part of the **Incentives At Sea And Beyond (PTY) LTD** group listed in paragraph 1.1 of this Manual.

17.1.2. **Incentives At Sea And Beyond (PTY) LTD** service providers, operators (suppliers and third parties) that perform services on its behalf.

17.1.3. **Incentives At Sea And Beyond (PTY) LTD** does not share Personal Information with any third parties, except if:

- it is obliged to provide such information for legal or regulatory purposes;
- it is required to do so for purposes of existing or future legal proceedings;
- it is selling one or more of its businesses or part of its businesses to a third party to whom it may transfer its rights under any agreement it may have with data subjects;
- it is involved in the prevention of fraud, loss, bribery or corruption;
- the third party performs services and processes Personal Information on **Incentives At Sea And Beyond (PTY) LTD** behalf as its operator;
- this is required to provide or manage any information, products and/or services to data subjects;
- or this is needed to help **Incentives At Sea And Beyond (PTY) LTD** improve the quality of its products and services.

17.2. **Incentives At Sea And Beyond (PTY) LTD** will send its data subjects appropriate notifications or communications of its processing if it is obliged to do so by law, or in terms of its contractual relationship with such data subjects.

17.3. **Incentives At Sea And Beyond (PTY) LTD** will only disclose Personal Information to government authorities if it is required to do so by law.

17.4. **Incentives At Sea And Beyond (PTY) LTD** employees and suppliers are required to adhere to legislation relating to privacy and confidentiality principles, and to complete privacy training.

## **18. CROSS-BORDER FLOW OF INFORMATION**

18.1. **Incentives At Sea And Beyond (PTY) LTD** will only transfer Personal Information outside of South Africa if the relevant transactions or situation requires cross-border processing. It will only do so in accordance with South African legislative requirements, or if the data subject consents to the transfer of their Personal Information to third parties in foreign countries.

18.2. **Incentives At Sea And Beyond (PTY) LTD** will also take steps to ensure that operators (suppliers and third parties) in foreign countries are bound by laws, binding corporate rules or binding agreements that provide an adequate level of protection of Personal Information in terms of POPIA, unless otherwise permitted by Section 72(1) of POPIA.

## **19. OBJECTION TO THE PROCESSING OF PERSONAL INFORMATION**

19.1. You may, at any time object to the Processing of your Personal Information in the prescribed form attached as Annexure 3 to this Manual. However, **Incentives At Sea And Beyond (PTY) LTD** may be lawfully entitled to continue processing your personal information in the limited circumstances permitted by POPIA, including where such processing is required by law, protects a legitimate interest or is required to perform our obligations in terms of a contract with you.

## **20. REQUEST FOR CORRECTION OR DELETION OF PERSONAL INFORMATION**

20.1. Subject to the exceptions already stated in 19.1 above, you may request for your Personal Information to be corrected/deleted in the prescribed form attached to this Manual as Annexure 4.

## **21. GENERAL DESCRIPTION OF INFORMATION SECURITY MEASURES**

21.1. **Incentives At Sea And Beyond (PTY) LTD** uses technical and organisational measures detailed in its data protection policies to ensure the confidentiality, integrity and protection of the Personal Information under its control.

21.2. These measures include, among others:

21.2.1. physical access control;

21.2.2. firewalls;

21.2.3. secure networks;

21.2.4. virus protection software and update protocols;

21.2.5. backup protocols;

21.2.6. organisational measures and training; and

21.2.7. any outsourced service providers who process personal information on behalf of **Incentives At Sea And Beyond (PTY) LTD** are contracted to implement appropriate security controls.

## **22. DESCRIPTION OF REMEDIES AVAILABLE IN RESPECT OF AN ACT OR FAILURE**

### **TO ACT BY INCENTIVES AT SEA AND BEYOND (PTY) LTD**

22.1. If **Incentives At Sea And Beyond (PTY) LTD** refuses a request for information in terms of PAIA, the requester may, within 60 days, in the prescribed form and against payment of the prescribed appeal fee, lodge an internal appeal against the decision of the Information Officer in accordance with the provisions of section 75 of PAIA.

## **23. AVAILABILITY OF THIS MANUAL**

23.1. This Manual is available for inspection at the offices of **Incentives At Sea And Beyond (PTY) LTD** at no cost. A copy of this Manual may be made available on **Incentives At Sea And Beyond (PTY) LTD** website.

<b>Name of Executive Head</b> (initialled each page)	Stefano Oroni
<b>Signature</b>	<i>Stefano Oroni</i>
<b>Date</b>	2024 / 06 / 14
<b>Name of Information Officer</b> (initialled each page)	Stefano Oroni
<b>Signature</b>	<i>Stefano Oroni</i>
<b>Date</b>	2024 / 06 / 14