



Kuyimba Trading (Pty) Limited
(Registration Number: 2012/098421/07)

MANUAL

Published in terms of section 51 of the
Promotion of Access to Information Act 2 of 2000

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1 Introduction

Kuyimba Trading (Pty) Limited (the “Company” or “Kuyimba”), conducts business as a safari tour operator, selling to customers both directly and via third-party agents.

This Promotion of Access to Information Manual (“Manual”) provides an outline of the type of records and the personal information it holds and explains how to submit requests for access to these records in terms of the Promotion of Access to Information Act 2 of 2000 (“PAIA Act”). In addition, it explains how to access, or object to, personal information held by the Company, or request correction of the personal information, in terms of paragraphs 23 and 24 of the Protection of Personal Information Act 4 of 2013 (“POPI Act”).

The PAIA and POPI Acts give effect to everyone’s constitutional right of access to information held by private sector or public bodies, if the record or personal information is required for the exercise or protection of any rights. If a public body lodges a request, the public body must be acting in the public interest. Requests shall be made in accordance with the prescribed procedures, at the rates provided. The forms and tariff are dealt with in section 5.

1.1 Availability of this PAIA Manual

This manual is published on the Company website at <http://www.kuyimba.com> or alternatively, a copy can be requested from the Information Officer at Kuyimba Trading (see contact details in section 2).

1.2 Availability of guides to the PAIA and POPI Acts

Guides to the PAIA and POPI Acts can be obtained and queries directed to:

PAIA Act	POPI Act
South African Human Rights Commission Information Regulator Promotion of Access to Information Act Unit Research and Documentation Department	Information Regulator
PAIA Act	POPI Act
29 Princess of Wales Terrace Corner York and St Andrews Street Parktown Johannesburg 2193	Woodmead North Office Park 54 Maxwell Drive Woodmead Johannesburg, 2191
Phone: (011) 484 8300 Fax number: (011) 484 7146/7 Website : www.sahrc.org.za E-mail : PAIA@sahrc.org.za	Phone: 010 023 5200 0800 017 160 Website: www.inforegulator.org.za E-mail : enquiries@inforegulator.org.za

2 Company contact details

Company contact details in terms of PAIA section 51:

Kuyimba Trading (Pty) Limited
P.O. Box 1254
Hoedspruit
1380

254 Raptor's View Wildlife Estate
Hoedspruit
Limpopo
1380
Telephone number: 015 793 0997
Website : www.kuyimba.com

Duly authorised persons:
Information Officer
Sarah Solomon
E-mail: info@kuyimba.com

3 Company records

3.1 Company records availability

Departmental records	Subject	Classification no.
Health, Safety and Environmental Department	Health & Safety Records	1,2,5
Financial Division	Audited Financial Statements	7
	Tax Records (Company & Employees)	1,7
	Asset Register	7
	Supplier Records	1,2,3
	Management Accounts	7
	Insurance Policies	1,2
Legal Services & Compliance Division	General Contract Documentation	3,7
	Company Guidelines, Policies and Procedures	7
	Customer and supplier information	6
	Statutory Records	7
Sales and Marketing Division	Market Information	7
	Marketing and Future Campaign Strategies	7
	Customer Information and Database	1,2,7

3.2 Company record classification key:

Classification No.	Access	Classification (PAIA section)
1	Limited Disclosure	Personal Information of natural persons that belongs to the requester of that information, or personal information of juristic persons represented by the requestor of that information [s61]
2	May not be Disclosed	Unreasonable disclosure of personal information or of Natural person [s63(1)] or Juristic Person [POPI]
3	May not be Disclosed	Likely to harm the commercial or financial interests of third party [s64(a)(b)]
4	May not be Disclosed	Would breach a duty of confidence owed to a third party in terms of an Agreement [s65]
5	May not be Disclosed	Likely to compromise the safety of individuals or protection of property [s66]
6	May not be Disclosed	Legally privileged document [s67]
7	May not be Disclosed	Commercial information of Private Body [s68]

4 Processing of personal information

Kuyimba Trading takes the privacy and protection of personal information very seriously and will only process personal information in accordance with the current South African privacy. Accordingly, the relevant personal information privacy principles relating to the processing thereof (including, but not limited to, the collection, handling, transfer, sharing, correction, storage, archiving and deletion) will be applied to any personal information processed by Kuyimba Trading.

4.1 The purpose of processing of personal information by Kuyimba Trading

We process personal information for a variety of purposes, including but not limited to the following:

- to provide or manage any information, products and/or services requested by data subjects;
- to help us identify data subjects when they contact Kuyimba Trading;
- to maintain customer records;
- for general administration, financial and tax purposes;
- for legal or contractual purposes;
- for health and safety purposes;
- to transact with our suppliers and business partners;
- to help us improve the quality of our products and services;
- to help us detect and prevent fraud and money laundering;
- to help us recover debts;
- to carry out analysis and customer profiling; and
- to identify other products and services which might be of interest to data subjects and to inform them about our products and services.

4.2 Categories of data subjects and personal information processed by Kuyimba Trading

Categories of data subjects and personal information processed by Kuyimba trading include the following:

Customers and potential customers	Customer personal information, including medical information for processing of travel documentation. Location information
Children	Child customer personal information, including medical information for processing of travel documentation.
Suppliers	Suppliers' business, personal and location information .

4.3 Recipients or categories of recipients with whom personal information is shared

We may share the personal information of our data subjects for any of the purposes outlined in Section 4.1, with:

- our service providers and agents who perform services on our behalf.

We do not share the personal information of our data subjects with any third parties, except if:

- we are obliged to provide such information for legal or regulatory purposes;
- we are required to do so for purposes of existing or future legal proceedings,
- we are involved in the prevention of fraud, loss, bribery or corruption;
- they perform services and process personal information on our behalf;
- this is required to provide or manage any information, products and/or services to data subjects; or
- is needed to help us improve the quality of our products and services.

We will send our data subjects notifications or communications if we are obliged by law, or in terms of our contractual relationship with them.

We will only disclose personal information to government authorities if we are required to do so by law.

Our agencies and our suppliers are required to adhere to data privacy and confidentiality principles and to attend data privacy training.

4.4 Information security measures to protect personal information

Reasonable technical and organisational measures have been implemented for the protection of personal information processed by Kuyimba Trading and its operators.

In terms of the PoPI Act, operators are third parties that process personal information on behalf of Kuyimba Trading.

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 Kuyimba Trading apply adequate safeguards as outlined above.

4.5 Trans-border flows of personal information

We transfer personal information across South African borders if the relevant business transactions or situation requires trans-border processing and will do so only in accordance with South African legislative requirements.

We will take steps to ensure that operators are bound by laws, binding corporate rules or binding agreements that provide an adequate level of protection and uphold principles for reasonable and lawful processing of personal information, in terms of the PoPI Act.

We will take steps to ensure that operators that process personal information in jurisdictions outside of South Africa, apply adequate safeguards as outlined in Section 4.4.

4.6 Personal information received from third parties

When we receive personal information from a third party on behalf of a data subject, we require confirmation that they have written consent from the data subject that they are aware of the contents of this PAIA manual and the Kuyimba Trading Privacy Policy, and do not have any objection to our processing their information in accordance with this policy.

5 Prescribed request forms and fees

5.1 Form of request

To facilitate the processing of your request, kindly:

Provide sufficient detail to enable the Company to identify:

- a. The record(s) requested.
- b. The requestor (and, if an agent is lodging the request, proof of capacity).
- c. The postal address, email address or fax number of the requestor.
- d. The form of access required.
- e. The postal address, email address or fax number of the requestor.
- f. If the requester wishes to be informed of the decision in any manner (in addition to written) the manner and particulars thereof.
- g. The right which the requestor is seeking to exercise or protect with an explanation of the reason the record is required to exercise or protect the right.

5.2 Prescribed fees

The following applies to requests:

A requestor is required to pay the prescribed fees (R50.00) before a request will be processed.

If the preparation of the record requested requires more than the prescribed hours (six), a deposit shall be paid (of not more than one third of the access fee which would be payable if the request were granted).

A requestor may lodge an application with a court against the tender/payment of the request fee and/or deposit.

Records may be withheld until the fees have been paid.

6 Remedies

The company does not have internal appeal procedures regarding PAIA and POPI Act requests.

As such, the decision made by the duly authorised persons in section 2, is final.

If a request is denied, the requestor is entitled to apply to a court with appropriate jurisdiction, or the Information Regulator, for relief.