

TRAVEL WITH FLAIR (PTY) LTD

Registration Number: 1996/011361/07

PAIA MANUAL

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

DOCUMENT CONTROL

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1. LIST OF ACRONYMS AND ABBREVIATIONS

CEO	– Chief Executive Officer
COO	– Chief Operating Officer
IO	– Information Officer
DIO	– Deputy Information Officer
TWF	– Travel with Flair (Pty) Ltd
PAIA	– Promotion of Access to Information Act 2 of 2000
POPIA	– Protection of Personal Information Act 4 of 2013
PFMA	– Public Finance Management Act 1 of 1999
SARS	– South African Revenue Service
IMS	– Integrated Management System
Regulator	– Information Regulator of South Africa

2. PURPOSE OF THIS PAIA MANUAL

No.	Item	Description
2.1	Records available without request	Enable requesters to understand how to request access to records held by TWF;
2.2	Request process	Identify categories of records available without formal request;
2.3	Records available under other legislation	Outline records requiring formal PAIA request procedures;
2.4	Contact details	Provide contact details of Information Officers;
2.5	PAIA Guide	Explain rights of access under PAIA and POPIA.
2.6	Processing of personal information	Confirm how personal information is processed and protected.
2.7	Categories of data subjects	Outline categories of data subjects and processing purposes;
2.8	Recipients of personal information	Indicate potential recipients of personal information;
2.9	Cross-border transfers	Explain cross-border data transfer principles.
2.10	Security measures	Confirm security safeguards applied to personal information.

3. KEY CONTACT DETAILS FOR ACCESS TO INFORMATION OF TRAVEL WITH FLAIR (Pty) Ltd

3.1	Chief Information Officer	: Khalil Satter
	Designation	: Chief Operating Officer
	Telephone Number/s	: (012) 424 3300 0860 777 747
	Fax Number	: (012) 460 6747
	Email	: khalils@twf.co.za
3.2	Deputy Information Officer	: Eugene Venter
	Designation	: Chief IT & Business Systems
	Telephone Number/s	012) 424 3300 0860 777 747
	Fax Number	012) 460 6747
	Email	: eugenev@twf.co.za

3.3 Admin Officers:

Admin Officer	Position	Contact Number	Email
Cathy Koele	Chief Sales Officer Public Sector	012 424 3300	cathyk@twf.co.za
Manus de Vos	Chief Financial Officer	012 424 3300	manusdv@twf.co.za
Ulene Mitchell	Chief Human Capital Officer	012 424 3300	ulenem@twf.co.za
Caiphus Nthambeleni	Chief Government & Public Entities	012 424 3300	CaiphusN@twf.co.za
Tania Augustyn	Chief Officer Mice, Outbound & Inbound	012 424 3300	TaniaA@twf.co.za
Sibusiso Nkosi	Chief Officer Operational Finance	012 424 3300	SibusisoN@twf.co.za
Philip Markgraaf	HR Officer	012 424 3300	PhilipM@twf.co.za

3.4 Access to Information of General Contacts:

Email: info@twf.co.za

3.5. Travel with Flair (Pty) Ltd Contact Details – Head Office

Item	Description
Company Name	Travel with Flair (Pty) Ltd
Registration Number	1996/011361/07
Physical Address	Landmark East Building, 17 Umgazi Road, Menlo Park, Pretoria, 0081
Postal Address	Private Bag 11291, Maroelana, Pretoria, 0161
Telephone	(012) 424 3300 0860 777 747
Fax	(012) 460 6747
Email	info@twf.co.za
Website	www.travelwithflair.co.za
Nature of Business	The provision of corporate travel solutions, i.e. corporate travel, (land, air, ocean), conferences and events. This is supported by marketing, sales, and supply chain services, IT, HR, procurement, facility management and finance.

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

- 4.1. The Regulator has, in terms of section 10(1) of PAIA, as amended, updated and made available the revised Guide on how to use PAIA (“Guide”), in an easily comprehensible form and manner, as may reasonably be required by a person who wishes to exercise any right contemplated in PAIA and POPIA.
- 4.2. The Guide is available in each of the official languages and in braille.
- 4.3. The aforesaid Guide contains the description of-
 - 4.3.1. the objects of PAIA and POPIA;
 - 4.3.2. the postal and street address, phone and fax number and, if available, electronic mail address of-
 - 4.3.2.1. the Information Officer of every public body, and
 - 4.3.2.2. every Deputy Information Officer of every public and private body designated in terms of section 17(1) of PAIA1 and section 56 of POPIA2;
 - 4.3.3. the manner and form of a request for-
 - 4.3.3.1. access to a record of a public body contemplated in section 113; and

- 4.3.3.2. access to a record of a private body contemplated in section 504;
- 4.3.4. the assistance available from the IO of a public body in terms of PAIA and POPIA;
- 4.3.5. the assistance available from the Regulator in terms of PAIA and POPIA;
- 4.3.6. all remedies in law available regarding an act or failure to act in respect of a right or duty conferred or imposed by PAIA and POPIA, including the manner of lodging-

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

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

3 Section 11(1) of PAIA- A requester must be given access to a record of a public body if that requester complies with all the procedural requirements in PAIA relating to a request for access to that record; and access to that record is not refused in terms of

any ground for refusal contemplated in Chapter 4 of this Part.

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.

- 4.3.6.1. an internal appeal;
- 4.3.6.2. a complaint to the Regulator; and
- 4.3.6.3. an application with a court against a decision by the information officer of a public body, a decision on internal appeal or a decision by the Regulator or a decision of the head of a private body;
- 4.3.7. the provisions of sections 145 and 516 requiring a public body and private body, respectively, to compile a manual, and how to obtain access to a manual;
- 4.3.8. the provisions of sections 157 and 528 providing for the voluntary disclosure of categories of records by a public body and private body, respectively;
- 4.3.9. the notices issued in terms of sections 229 and 5410 regarding fees to be paid in relation to requests for access; and
- 4.3.10. the regulations made in terms of section 9211.

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

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

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.”

- 4.4. Members of the public can inspect or make copies of the Guide from the offices of the public and private bodies, including the office of the Regulator, during normal working hours.

- 4.5. The Guide can also be obtained-
 - 4.5.1. upon request to the Information Officer;
 - 4.5.2. from the website of the Regulator (<https://www.justice.gov.za/infoereg/>).
- 4.6 A copy of the Guide is also available in the following two official languages, for public inspection during normal office hours-

4.6.1 PAIA MANUAL AVAILABLE IN THE FOLLOWING TWO OFFICIAL LANGUAGES

- English, and Sesotho

5. CATEGORIES OF RECORDS OF TRAVEL WITH FLAIR WHICH ARE AVAILABLE WITHOUT A PERSON HAVING TO REQUEST ACCESS (Section 51 (1) (d) Website www.travelwithflair.co.za)

(Retention: As long as current + 3 years archive)

- Company profile
- Marketing material
- Website information
- Services, tools, booking platforms
- Policies (PAIA, Privacy, Terms)
- Supplier & partner information
- Published reports
- General brochures - News, media, and publications
- Legislation & B-BBEE Certification
- TWF Terms and Conditions (pdf)
- TWF Privacy Policy (pdf)
- PAIA-Manual (pdf)
- IMS-POLICY (pdf)
- BBBEE Certification 2025 (pdf)

Functions	Records
Home	Corporate Travel MICE Management Incentive Travel AV8R online self-booking tool – end to end solution Adding value to your enterprise revenue Smart, simplified, fully automated workflow World-class traveller experience Why Choose TWF? The Benefits of Partnering with TWF Discover TWF Corporate Travel Strategic Guidance and Expertise Performance Insights and Analytics Mobile Travel Assistant Profile Manager Trip Manager Expense Manager Approval Manager
About us	Director’s information Strategic “Dream” Team Information Clients Discover the World with TWF Corporate travel - Find out more Accreditation Legislation & B-BBEE Certification: Terms and Conditions TWF Privacy Policy’ PAIA Manual IMS Policy BBBEE Certification 2025
Travel Tools	Airport Lounge Access Online Check-in

Functions	Records
	Travel Info Flight Reservations Airport Lounge Access
Travel Tools	Online Check-in Travel Info Flight Reservations CLIQIT online AV8R online Papertrail Client Portal Online Invoicing Online Reporting Online & Mobile Voucher Retrieval Account Enquiries CO2 Footprint
Services	Strategic Guidance and Expertise Performance Insights and Analytics Mobile Travel Assistant – Profile Manager Corporate Travel Leisure Travel MICE Management Incentive Travel Film & Production Travel Global Network TWF Mobile Application
On-line Booking Tool	CLIQIT and AV8R Corporate and Self Booking Tool End to End Solution
Our Brands	Partner Website Links: “Leef jou Reis” met Gerrie Pretorius African Visitors Airline Partners Hotel Partners Car Rental & Shuttle Partners Operational Brands: TWF Corporate Travel Luxury with TWF Cliqit by TWF Corporate AV8R Powered by Travelit GTA Earthbound Travel Wholesale & Incentive
Supplier Hub	How to submit your invoices the smart/correct way Voucher Retrieval TWF Mobile Application Frequently Ask Questions Supplier Explainer Videos
Contact Us	TWF Branches Detail: Location Pretoria Johannesburg Cape Town Pietermaritzburg Washington USA
News	Social News Wellness TWF Monthly Newsletter – Flair Times HR Updates Awards & Achievements
Contact us	Email to TWF: Name, email address, subject and message

6. DESCRIPTION OF THE RECORDS OF TRAVEL WITH FLAIR (Pty) Ltd WHICH ARE AVAILABLE IN ACCORDNCE WITH ANY OTHER LEGISLATION

No.	Category of Records	Applicable Legislation	Retention Period
1	Company Registration & Incorporation Documents	Companies Act (Act No. 71 of 2008)	Permanent
2	Intellectual Property Records	Copyright Act (Act No. 98 of 1978)	Permanent
3	Employment Equity Plans & Reports	Employment Equity Act (Act No. 55 of 1998)	5 years
4	Tax Records (Income Tax)	Income Tax Act (Act No. 95 of 1967)	5 years
5	Employee Relations Records	Labour Relations Act (Act No. 66 of 1995)	3–5 years
6	VAT Records	Value-Added Tax Act (Act No. 89 of 1991)	5 years
7	Financial Advisory Records	FAIS Act (Act No. 37 of 2002)	5 years
8	Employment Contracts	Basic Conditions of Employment Act (Act No. 75 of 1997)	3 years after termination
9	Close Corporation Records	Close Corporations Act (Act No. 69 of 1984)	Permanent
10	Electronic Communications	Electronic Communications and Transactions Act (Act No. 25 of 2002)	5 years
11	PAIA Requests & Manuals	Promotion of Access to Information Act (Act No. 2 of 2000)	Permanent
12	UIF Records	Unemployment Insurance Act (Act No. 30 of 1996)	5 years
13	Skills Development Records	Skills Development Act (Act No. 97 of 1998)	5 years
14	Skills Levy Records	Skills Development Levies Act (Act No. 9 of 1999)	5 years
15	Workplace Injury Records	Compensation for Occupational Injuries and Diseases Act (COIDA)	5 years
16	Corporate Governance Records	Companies Act (Act No. 71 of 2008)	Permanent
17	Transport Records	Road Transportation Act (Act No. 74 of 1977)	3–5 years
18	Health & Safety Records	Occupational Health and Safety Act (Act No. 85 of 1993)	5 years
19	General Legal Records	Common Law	As required
20	Criminal/Legal Compliance Records	Criminal Procedure Amendment Act (Act No. 65 of 2008)	As required
21	Passenger Liability Records	Common Law / Industry Practice	3 years
22	Personal Information Records	Protection of Personal Information Act (Act No. 4 of 2013)	As long as necessary
23	Airline Compliance Records	IATA Regulations	As required
24	Travel Industry Records	ASATA Regulations	As required
25	Insurance Records	Short-Term Insurance Legislation	5 years
26	Governance Reports & Policies	King IV Code of Governance	Permanent
27	Payment Card Data	PCI-DSS	As required (restricted storage)
28	Company Regulatory Records	Companies Regulations (2011)	Permanent
29	Consumer Complaints	Consumer Protection Act (Act No. 68 of 2008)	3 years
30	Credit Records	National Credit Act (Act No. 34 of 2005)	3–5 years

No.	Category of Records	Applicable Legislation	Retention Period
31	B-BBEE Records	Broad-Based Black Economic Empowerment Act (Act No. 53 of 2003)	5 years
32	Treasury & Procurement Records	National Treasury Instructions	5 years
33	Immigration Records	Immigration Act (Act No. 13 of 2002)	Duration of stay + 2 years

7. DESCRIPTION OF THE SUBJECTS ON WHICH THE BODY HOLDS RECORDS AND CATEGORIES OF RECORDS HELD ON EACH SUBJECT BY TRAVEL WITH FLAIR (Pty) Ltd

Internal Records (Restricted Access) not available to Public (Section 51 (1) (d) - Summarized

Department	Records	Retention Period
IMS	Meeting minutes, audits, legal docs	5 years / Permanent (legal)
	27001:2022 & 9001:2015 Certificates	4 years
Finance	Financials, invoices, bank records	5 years
Tax	PAYE, VAT, SARS	5 years
Sales & Marketing	Client data, tenders, contracts	3-5 years
Supply Chain	Supplier contracts & vetting	5 years
Operations	Travel profiles, reports	3 years
MICE	Client & supplier documentation	5 years
Purchasing	Orders, supplier records	5 years
Human Capital	Employee records	3-5 years (some permanent)

Detailed Record List

1. Integrated Management System (IMS) & Governance Records		
Record	Retention Period	Responsible Owner
Director's Meeting Minutes	Permanent	COO / Executive PA
Strategic Planning Session Minutes	5 years	COO / Strategy Executive Team
Executive / Chief Meeting Minutes	5 years	Executive Management
IMS Review Meeting Minutes	5 years	Human Capital - Quality Assurance / Compliance
IMS Framework	Permanent (latest version controlled)	Chief Officer Human Capital - Compliance Administrator
Internal and External Audit Reports	5 years	Human Capital Compliance / Internal Audit
Legal Documentation	Permanent	Departmental Executives Legal / Compliance
2. Financial Records (CFO & Finance Department)		
Record	Retention Period	Responsible Owner
Annual Financial Statements	7 years	CFO
Management Accounts	7 years	Chief Officer Operational Finance
Signed Budgets	5 years	CFO
Asset Register	Life of asset + 5 years	Chief Officer Operational Finance and Financial Controller
Auditor Correspondence	7 years	CFO
3. Banking and Transactional Records		

Record	Retention Period	Responsible Owner
Bank Statements	7 years	Finance Department
Electronic Banking Records	7 years	Finance Department
Client Payment Remittances	7 years	Finance Department
Client & Supplier Payments	7 years	Finance Department
Client & Supplier Invoices and Statements	7 years	Finance Department
Client Orders & Supplier Invoices	7 years	Finance / Operations
Quicktrav Vouchers Issued	5 years	Operations / Finance
4. Taxation and Statutory Compliance Records		
Record	Retention Period	Responsible Owner
PAYE Records	5 years	Payroll / Finance
Employee Tax Documents (IRP5/IT3)	5 years	Payroll
Payments to SARS Records	5 years	Finance
VAT Records	5 years	Finance
SDL, UIF, Workmen's Compensation	5 years	Finance / Human Capital
Other Statutory Compliance Records	5 years (minimum)	Compliance / Finance
5. Sales & Marketing Records		
Record	Retention Period	Responsible Owner
Market Information / Website Content	3 years	Executive PA / Directors
Customer Information & Database	Duration of relationship + 5 years	Sales / Vtiger Cloud CRM Owners
Marketing Strategies	5 years	Chief Sales Officer Public Sector
Tender Documents	5 years	Sales / Bid Office
Tender Briefing & Presentation Minutes	5 years	Chief Sales Officer Public Sector
Supplier Agreements	Contract duration + 5 years	Chief Sales Officer Public Sector, Chief Financial Officer, Key Account Manager and Legal
Client Contracts & SLAs	Contract duration + 5 years	Chief Sales Officer Public Sector, Chief Financial Officer, Key Account Manager and Legal
Sales & Marketing Meeting Minutes	3 years	Sales / Marketing
Client Files (incl. S&T Policies)	Contract duration + 5 years	Key Account Managers
Customer Care Reports (Vtiger)	3-5 years	Customer Care Administrator
Client Meeting Minutes (Monthly/Quarterly)	3 years	Key Account Management
6. Supply Chain Management Records		
Record	Retention Period	Responsible Owner
Supplier Contracts	Contract duration + 5 years	Chief IT & Business Solutions Officer Supply Chain / Legal
Supplier Vetting Documents	5 years	Procurement / Compliance / Supply Chain
Supplier Registration Forms	5 years	Procurement / Supply Chain
Supplier Meeting Minutes	3 years	Chief IT & Business Solutions Officer
Sales Figures (Supply Chain related)	5 years	Chief IT & Business Solutions Officer Chief Officer Operational Finance Finance Managers / Supply Chain
7. Operations Records		

Record	Retention Period	Responsible Owner
Supplier Training Schedules	3 years	Operations
Client Travel Profiles	Duration of relationship + 2–5 years (POPIA)	Operations / CRM Owner
Weekly Team Leader Reports	2 years	Operations
Team Leader Meeting Minutes	3 years	Operations
8. MICE Records		
Record	Retention Period	Responsible Owner
Client Invoices & Remittances	7 years	Finance / MICE
Supplier Statements & Invoices	7 years	Finance / MICE
Client & Supplier Meeting Minutes	3 years	MICE
Tender Documents & Briefings	5 years	MICE / Sales
Client Files (Contracts, SLAs, Policies)	Contract duration + 5 years	MICE
9. Procurement / Purchasing Records		
Record	Retention Period	Responsible Owner
Supplier Vetting Records	5 years	Procurement
Purchase Orders	5–7 years	Procurement / Finance
Supplier Quotation Requests	3–5 years	Procurement
Supplier Contact Details	Duration of relationship + 2 years	Procurement
Preferred Supplier Register	Active + 5 years archive	Procurement
Supplier Meeting Minutes	3 years	Chief IT & Business Solutions Officer
10. Human Capital Records		
Record	Retention Period	Responsible Owner
Employment Contracts	Duration of employment + 5 years	Human Capital
Employment Equity Plan	5 years	Human Capital
Medical Aid & Pension Records & Funeral Plan	Duration of employment + 5 years	Human Capital
Salary Records	5 years	Payroll
Leave Records	3 years (BCEA minimum)	Human Capital
Disciplinary Records	3–5 years	Human Capital
Disciplinary Code	Permanent	Human Capital
Policies & Procedures	Permanent (version controlled)	Human Capital / Compliance
SETA Records	5 years	Human Capital / L&D

7.1 Access Control

All internal records:

- Require Form C / Form 2
- Require NDA
- Subject to approval
- May be refused per PAIA/POPIA

8. PROCESSING OF PERSONAL INFORMATION

8.1 Purpose of Processing Personal Information

Travel with Flair processes personal information to enable the effective delivery of travel management and related business services, while complying with applicable legal, contractual, operational, and regulatory obligations.

The purposes for processing personal information include, but are not limited to, the following:

- To facilitate and manage business travel arrangements, including flights, accommodation, vehicle hire, shuttle services, visas, travel insurance, conferencing, and related travel services.
- To create, maintain, and manage traveller profiles and customer accounts.
- To process reservations, bookings, ticketing, cancellations, amendments, refunds, and payments.
- To communicate with clients, travellers, suppliers, and stakeholders regarding travel arrangements, emergencies, disruptions, complaints, and service updates.
- To comply with contractual obligations concluded with clients, suppliers, service providers, and government institutions.
- To verify identities and authenticate travellers and authorised representatives.
- To comply with applicable legislation and regulatory requirements, including:
 - Protection of Personal Information Act (POPIA)
 - Promotion of Access to Information Act (PAIA)
 - Financial, tax, accounting, and auditing legislation
 - Immigration, aviation, and travel industry regulations
- To maintain internal operational records, governance, risk management, compliance monitoring, and audit requirements.
- To conduct supplier management, quality assurance, service monitoring, and customer satisfaction processes.
- To investigate complaints, incidents, fraud, misconduct, disputes, or security-related matters.
- To support human resource administration, payroll, recruitment, training, employee benefits, and employment-related processes.
- To maintain information technology systems, cybersecurity controls, access management, and business continuity measures.
- To process invoicing, financial transactions, credit control, reimbursements, and reporting functions.
- To fulfil reporting obligations to clients, regulators, auditors, and authorised third parties.
- To market and communicate Travel with Flair products, services, and industry-related information where consent or another lawful basis exists.
- To protect the legitimate interests, safety, and security of Travel with Flair, its employees, clients, travellers, suppliers, and service providers.

Travel with Flair processes personal information lawfully and only for specific, explicitly defined, and legitimate business purposes in accordance with POPIA principles. Travel with Flair (Pty) Ltd (“TWF”) is committed to transparency, accountability, and the protection of personal and confidential information. This Manual outlines the types of records held, procedures for requesting access, and the legal framework governing such access.

8.2 Description of the categories of Data Subjects and of the Information or categories of information relating thereto

Categories of Data Subjects	Personal Information that may be Processed
Clients / Customers	Names, surnames, identity/passport numbers, contact details, billing information, traveller preferences, travel itineraries, payment information, company details, emergency contact information, correspondence and complaint records
Travellers / Delegates	Passport details, visa information, travel bookings, airline preferences, accommodation requirements, meal preferences, loyalty programme information, travel history, emergency contacts, special assistance requirements
Employees	Personal identification information, employment records, qualifications, payroll information, banking details, tax information, performance records, disciplinary records, leave records, medical aid and benefit information

Categories of Data Subjects	Personal Information that may be Processed
Prospective Employees / Job Applicants	CVs, qualifications, employment history, references, background verification information, interview records, contact details
Suppliers / Service Providers	Company registration details, contact information, banking details, tax certificates, B-BBEE certificates, contracts, SLA information, compliance documentation
Directors / Shareholders	Identity information, contact details, company-related records, governance records, statutory disclosures
Contractors / Consultants	Contracts, contact information, qualifications, banking details, compliance documentation, access records
Website Users / Online Platform Users	IP addresses, login credentials, cookies, website usage information, electronic communication records
Visitors to Premises	Visitor registers, identification details, CCTV footage, vehicle registration details, access control records
Emergency Contacts / Next of Kin	Names, contact details, relationship to traveller or employee
Government Departments / Public Sector Clients	Contact information of authorised officials, travel instructions, approvals, billing and procurement information
Beneficiaries / Dependants	Names, identification details, relationship information, benefit-related information where applicable

*** *Travel with Flair processes personal information strictly in accordance with the Protection of Personal Information Act, 2013 (POPIA), and only for lawful, specific, and operationally required purposes. The categories of personal information processed may vary depending on the nature of the relationship with the data subject and the services rendered.*

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

Recipients / Categories of Recipients	Purpose of Disclosure
Airlines and Aviation Service Providers	Flight reservations, ticketing, travel management, travel changes, and related travel services
Hotels and Accommodation Providers	Accommodation reservations, check-in arrangements, traveller verification, and related hospitality services
Vehicle Rental Companies and Shuttle Service Providers	Ground transportation arrangements, transfers, and transport-related services
Travel Technology and Global Distribution System Providers	Processing and management of travel bookings, itineraries, traveller profiles, and reservation systems
Visa, Passport, Immigration and Consular Service Providers	Visa applications, immigration processing, travel documentation, and border entry requirements
Travel Insurance Providers	Issuing travel insurance policies, claims administration, and emergency travel assistance
Clients / Employer Organisations	Travel reporting, billing, approvals, policy compliance, and management reporting
Financial Institutions and Payment Service Providers	Processing payments, refunds, banking verification, and financial transactions
Regulatory Authorities and Government Departments	Compliance with legal obligations, statutory reporting, tax requirements, law enforcement requests, and regulatory oversight
Auditors, Attorneys, and Professional Advisors	Governance, legal compliance, auditing, dispute resolution, and professional advisory services
Information Technology Service Providers	Hosting, cybersecurity, system maintenance, cloud services, backup services, and technical support
Human Capital and Payroll Service Providers	Employee administration, payroll processing, benefits administration, and statutory deductions
Medical or Emergency Assistance Providers	Emergency support, traveller assistance, health-related emergencies, and duty-of-care obligations
Debt Collection Agencies and Credit Bureaus	Debt recovery, credit verification, and financial risk management where applicable
Third-Party Contractors and Consultants	Operational support services, project implementation, compliance management, and specialised business functions
Courts, Tribunals, and Law Enforcement Agencies	Compliance with legal processes, subpoenas, investigations, or court orders

Recipients / Categories of Recipients	Purpose of Disclosure
Industry Bodies and Accreditation Organisations	Industry compliance, accreditation requirements, reporting, and operational governance

*** Personal information is only disclosed to authorised recipients where there is a lawful basis for such disclosure, including contractual necessity, legal obligation, consent, legitimate business interest, or compliance with applicable legislation, including the Protection of Personal Information Act, 2013 (POPIA).

8.4 Planned Transborder flows of personal information

Travel with Flair may transfer, store, or process personal information outside the Republic of South Africa where operationally required for travel management services, cloud hosting, system support, reservations, international travel bookings, or related business activities.

Such transborder flows may include the following:

Recipient / Service Provider Category	Country / Region	Purpose
Microsoft Azure Cloud Services	Global cloud infrastructure regions, including South Africa and international data centres	Secure cloud hosting, data storage, backup services, cybersecurity, business continuity, and system infrastructure
International Airlines and Global Distribution Systems (GDS)	Various international jurisdictions	Flight reservations, ticketing, traveller profile management, and itinerary processing
International Hotels and Travel Suppliers	Various international jurisdictions	Accommodation bookings and travel service fulfilment
Visa and Immigration Authorities	Foreign countries relevant to travel destination	Processing visa applications and immigration requirements
International Travel Technology Providers	Various international jurisdictions	Travel management systems, traveller tracking, reporting, and operational support
Global Payment and Banking Service Providers	Various international jurisdictions	Processing international financial transactions and payments

Travel with Flair takes reasonable steps to ensure that any transborder transfer of personal information is subject to appropriate safeguards and is processed in accordance with the Protection of Personal Information Act, 2013 (POPIA).

Personal information may only be transferred to third parties in foreign countries where:

- The recipient is subject to laws, binding corporate rules, or agreements that provide an adequate level of protection substantially similar to POPIA;
- The transfer is necessary for the performance or conclusion of a contract;
- The data subject has consented to the transfer;
- The transfer is required for the benefit of the data subject; or
- The transfer is otherwise permitted in terms of applicable legislation. Travel with Flair utilises appropriate technical and organisational security measures, including secure cloud technologies and controlled access protocols, to protect personal information during cross-border processing and storage activities.

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

Travel with Flair implements appropriate, reasonable technical and organisational measures to protect personal information against loss, misuse, unauthorised access, disclosure, alteration, destruction, or cyber threats, in accordance with the Protection of Personal Information Act, 2013 (POPIA).

The organisation's information security measures include, but are not limited to, the following:

Technical Security Measures

- Data encryption technologies to protect personal information during storage and transmission.
- Secure password controls, including password complexity requirements, password expiry protocols, and restricted user access management.
- Multi-factor authentication (MFA) and access authentication controls where applicable.
- Anti-virus and anti-malware protection solutions deployed across systems, servers, endpoints, and user devices.
- Firewalls, intrusion detection, and network security monitoring solutions.
- Email security filtering and phishing protection mechanisms.
- Endpoint protection and device management controls.
- Secure cloud hosting and infrastructure security measures, including Microsoft Azure security controls.
- Regular system patching, software updates, and vulnerability management processes.
- Backup and disaster recovery procedures to ensure data availability and business continuity.
- Data loss prevention and monitoring controls where applicable.
- Secure remote access and virtual private network (VPN) controls for authorised users.

Organisational and Administrative Security Measures

- Role-based access controls limiting access to personal information on a need-to-know basis.
- Confidentiality agreements with employees, contractors, suppliers, and third-party service providers.
- Information security, POPIA, and cybersecurity awareness training for employees.
- Internal policies governing acceptable use, data handling, records management, and information security. Incident response and breach management procedures for identifying, reporting, investigating, and mitigating security incidents.
- Supplier and third-party risk assessments to ensure appropriate security safeguards are maintained by external service providers.
- Physical security controls at premises, including visitor access management, controlled access areas, CCTV monitoring, and secure storage of records.
- Ongoing monitoring, auditing, and review of security controls and operational risks.
- Travel with Flair continuously reviews and enhances its information security controls to ensure the ongoing confidentiality, integrity, and availability of personal information processed within the organisation.

9. AVAILABILITY OF THE PAIA MANUAL

9.1 A copy of the Manual is available-

9.1.1 On

- TWF website – www.travelwithflair.co.za
- At the Head Office Premises of Travel with Flair (Pty) Ltd
- On request

9.1.2 head office of Travel with Flair (Pty) Ltd for public inspection during normal business hours;

9.1.3 to any person upon request and upon the payment of a reasonable prescribed fee; and

9.1.4 to the Information Regulator upon request.

9.2 A fee for the copy of the Manual, as contemplated in Annexure B of the Regulations shall be payable per each A4-size photocopy made. – pages 12 – 14

10. UPDATING OF THE MANUAL

The Chief Human Capital Officer, Ulene Mitchell will on a regular basis update this manual.

Issued by

Khalil Sattar

Chief Information Officer & Chief Operations Officer

9.2 PAIA FEES: AS CONTAINED IN ANNEXURE B TO THE NEW PROMOTION OF ACCESS TO INFORMATION ACT, 2000 (ACT NO 2 OF 2000), (PAIA): REGULATIONS ON PAGES 18 TO 85 IN REGULATION GAZETTE NO. 11329 DATED 27 AUGUST 2021, VOL. 674, NO. 45057

1. The PAIA fees that applies are as follows:		
REQUEST FEE		
The deputy information officer who handles the request must complete Part A of the SAPS 512(b) Notice of Fee Payable-form and provide it to the requester, informing him or her of the Request Fee payable before the request will be processed any further.		
Item	Description	Amount
1	The Request Fee payable by a requester	R 100,00
ACCESS/REPRODUCTION FEE		
When access is granted, the deputy information officer who handles the request must complete Part A of the SAPS 512(e) Decision on Request for Access to a Record-form and notify the requester, amongst other, the access fee which is payable.		
Item	Description	Amount
2	Photocopy of A4-size page or part thereof	R 1,50
4.	Printed copy of A4-size page or part thereof	R 1,50
5	For a copy in a computer-readable form on: (1) Flash drive (to be provided by the requester) (2) Compact disc: (a) If provided BY the requester (2)(a) (b) If provided TO the requester (2)(b)	R 40,00 R 40, 00 R 60, 00
6	6. For a transcription of visual images per A4-size page	Service to be outsourced. Will depend on quotation from Service provider.
7	Transcription of an audio record, per A4-size page	R 24,00
8	Copy of an audio record on: (1) Flash drive (to be provided by the requester) (1) (2) Compact disc: (a) If provided BY the requester (2)(a) (b) If provided TO the requester (2)(b)	R 40,00 R 40, 00 R 60, 00
9	To search for and prepare the record for the disclosure for each hour or part of an hour, excluding the first hour (i.e. the first hour is free of charge), reasonably required for such search and preparation. To NOT EXCEED a total cost of:	R 100,00 R 300,00
10	Deposit if search exceeds 6 hours one third of	One third of amount per request calculated in

	NOTE the amount payable as a deposit must not exceed, one third of amount payable, if the request is granted.	terms of items 2 to 8.
11	Postage, email or any other electronic transfer	Actual expense, if any.

PAIA FEES: AS CONTAINED IN ANNEXURE B TO THE NEW PROMOTION OF ACCESS TO INFORMATION ACT, 2000 (ACT NO 2 OF 2000), (PAIA): REGULATIONS ON PAGES 18 TO 85 IN REGULATION GAZETTE NO. 11329 DATED 27 AUGUST 2021, VOL. 674, NO. 45057

2. Personal Requester

The definition of a “personal requester” has been deleted in the PAIA and a person who requests access to a record that contains personal information relating to himself or herself is now liable to also pay the R 100,00 Request Fee (this includes this person’s authorised representative e.g. this person’s attorney, lawyer, insurance company, parents of the minor child or the next of kin, etc.).

3. Request for access to section 15 Automatically Available Record

The National Deputy Information Officer: PAIA annually updates the section 15 of PAIA Notice (list) of Automatically Available Records of the Service. The updated notice for 2021 will be published by the Minister of Justice and Correctional Services and the National Deputy Information Officer: PAIA will make the updated published Notice available:

- (a) to the Information Regulator;
- (b) on the website of the Service to replace the current Notice;
- (c) on the Intranet for employees; and
- (d) for inspection at the office of the National Deputy Information Officer.

These records are listed as automatically available without a requester having to request access thereto through the normal PAIA request procedure. The procedure to follow when a request for access to such a record is received at the Service, is still applicable as set out in par 35 of the NI 14 of 2019. A requester may request a copy of such record and must be provided with such copy upon payment of the Access or Reproduction Fee (where applicable). The R 100,00 Request Fee is not payable. For ease of reference, an example of some of the records that are listed as section 15 Automatically Available Records, are:

DESCRIPTION OF CATEGORIES OF RECORDS AUTOMATICALLY AVAILABLE IN TERMS OF SECTION 15(1) OF THE PROMOTION OF ACCESS TO INFORMATION ACT, 2000	MANNER OF ACCESS TO RECORDS
<p>Note that —</p> <p>The following persons are deemed to be authorised persons:</p> <p>(a) an involved party in the accident (e.g. driver, passenger, pedestrian, cyclist, owner of the vehicle, owner of the animal involved in the accident, etc) if 3 of 3</p> <p>PAIA FEES: AS CONTAINED IN ANNEXURE B TO THE NEW PROMOTION OF</p>	
DESCRIPTION OF CATEGORIES OF RECORDS AUTOMATICALLY AVAILABLE FORCOPYPING IN TERMS OF SECTION 15(1)(a)(ii)	
ACCIDENT REPORT (NEW OR OLD REPORTS): COPY OR PHOTOCOPY	If the record is still in the possession or under control of the Service, the records may be obtained by the authorised person

<p>Note that —</p> <ul style="list-style-type: none"> • with the term “copy” is meant where reproduction is done manually; • a copy of a completed accident report will only be furnished to the authorised person; • when a request is received in writing from the Road Accident Fund, provincial hospitals or ambulance services from provincial hospitals, they are regarded as public bodies or institutions who are entitled to immediately receive a copy of an accident report free of charge. 	<p>on request in writing on the prescribed request form or the SAPS 512(n) addressed to the relevant office of the Service.</p> <p>Note that —</p> <p>The following persons are deemed to be authorised persons:</p> <ul style="list-style-type: none"> (a) an involved party in the accident (e.g. driver, passenger, pedestrian, cyclist, owner of the vehicle, owner of the animal involved in the accident, etc) if he or she can prove that he or she is an involved party; (b) any private ambulance service, medical service provider, emergency service or towing service that provided such a service to a party involved in an accident, if such private service can provide written proof that such service was rendered; or (c) a person who is not an involved party or the private ambulance service, medical service provider, emergency service or towing service referred to above, only if he or she has written permission or authority of an involved party (e.g. an attorney who provides the relevant power of attorney to act on behalf of the person).
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- 4. Persons who do not pay any fees**
The following persons do not pay the Request Fee or any Access or Reproduction Fees:
- (a) The suspect, victim or complainant who requests a copy of his or her own statement in an open docket;
 - (b) A record that must be provided in terms of a subpoena duces tecum or summons; and
 - (b) A person that is exempted by the Minister of Justice and Correctional Services by proclamation in the Gazette (e.g. a person who is incarcerated or he or she is unemployed or he or she receives an annual income, after permissible deductions which does not exceed R 14 712, 00 or he or she is married and his or her life partner whose annual income, after permissible deductions does not exceed R27 192, 00 per annum, etc.) (see par 14(2)(g) of NI 14 of 2019)

13. TRAVEL WITH FLAIR (Pty) Ltd BRANCHES CONTACT INFORMATION

Branch	Pseudo Code	IATA Number	VAT Number	Tel Number	Physical Address	Postal Address	Contact Email	Ops Manager	AH Nr
Head Office (Pretoria)	CU5	77210383	488 016 0835	+27 (012) 424-3300 / 0861 777 747	17 Umgazi Road, Menlo Park, Pretoria, South Africa	Private Bag 11291, Maroelana, 0161	info@twf.co.za	Caiphus Nthambeleni (caiphusn@twf.co.za)	0861 777 747
Johannesburg	OH9	77207745	457 021 6079	+27 (011) 253-2600	5 Coombe Place, Rivonia, Sandton, South Africa	PO Box 5061, Rivonia, 2128	infojnb@twf.co.za	Nicole Adonis (NicoleA@twf.co.za)	0861 777 747
Cape Town	7OLY	77210534	495 021 7077	+27 (021) 419-1350	43 Somerset Road, Green Point, Cape Town, South Africa	PO Box 621, Greenpoint, 8005	info@twfcpt.co.za	Karen King (karenk@twfcpt.co.za)	0861 777 747
Pietermaritzburg	3B5L	77210383	488 016 0835	+27 (0) 861 777-380	170 Peter Brown Drive, Town Bush Valley, Pietermaritzburg, South Africa	PO Box 11050, Dorpspruit	infopzb@twf.co.za	Sibonelo Zungu (infopzb@twf.co.za)	0861 777 747
TWF Corporate Investments LLC (USA)	EH2	07639505	NA	+1 860 619-0300 / +1 860 717-1776	8 Titus Road, Washington Depot, CT 06794, USA	PO Box 6, Washington Depot, CT, 06794, USA	bookings@twf-usa.com	bookings@twf-usa.com	+1 860 717 1776