

**Promotion of Access to Information Act (PAIA)**

**Protection of Personal Information Act (POPIA)**

**Manual**



**Gooderson Leisure Corporation Proprietary Limited  
and its Subsidiaries**

**Company Registration Number: 1972/004241/07**

This manual was prepared in accordance with Section 51 of the Promotion of Access to Information Act, 2000 and to address requirements of the of the Protection of Personal Information Act, 2013.

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## **1) Background to the Promotion of Access to Information Act**

- 1.1) The Promotion of Access to Information Act, No. 2 of 2000 ("PAIA"), was enacted on 3 February 2000 to give effect to the constitutional right of access to information, as provided for in section 32 of the Bill of Rights in the Constitution of the Republic of South Africa, 1996 (Act No. 108 of 1996). This right entitles individuals to access any information held by the State, as well as information held by another person that is required for the exercise or protection of any rights.
- 1.2) In accordance with Section 51 of the Promotion of Access to Information Act, 2000 ("PAIA"), all private bodies (non-governmental entities) are required to compile and make available a PAIA Manual (also referred to as an "Information Manual"). This manual outlines the procedures to be followed in requesting access to information held by the entity, as well as other prescribed information
- 1.3) When a formal request for access to information is made in terms of PAIA, the private body receiving the request is legally obliged to consider and respond to the request. Access to the requested information must be granted unless refusal is justified in terms of the exemptions and limitations set out in PAIA or any other applicable legislation or regulatory framework.

## **2) Introduction to Gooderson Leisure Corporation Proprietary Limited and its Subsidiaries ("Gooderson Leisure Group")**

- 2.1) The Gooderson Leisure Group is a proudly South African hospitality group with over 50 years of experience in the tourism and leisure industry. The company offers a diverse portfolio of accommodation, conference and wedding facilities, restaurant and food services, and is actively involved in timeshare development and property management.

Operating in KwaZulu-Natal, Mpumalanga, and the Western Cape, Gooderson Leisure provides guests with the opportunity to experience the very best of South Africa's iconic landscapes — from beach and berg to bush and battlefields. The group's properties cater to both leisure and corporate tourists, delivering consistent value, exceptional service, and memorable experiences.

With a focus on "Good Value, Good Fun", Gooderson Leisure is committed to making travel affordable, rewarding, and enriching. Guests can enjoy a wide range of amenities and activities, including:

- NGU-rated 18-hole and 9-hole golf courses
- Spa & Wellness centres
- Game viewing experiences
- Adventure and cultural activities

Driven by a mission of operational excellence and customer satisfaction, Gooderson Leisure continues to grow its market presence and enhance its product offering. The company is structured to ensure strategic execution through sound governance, financial and administrative capability, and a motivated, adaptable workforce.

- 2.2) This PAIA Manual is available at the Company Registered Office at Gooderson Tropicana Hotel, 85 O R Tambo Parade, Durban, 4001, as well as on the Company's website, [www.goodersonleisure.co.za](http://www.goodersonleisure.co.za)

2.3) The Gooderson Leisure Group comprises of the following companies which are also covered by this manual:

<b>•</b>	<b><u>NAME OF COMPANY</u></b>	<b><u>COMPANY REGISTRATION NUMBER</u></b>
1	Gooderson Leisure Corporation Proprietary Limited	1972/004241/07
2	<b>Alawill Investments (Pty) Ltd</b>	1980/002740/07
3	Bushlands Game Lodge (Pty) Ltd	1965/003614/07
4	Century Projects and Design (Pty) Ltd	1966/010733/07
5	Century Hotels (Pty) Ltd	1969/014748/07
6	<b>Dumazulu Kraal (Pty) Ltd</b>	1994/002540/07
7	Durban Inn (Pty) Ltd	1975/004637/07
8	Drakensberg Gardens Hotel (Pty) Ltd	1949/035711/07
9	<b>GDS Investments (Pty) Ltd</b>	1972/004292/07
10	Good Vacations (Pty) Ltd	1989/007275/07
11	Gooderson Vacation Sales (Pty) Ltd	1996/000697/07
12	J & M Stiebel (Pty) Ltd	1951/002625/07
13	M & D Robinson (Pty) Ltd	1961/002464/07
14	Natal Spa Investments (Pty) Ltd	1955/000583/07
15	Zululand Tours and Safaris (Pty) Ltd	1958/002993/07
16	Goodhome Investments (Pty) Ltd	1995/005424/07
17	Leading Hospitality Solutions (Pty) Ltd	2015/439048/07

## **2) DIVISIONS – ALAWILL INVESTMENTS (PTY) LTD**

- 2.1 Alawill Investments (Pty) Ltd T/A Drakensberg Gardens Hotel
- 2.2 Alawill Investments (Pty) Ltd T/A Head Office / Sales & Marketing
- 2.3 Alawill Investments (Pty) Ltd T/A Kloppenheim Country Estate Hotel
- 2.4 Alawill Investments (Pty) Ltd T/A Knysna Chalets
- 2.5 Alawill Investments (Pty) Ltd T/A Mtunzini Forest Lodge
- 2.6 Alawill Investments (Pty) Ltd T/A Mtunzini Developer
- 2.7 Alawill Investments (Pty) Ltd T/A Natal Spa
- 2.8 Alawill Investments (Pty) Ltd T/A Tropicana Hotel

## **3 DIVISIONS – DUMAZULU KRAAL (PTY) LTD**

- 3.1 Dumazulu Kraal (Pty) Ltd
- 3.2 Dumazulu Kraal (Pty) Ltd T/A Monks Cowl Golf Resort

## **4 DIVISIONS – TIMESHARE - GDS INVESTMENTS (PTY) LTD**

- 4.1 GDS Investments (Pty) Ltd T/A Fairways Developer
- 4.2 GDS Investments (Pty) Ltd T/A Goodfin
- 4.3 GDS Investments (Pty) Ltd T/A Kloppenheim Developer
- 4.4 GDS Investments (Pty) Ltd T/A Natal Spa Developer
- 4.5 GDS Investments (Pty) Ltd T/A Vacation Sales & Rentals

### **3) Purpose of the PAIA Manual**

- 3.1) The purpose of the Promotion of Access to Information Act (PAIA) is to give effect to the constitutional right of access to information held by the state and by private bodies such as the Gooderson Leisure Group. PAIA aims to foster a culture of transparency and accountability by granting individuals the right to access information that is required for the exercise or protection of any rights. It actively promotes a society in which the people of South Africa have effective access to information, enabling them to exercise and protect their rights.
- 3.2) Section 9 of PAIA recognises that the right to access information is not absolute and must be subject to justifiable limitations. These limitations include, but are not limited to
- 3.2.1) the reasonable protection of personal privacy;
  - 3.2.2) the safeguarding of commercial confidentiality; and
  - 3.2.3) the promotion of effective, efficient, and good governance.
- These limitations must be applied in a manner that appropriately balances the right of access to information with other rights, including those enshrined in the Bill of Rights in the Constitution.
- 3.3) This PAIA Manual complies with the requirements of the Guide referred to in Section 10 of PAIA. It also acknowledges that, with the commencement of the Protection of Personal Information Act 4 of 2013 ("POPIA"), the Information Regulator is tasked with overseeing and ensuring compliance with both PAIA and its associated regulations by public and private bodies.
- 3.4) Capitalised terms used in this PAIA Manual shall bear the meanings ascribed to them in PAIA and POPIA, unless otherwise defined herein.

### **4) Contact Details of the Chief Executive Officer in Terms of [Section 51(1)(a)]**

Chief Executive Officer	Gavin Michael Castleman
Postal address	PO Box 10305 Marine Parade 4056
Street address	Gooderson Tropicana Hotel 85 O.R. Tambo Parade Durban 4001
Telephone	+(27) 31 368 1511
E-mail	gcastleman@goodersons.co.za
Website	<a href="http://www.goodersonleisure.co.za">www.goodersonleisure.co.za</a>

## **5) The Information Officer [Section 51(1)(b)]**

- 5.1) The Gooderson Leisure Group has appointed an Information Officer, duly registered with the Information Regulator, to manage and assess requests for access to information. The Information Officer is also responsible for overseeing the organisation's compliance with its duties and responsibilities in terms of the Promotion of Access to Information Act (PAIA) and the Protection of Personal Information Act (POPIA).
- 5.2) Where necessary, the Information Officer may appoint one or more Deputy Information Officers, in accordance with Section 17 of PAIA and Section 56 of POPIA. This ensures that The Gooderson Leisure Group remains as accessible as reasonably possible to individuals requesting records and also enables effective compliance with the obligations set out in Section 55 of POPIA.
- All requests for information made under PAIA and/or POPIA must be directed to the Information Officer.

### **Contact Details of the Information Officer**

Information Officer	Rajendra Nannoolal
Postal address	PO Box 10305 Marine Parade 4056
Street address	Gooderson Tropicana Hotel 85 O.R. Tambo Parade Durban 4001
Telephone	+(27) 31 337 2672
E-mail	glcfin@goodersons.co.za
Website	<a href="http://www.goodersonleisure.co.za">www.goodersonleisure.co.za</a>

## **6) Guide of SA Human Rights Commission [Section 51(1) (b)]**

- 6.1) In terms of the Promotion of Access to Information Act, 2000 ("PAIA"), a requester may be granted access to the records of a private body if the record is required for the exercise or protection of any rights.
- 6.2) Requests for access to records in terms of PAIA must be made in accordance with the prescribed procedures and at the rates provided. The relevant forms and fee structures are outlined in paragraphs 14 and 15, as well as in the appendices to this Manual.
- 6.3) Requesters are referred to the official PAIA Guide compiled by the Information Regulator.
- 6.4) The PAIA Guide is available free of charge and provides information to assist individuals in exercising their rights of access to information under PAIA and the Protection of Personal Information Act, 2013 ("POPIA"). Updated copies of the Guide are available from the Information Regulator in the prescribed manner.

Contact body	The Information Regulator (South Africa)
Physical Address	Woodmead North Office Park, 54 Maxwell Drive, Woodmead, Johannesburg
Postal Address	P.O. Box 31533, Braamfontein, Johannesburg, 2017
Telephone Number	+27 (0)10 023 5200 +27(0) 800 017 160
Email address	PAIAComplaints@infoeregulator.org.za POPIAComplaints@infoeregulator.org.za
Website	<a href="https://www.infoeregulator.org.za">https://www.infoeregulator.org.za</a>

## **7) Automatic Disclosure - Categories of records available without having to request access (Section 51(1)(c)) in terms of PAIA**

### **7.1) Website**

The web page [www.goodersonleisure.co.za](http://www.goodersonleisure.co.za) is accessible to anyone who has access to the internet. The website hosts the following categories of information:

#### **Home Page**

Choose your Location  
History of the Company  
Camping & Caravanning  
Conferencing & Weddings  
Golf  
Spa  
Timeshare  
Promotions  
Loyalty  
Central Reservations contact details  
Book Online  
Terms & Conditions  
Reservation Policy  
Privacy Policy  
Cookie Policy  
Property Descriptions  
View Property  
Book Now  
Facility Amenities  
Accommodation on offer  
Gallery  
Head Office address and contact details  
Social Media Links

Tropicana Hotel – *Durban Beachfront - KwaZulu Natal*  
Drakensberg Gardens Golf & Spa Resort – *Underberg – Southern Drakensberg*  
Bushlands Game Lodge – *Hluhluwe – KwaZulu Natal*  
Dumazulu Lodge & Traditional Village – *Hluhluwe – KwaZulu Natal*  
Mtunzini Forest Lodge – *Mtunzini – KwaZulu Natal*  
Natal Spa Hot Springs & Leisure Resort – *Paulpietersburg – KwaZulu Natal*  
Kloppenheim Country Estate Hotel – *Dullstroom - Mpumalanga*  
Monks Cowl Golf Resort – *Central Drakensberg – KwaZulu Natal*  
Knysna Chalets – *Garden Route – Western Cape*

- **Timeshare - Properties**

Fairways Gold Crown Resort – *Southern Drakensberg – KwaZulu Natal*

Riverbend Chalets – *Southern Drakensberg – KwaZulu Natal*

Mountainview Cottages – *Southern Drakensberg – KwaZulu Natal*

Silversands II – *Durban – KwaZulu Natal*

Natal Spa Hot Springs & Leisure Resort – *Paulpietersburg – KwaZulu Natal*

## **8) Subjects and Categories of Records Available only on Request in Terms of PAIA [Section 51(1) (e)]**

### **8.1 Records held by Gooderson Leisure Corporation Proprietary Limited and its Subsidiaries**

For the purposes of this clause, “Personnel” refers to any individual who works for, or provides services to or on behalf of, the Gooderson Leisure Group and receives, or is entitled to receive, remuneration. This includes, but is not limited to:

- Executive and Non-Executive Directors
- Permanent, temporary, and part-time employees
- Contract workers
- Any person assisting in the conduct or operations of Gooderson Leisure Corporation Proprietary Limited and its Subsidiaries

This clause outlines the categories of information that the Gooderson Leisure Group maintains in relation to its Personnel. The information is classified and grouped according to the following categories:

<b>SUBJECT</b>	<b>CATEGORY</b>
<b>Companies Act and Statutory Records</b>	<ul style="list-style-type: none"> <li>• All trust deeds</li> <li>• Documents of Incorporation</li> <li>• Index of names of Directors</li> <li>• Memorandum of Incorporation (MOI)</li> <li>• Minutes of meetings of the Board of Directors</li> <li>• Minutes of Board and Statutory Committees</li> <li>• Minutes of Management Committees</li> <li>• Proxy forms</li> <li>• Register of debenture-holders</li> <li>• Register of directors’ shareholdings</li> <li>• Share certificates</li> <li>• Share Register and other statutory registers and/or records and/or documents</li> <li>• Resolutions/Special resolutions passed by the Board of Directors and Shareholders at General and Class meetings</li> <li>• Records relating to the appointment of: Auditors, Directors, Prescribed Officer, Public Officer and Secretary</li> <li>• Statutory Registers</li> <li>• Annual Reports</li> <li>• Annual Returns</li> <li>• Intellectual Property: Trade Mark Certificates</li> <li>• Licences</li> <li>• Copyright and Designs</li> <li>• Health and Safety Records</li> </ul>



<b>SUBJECT</b>	<b>CATEGORY</b>
<b>Sales and Marketing</b>	<ul style="list-style-type: none"> <li>• Advertising and promotional material</li> <li>• Customer (including guest) records</li> <li>• Credit application information</li> <li>• Information and records provided by a third party</li> <li>• Marketing material and media releases: brochures, newsletters and general notices</li> <li>• Statements of Account</li> <li>• Terms and Conditions of Residence</li> <li>• Guest Registration Card</li> <li>• Loyalty Programme</li> </ul>
<b>Risk Management and Audit</b>	<ul style="list-style-type: none"> <li>• Audit reports</li> <li>• Risk management frameworks</li> <li>• Risk management plans</li> </ul>
<b>Safety, Health and Environment</b>	<ul style="list-style-type: none"> <li>• Complete Safety, Health and Environment Risk Assessment</li> <li>• Environmental Managements Plans</li> <li>• Inquiries, inspections, examinations by health, safety and environmental authorities</li> </ul>
<b>Information Technology</b>	<ul style="list-style-type: none"> <li>• Disaster recovery plans</li> <li>• Hardware asset registers</li> <li>• Information security policies/standards/procedures</li> <li>• Information technology systems and user manuals</li> <li>• Information technology user policy documentation</li> <li>• Project implementation plans</li> <li>• Software and licences</li> <li>• System documentation and manuals</li> <li>• Operating Systems</li> </ul>
<b>Corporate Social Responsibility (CSR) and Enterprise Development</b>	<ul style="list-style-type: none"> <li>• CSR schedule of projects/record of organisations that receive funding, inclusive of donations and sponsorships</li> <li>• Reports, books, publications and general information related to CSR spend</li> <li>• Records and contracts of agreement with funded organisations</li> <li>• Bursary Trust</li> </ul>
<b>Assets</b>	<ul style="list-style-type: none"> <li>• Land and Building Register</li> <li>• Fixed Asset Register</li> <li>• Title Deeds</li> <li>• Leases</li> </ul>
<b>Procurement</b>	<ul style="list-style-type: none"> <li>• Standard Terms and Conditions for supply of services and products</li> <li>• Contractor, client and supplier agreements</li> <li>• Lists of suppliers, products, services and distribution</li> <li>• Policies and Procedures</li> </ul>
<b>Insurance</b>	<ul style="list-style-type: none"> <li>• Insurance policies</li> <li>• Claim Records</li> </ul>
<b>Operational Information</b>	<ul style="list-style-type: none"> <li>• This information can be defined as information needed in the day-to-day running of the organisation. Examples of such information include, but are not limited to, internal telephone lists, address lists, company policies, company procedures, human resources policies and procedures, administration manual, industry related statistical data, guest database, historical guest histories, guest reservation data, management information reports, property development information such construction contracts and architectural drawings.</li> </ul>

- 8.2) Please note that access to records is subject to the grounds for refusal as set out in this PAIA Manual. Among other considerations, any records deemed confidential by a third party will require the written consent of the third party concerned—in addition to meeting the usual requirements—before Gooderson Leisure Corporation Proprietary Limited and its Subsidiaries will consider granting access.

## **9. Description of the Records of the Body Which Are Available in Accordance with Any Other Legislation (Section 51(1)(d))**

- 9.1 Where applicable to its operations, Gooderson Leisure Corporation Proprietary Limited and its Subsidiaries retains records and documents in accordance with the various legislative requirements listed below. Unless disclosure of such records is prohibited by legislation, regulation, contractual agreement, or other lawful restrictions, these records—where required to be made available under such laws—will be accessible to interested parties.

Access will be granted in accordance with the requirements and procedures set out in the Promotion of Access to Information Act (PAIA), the relevant legislation under which the record is held, and Gooderson Hotels' internal policies and procedures, provided the requesting party is entitled to such information. All access requests must be submitted in compliance with the provisions of PAIA.

- Basic Conditions of Employment Act, No 75 of 1997;
- Broad- Based Black Economic Empowerment Act, No 75 of 1997;
- Businesses Act, No 71 of 1991;
- Companies Act, No 71 of 2008;
- Compensation for Occupational Injuries & Diseases Act, 130 of 1993;
- Competition Act, No.71 of 2008;
- Constitution of the Republic of South Africa 2008;
- Consumer Protection Act, 2008;
- Copyright Act, No 98 of 1978;
- Customs & Excise Act, 91 of 1964;
- Deeds Registries Act, 1937
- Electronic Communications Act, No 36 of 2005;
- Electronic Communications and Transactions Act, No 25 of 2002;
- Employment Equity Act, No 55 of 1998;
- Financial Intelligence Centre Act, No 38 of 2001;
- Financial Markets Act, 2012
- Foodstuffs, Cosmetics and Disinfectants Act, 1972
- Harmful Business Practices Act, 1999
- Immigration Act, No. 13 of 2002;
- Income Tax Act, No 58 of 1962;
- Intellectual Property Laws Amendment Act, No 38 of 1997;
- JSE Listings Requirements;
- Labour Relations Act, No 66 of 1995;
- Long Term Insurance Act, No 52 of 1998;
- Medical Schemes Act, 1956;
- National Liquor Act, No 59 of 2003 and Liquor legislation for the various provinces and related By-laws;
- Occupational Health & Safety Act, No 85 of 1993;
- Pension Funds Act, No 24 of 1956;
- Prescription Act, No 68 of 1969;
- Prevention of Organised Crime Act, No 121 of 1998;
- Promotion of Access to Information Act, No 2 of 2000;
- Protected Disclosures Act, No. 26 of 2000;
- Protection of Personal Information Act, No. 4 of 2013;
- Regulation of Interception of Communications and Provision of Communication-Related Information Act 70 of 2002;
- Skills Development Levies Act, No. 9 of 1999;

- Short-term Insurance Act No. 53 of 1998;
- Trademarks Act, 1993
- Trust Property Control Act 57 of 1988;
- Unemployment Insurance Contributions Act 4 of 2002;
- Value Added Tax Act 89 of 1991;

We have used our best endeavours to supply a list of applicable legislation, and it is possible that this list may be incomplete. However, when it comes to our attention that existing or new legislation allows a Requester access on a basis other than as set out in PAIA, we shall update the list accordingly. If a Requester believes that a right of access to a record exists in terms of other legislation listed above or any other legislation, the Requester is required to indicate what legislative right the request is based on, to allow the Information Officer the opportunity of considering the request in light thereof.

- 9.2. It is further recorded that the accessibility of documents and records may be subject to the grounds of refusal set out in this PAIA Manual.

## **10. Detail to Facilitate a Request for Access to a Record of Gooderson Leisure Corporation Proprietary Limited and its Subsidiaries [Section 51(1) (e)]**

- 10.1 The requester must comply with all the procedural requirements contained in PAIA relating to the request for access to a record.
- 10.2 The requester is required to complete the prescribed form provided in Appendix A. This completed form, along with the applicable request fee and deposit (if necessary), must be submitted to the Information Officer. Submissions can be made by postal mail, in person at the physical address, or via email, as detailed in Clause 5 above
- 10.3 The prescribed form must be filled in with sufficient information to enable the Information Officer to identify:
- a. the record or records requested; and
  - b. the identity of the requester.
- 10.4 The requester must indicate the preferred method of access (whether physical or electronic) and provide a postal or e-mail address within the Republic for correspondence.
- 10.5 The requester must state that he/she requires the information in order to exercise or protect a right, and clearly state what the nature of the right is so to be exercised or protected. The requester must clearly specify why the record is necessary to exercise or protect such a right (section 53(2)(d)).
- 10.6 Gooderson Leisure Corporation Proprietary Limited and its Subsidiaries will process the request within 30 (thirty) days, unless the requester has stated special reasons to the satisfaction of the Information Officer that circumstances dictate that the above time periods not be complied with.
- 10.7 The requester shall be advised whether access is granted or denied in writing. If, in addition, the requester requires the reasons for the decision in any other manner, the requester will be obliged to state which manner and the particulars required.
- 10.8 If a request is made on behalf of another person, then the requester must submit proof of the capacity in which the requester is making the request to the reasonable satisfaction of the Information Officer (section 53(2)(f)).
- 10.9 If an individual is unable to complete the prescribed form because of illiteracy or disability, such a person may make the request orally.
- 10.10 The requester must pay the prescribed fee, before any further processing can take place.
- 10.11 All information as listed in clause 10 herein should be provided, failing which the process will be delayed until the required information is provided. The prescribed time periods will not commence until the requester has furnished all the necessary and required information. The Information Officer shall sever a record, if possible, and grant only access to that portion requested and which is not prohibited from being disclosed.

## **11. Refusal of Access to Records**

### **11.1 Grounds to Refuse Access**

A private body such as Gooderson Leisure Corporation Proprietary Limited and its Subsidiaries is entitled to refuse a request for information.

#### **11.1.1 The main grounds for Gooderson Leisure Corporation Proprietary Limited and its Subsidiaries to refuse a request for information relates to the:**

- a) Mandatory protection of the privacy of a third party who is a natural person or a deceased person (section 63) or a juristic person, as included in POPIA, which would involve the unreasonable disclosure of personal Information of that natural or juristic person;
- b) Mandatory protection of personal information and for disclosure of any personal information to, in addition to any other legislative, regulatory or contractual agreements, comply with the provisions of POPIA;
- c) Mandatory protection of the commercial information of a third party (section 64) if the record contains:
  - 1) Trade secrets of the third party;
  - 2) Financial, commercial, scientific or technical information which disclosure could likely cause harm to the financial or commercial interests of that third party;
  - 3) Information disclosed in confidence by a third party to Gooderson Leisure Corporation Proprietary Limited and its Subsidiaries, if the disclosure could put that third party at a disadvantage in negotiations or commercial competition;
- d) Mandatory protection of confidential information of third parties (section 65) if it is protected in terms of any agreement;
- e) Mandatory protection of the safety of individuals and the protection of property (section 66); and
- f) Mandatory protection of records which would be regarded as privileged in legal proceedings (section 67).

#### **11.1.2 The commercial activities (section 68) of a private body, such as Gooderson Leisure Corporation Proprietary Limited and its Subsidiaries, which may include:**

- a) Trade secrets of Gooderson Leisure Corporation Proprietary Limited and its Subsidiaries;
- b) Financial, commercial, scientific or technical information which disclosure could likely cause harm to the financial or commercial interests of Gooderson Leisure Corporation Proprietary Limited and its Subsidiaries;
- c) Information which, if disclosed could put Gooderson Leisure Corporation Proprietary Limited and its Subsidiaries at a disadvantage in negotiations or commercial competition;
- d) A computer program which is owned by Gooderson Leisure Corporation Proprietary Limited and its Subsidiaries, and which is protected by copyright;
- e) The research information (section 69) of Gooderson Leisure Corporation Proprietary Limited and its Subsidiaries or a third party, if its disclosure would disclose the identity of Gooderson Leisure Corporation Proprietary Limited and its Subsidiaries, the researcher or the subject matter of the research and would place the research at a serious disadvantage; and
- f) Any information, which may affect Gooderson Leisure Corporation Proprietary Limited and its Subsidiaries Share Price or impact compliance with JSE listing requirements.

- 11.1.3 Requests for information that are clearly frivolous or vexatious, or which involve an unreasonable diversion of resources shall be refused.
- 11.1.4 All requests for information will be assessed on their own merits and in accordance with the applicable legal principles and legislation.
- 11.1.5 If a requested record cannot be found or if the record does not exist, the Information Officer shall, by way of an affidavit or affirmation, notify the requester that it is not possible to give access to the requested record. Such a notice will be regarded as a decision to refuse a request for access to the record concerned for the purpose of PAIA. If the record 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 the Information Officer refuses access to such record.

## **12) Remedies Available when Gooderson Leisure Corporation Proprietary Limited and its Subsidiaries refuses a request**

### **12.1) Internal Remedies**

Gooderson Leisure Corporation Proprietary Limited and its Subsidiaries does not have internal appeal procedures. The decision made by the Information Officer is final. Requesters will have to exercise such external remedies at their disposal if the request for information is refused, and the requestor is not satisfied with the answer supplied by the Information Officer.

### **12.2) External Remedies**

- 12.2.1) A requestor that is dissatisfied with the Information Officer's refusal to disclose information, may within 30 (thirty) days of notification of the decision, apply to a Court for relief.
- 12.2.2) A third party dissatisfied with the Information Officer's decision to grant a request for information, may within 30 (thirty) days of notification of the decision, apply to a Court for relief.
- 12.2.3) For purposes of PAIA, the Courts that have jurisdiction over these applications are the Constitutional Court, the High Court or another court of similar status and a Magistrate's Court designated by the Minister of Justice and Constitutional Development and which is presided over by a designated Magistrate.

## **13) Access to Records Held by Gooderson Leisure Corporation Proprietary Limited and its Subsidiaries**

### **13.1) Prerequisites for Access by Personal/Other Requester**

- 13.1.1) Records held by Gooderson Leisure Corporation Proprietary Limited and its Subsidiaries may be accessed by requests only once the prerequisite requirements for access have been met.
- 13.1.2) A requester is any person making a request for access to a record of Gooderson Leisure Corporation Proprietary Limited and its Subsidiaries. There are two types of requesters:

#### **a) Personal Requester**

- 1) A personal requester is a requester who is seeking access to a record containing personal information about the requester.
- 2) Gooderson Leisure Corporation Proprietary Limited and its Subsidiaries will voluntarily provide the requested information, or give access to any record with regard to the requester's personal information. The prescribed fee for reproduction of the information requested will be charged.

**b) Other Requester**

- 1) This requester (other than a personal requester) is entitled to request access to information of third parties.
- 2) In considering such a request, Gooderson Leisure Corporation Proprietary Limited and its Subsidiaries will adhere to the provisions of both PAIA and POPIA. Section 71 requires that the Information Officer take all reasonable steps to inform a third party to whom the requested record relates of the request, informing him/her that he/she may make a written or oral representation to the Information Officer why the request should be refused or, where required, give written consent for the disclosure of the information.

Gooderson Leisure Corporation Proprietary Limited and its Subsidiaries is not obliged to voluntarily grant access to such records. The requester must fulfil the requirements of PAIA as stipulated in Chapter 5; Part 3, including the payment of a request and access fee.

**14) Prescribed Fees [Section 51 (1) (f)]**

**14.1) Fees Provided by PAIA**

14.1.1 PAIA provides for two types of fees, namely:

- a) A request fee, which is a form of administration fee to be paid by all requesters except personal requesters, before the request is considered and is not refundable; and
- b) An access fee, which is paid by all requesters in the event that a request for access is granted. This fee is inclusive of costs involved by the private body in obtaining and preparing a record for delivery to the requester.

14.1.2) When the request is received by the Information Officer, such officer shall by notice require the requester, other than a personal requester, to pay the prescribed request fee, before further processing of the request (section 54(1)).

14.1.3) If the search for the record has been made and the preparation of the record for disclosure, including arrangement to make it available in the requested form, requires more than the hours prescribed in the regulations for this purpose, the Information Officer shall notify the requester to pay as a deposit the prescribed portion of the access fee which would be payable if the request is granted.

14.1.4) The Information Officer shall withhold a record until the requester has paid the fees as indicated below.

14.1.5) A requester whose request for access to a record has been granted, must pay an access fee that is calculated to include, where applicable, the request fee, the process fee for reproduction and for search and 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 requested form.

14.1.6) If a deposit has been paid in respect of a request for access, which is refused, then the Information Officer concerned must repay the deposit to the requester.

## 15) Other Fees

### 15.1) Reproduction Fee

Where Gooderson Leisure Corporation Proprietary Limited and its Subsidiaries has voluntarily provided the Minister with a list of categories of records that will automatically be made available to any person requesting access thereto, the only charge that may be levied for obtaining such records, will be a fee for reproduction of the record in question.

<b>Reproduction of Information Fees</b>	<b>Fees to be Charged</b>
Information in an A-4 size page photocopy or part thereof	R1,10
A printed copy of an A4-size page or part thereof	R0,75
A copy in computer-readable format, for example: Compact disc / USB Flash Drive	R70,00
A transcription of visual images, in an A4-size page or part thereof	R40,00
A copy of visual images	R60,00
A transcription of an audio record for an A4-size page or part thereof	R20,00
A copy of an audio record	R30,00

### 15.2) Request Fees

Where a requester submits a request for access to information held by an institution on a person other than the requester himself/herself, a request fee in the amount of R50.00 (fifty Rand) is payable upfront before the institution will further process the request received.

### 15.3) Access Fees

- 15.3.1)** An access fee is payable in all instances where a request for access to information is granted, except in those instances where payment of an access fee is specially excluded in terms of the Act or an exclusion is determined by the Minister in terms of section 54(8).

<b>Access of Information Fees</b>	<b>Fees to be Charged</b>
Information in an A-4 size page photocopy or part thereof	R1,10
A printed copy of an A4-size page or part thereof	R0,75
A copy in computer-readable format, for example: Stiffy disc / Compact disc / USB Flash Drive	R70,00
A transcription of visual images, in an A4-size page or part thereof	R40,00
A copy of visual images	R60,00
A transcription of an audio record for an A4-size page or part thereof	R20,00
A copy of an audio record	R30,00

The applicable access fees which will be payable are:

<b>Access of Information Fees</b>	<b>Fees to be Charged</b>
Information in an A-4 size page photocopy or part thereof	R1,10
A printed copy of an A4-size page or part thereof	R0,75
A copy in computer-readable format, for example: Stiffy disc / Compact disc / USB Flash Drive	R70,00
A transcription of visual images, in an A4-size page or part thereof	R40,00
A copy of visual images	R60,00
A transcription of an audio record for an A4-size page or part thereof	R20,00
A copy of an audio record	R30,00*
*Per hour or part of an hour reasonably required for such search.	

## **15.4     Deposits**

- 15.4.1     Where Gooderson Leisure Corporation Proprietary Limited and its Subsidiaries receives a request for access to information held on a person other than the requester himself/herself and the Information Officer upon receipt of the request is of the opinion that the preparation of the required record of disclosure will take more than 6 (six) hours, a deposit is payable by the requester.
- 15.4.2     The amount of the deposit is equal to 50% (fifty percent) of the amount of the applicable access fee.

## **15.5     Collection Fees**

- 15.5.1     The initial "request fee" of R50.00 (fifty Rand) should be deposited into the bank account below and a copy of the deposit slip, application form and other correspondence / documents, forwarded to the Information Officer via e-mail.
- 15.5.2     The officer will collect the initial "request fee" of applications received directly by the Information Officer via email.
- 15.5.3     All fees are subject to change as allowed for in the Act and as a consequence such escalations may not always be immediately available at the time of the request being made. Requesters shall be informed of any changes in the fees prior to making a payment.

## **16       Decision**

- 16.1       Time Allowed to Institution
- 16.1.1     Gooderson Leisure Corporation Proprietary Limited and its Subsidiaries will, within 30 (thirty) days of receipt of the request, decide whether to grant or decline the request and give notice with reasons (if required) to that effect.
- 16.1.2     The 30 (thirty) day period within which Gooderson Leisure Corporation Proprietary Limited and its Subsidiaries has to decide whether to grant or refuse the request, may be extended for a further period of not more than (30) thirty days if the request is for a large amount of information, or the request requires a search for information held at another office of Gooderson Leisure Corporation Proprietary Limited and its Subsidiaries and the information cannot reasonably be obtained within the original 30 (thirty) day period.
- 16.1.3     Gooderson Leisure Corporation Proprietary Limited and its Subsidiaries will notify the requester in writing should an extension be sought.

## **17.     Protection of Personal Information that is processed by Gooderson Leisure Corporation Proprietary Limited and its Subsidiaries**

- 17.1       Chapter 3 of POPIA provides for the minimum Conditions for Lawful Processing of Personal Information by a Responsible Party. These conditions may not be deviated from unless specific exclusions apply as outlined in POPIA.
- 17.2       Gooderson Leisure Corporation Proprietary Limited and its Subsidiaries needs Personal Information relating to both individual and juristic persons in order to carry out its business and organisational functions. The manner in which this information is Processed and the purpose for which it is Processed is determined by Gooderson Leisure Corporation Proprietary Limited and its Subsidiaries. Gooderson Leisure Corporation Proprietary Limited and its Subsidiaries is accordingly a Responsible Party for the purposes of POPIA and will ensure that the Personal Information of a Data Subject:

- 17.2.1 Is processed lawfully, fairly and transparently. This includes the provision of appropriate information to Data Subjects when their data is collected by Gooderson Leisure Corporation Proprietary Limited and its Subsidiaries, in the form of privacy or data collection notices. Gooderson Leisure Corporation Proprietary Limited and its Subsidiaries must also have a legal basis (for example, consent) to process Personal Information;
- 17.2.2 Is processed only for the purposes for which it was collected;
- 17.2.3 Will not be processed for a further purpose unless that processing is compatible with the original purpose.
- 17.2.4 Is adequate, relevant and not excessive for the purposes for which it was collected;
- 17.2.5 Is accurate and kept up to date;
- 17.2.6 Will not be kept for longer than necessary;
- 17.2.7 Is processed in accordance with integrity and confidentiality principles;
- 17.2.8 Is safeguarded which includes physical and organisational measures to ensure that Personal Information, in both physical and electronic form, are subject to an appropriate level of security when stored, used and communicated by Gooderson Leisure Corporation Proprietary Limited and its Subsidiaries, in order to protect against access and acquisition by unauthorised persons and accidental loss, destruction or damage;
- 17.2.9 Is processed in accordance with the rights of Data Subjects, where applicable.

### **17.3 Data Subjects have the right to:**

- 17.3.1 Be notified that their Personal Information is being collected by Gooderson Leisure Corporation Proprietary Limited and its Subsidiaries. The Data Subject also has the right to be notified in the event of a data breach;
- 17.3.2 Know whether Gooderson Leisure Corporation Proprietary Limited and its Subsidiaries holds Personal Information about them, and to access that information. Any request for information must be handled in accordance with the provisions of this PAIA Manual;
- 17.3.3 Request the correction or deletion of inaccurate, irrelevant, excessive, out of date, incomplete, misleading or unlawfully obtained personal information;
- 17.3.4 Object to Gooderson Leisure Corporation Proprietary Limited and its Subsidiaries use of their Personal Information and request the deletion of such Personal Information (deletion would be subject to Gooderson Leisure Corporation Proprietary Limited and its Subsidiaries record keeping requirements);
- 17.3.5 Object to the processing of Personal Information for purposes of direct marketing by means of unsolicited electronic communications; and
- 17.3.6 Complain to the Information Regulator regarding an alleged infringement of any of the rights protected under POPIA and to institute civil proceedings regarding the alleged non-compliance with the protection of his, her or its personal information.

#### **17.4) Purpose of the Processing of Personal Information by the Company**

As outlined above, Personal Information may only be processed for a specific purpose. The purposes for which Gooderson Leisure Corporation Proprietary Limited and its Subsidiaries processes or will process Personal Information is set out in Part 1 of Appendix C.

#### **17.5) Categories of Data Subjects and Personal Information / Special Personal Information relating thereto**

As per section 1 of POPIA, a Data Subject may either be a natural or a juristic person. Part 2 of Appendix C sets out the various categories of Data Subjects in terms of which Gooderson Leisure Corporation Proprietary Limited and its Subsidiaries Processes Personal Information and the types of Personal Information relating thereto.

#### **17.6) Recipients of Personal Information**

Part 3 of Appendix C outlines the recipients to whom Gooderson Leisure Corporation Proprietary Limited and its Subsidiaries may provide a Data Subject's Personal Information.

#### **17.7 Cross-border flows of Personal Information**

17.7.1) Section 72 of POPIA provides that Personal Information may only be transferred out of the Republic of South Africa if the:

- a) Recipient country can offer such data an "adequate level" of protection. This means that its data privacy laws must be substantially similar to the Conditions for Lawful Processing as contained in POPIA; or
- b) Data Subject consents to the transfer of their Personal Information; or
- c) Transfer is necessary for the performance of a contractual obligation between the Data Subject and the Responsible Party; or
- d) Transfer is necessary for the performance of a contractual obligation between the Responsible Party and a third party, in the interests of the Data Subject; or
- e) The transfer is for the benefit of the Data Subject, and it is not reasonably practicable to obtain the consent of the Data Subject, and if it were, the Data Subject, would in all likelihood provide such consent.

17.7.2 Part 4 of Appendix C sets out the cross-border transfers of Personal Information which Gooderson Leisure Corporation Proprietary Limited and its Subsidiaries requires and the conditions applicable thereto.

#### **17.8 Description of information security measures to be implemented by Gooderson Leisure Corporation Proprietary Limited and its Subsidiaries**

Part 5 of Appendix C sets out the types of security measures implemented by Gooderson Leisure Corporation Proprietary Limited and its Subsidiaries in order to ensure that Personal Information is respected and protected. A preliminary assessment of the suitability of the information security measures implemented or to be implemented by Gooderson Leisure Corporation Proprietary Limited and its Subsidiaries may be conducted in order to ensure that the Personal Information that is processed by Gooderson Leisure Corporation Proprietary Limited and its Subsidiaries is safeguarded and Processed in accordance with the Conditions for Lawful Processing.

## **17.9) Objection to the Processing of Personal Information by a Data Subject**

Section 11 (3) of POPIA and regulation 2 of the POPIA Regulations provides that a Data Subject may, at any time object to the Processing of his/her/its Personal Information in the prescribed form attached to this PAIA Manual as Appendix D subject to exceptions contained in POPIA.

## **17.10) Request for correction or deletion of Personal Information**

Section 24 of POPIA and regulation 3 of the POPIA Regulations provides that a Data Subject may request for their Personal Information to be corrected/deleted in the prescribed form attached as Appendix E to this PAIA Manual.

## **18) Availability and Updating of the PAIA Manual**

- 18.1 Gooderson Leisure Corporation Proprietary Limited and its Subsidiaries will update this PAIA Manual at such intervals as may be deemed necessary by PAIA, POPIA or any other applicable law;
  - 18.2 This PAIA Manual of Gooderson Leisure Corporation Proprietary Limited and its Subsidiaries is available to view at its premises and on its website [www.goodersonleisure.co.za](http://www.goodersonleisure.co.za)
-

**PRESCRIBED FORM TO BE COMPLETED BY A REQUESTER****REPUBLIC OF SOUTH AFRICA****FORM 02 - REQUEST FOR ACCESS TO RECORD OF PRIVATE BODY**

(Section 53(1) of the Promotion of Access to Information Act, 2000 (Act No. 2 of 2000))

[Regulation 7]

**TO:** The Information Officer  
**Gooderson Tropicana Hotel**  
**85 O R Tambo Parade**  
**Durban**  
**4001**

Email: [glcfin@goodersons.co.za](mailto:glcfin@goodersons.co.za)

**PLEASE NOTE:**

- 1. Proof of identity must be attached by the requester.**
- 2. If requests made on behalf of another person, proof of such authorisation, must be attached to this form.**

Mark with an "X"

<b>Request is made in my own name</b>		<b>Request is made on behalf of another person.</b>	
---------------------------------------	--	---	--

<b>PERSONAL INFORMATION</b>					
Full Names					
Identity Number					
Capacity in which request is made <i>(when made on behalf of another person)</i>					
Postal Address					
Street Address					
E-mail Address					
Contact Numbers	Tel. (W):		Cellular:		
Full names of person on whose behalf request is made <i>(if applicable)</i> :					
Identity Number					
Postal Address					
Street Address					
E-mail Address					
Contact Numbers	Tel. (W)		Cellular:		

**PARTICULARS OF RECORD REQUESTED**

Provide full particulars of the record to which access is requested, including the reference number if that is known to you, to enable the record to be located. (If the provided space is inadequate, please continue on a separate page and attach it to this form. All additional pages must be signed.)

Description of record or relevant part of the record:	
Reference number, if available	
Any further particulars of record	

**TYPE OF RECORD**

(Mark the applicable box with an "X")

Record is in written or printed form	
Record comprises virtual images (this includes photographs, slides, video recordings, computer-generated images, sketches, etc)	
Record consists of recorded words or information which can be reproduced in sound	
Record is held on a computer or in an electronic, or machine-readable form	

**MANNER OF ACCESS** (Mark the applicable box with an "X")

Personal inspection of record at registered address of public/private body (including listening to recorded words, information which can be reproduced in sound, or information held on computer or in an electronic or machine-readable form)	
Postal services to postal address	
Postal services to street address	
Courier service to street address	
Facsimile of information in written or printed format (including transcriptions)	
E-mail of information (including soundtracks if possible)	
Cloud share/file transfer	
Preferred language (Note that if the record is not available in the language you prefer, access may be granted in the language in which the record is available)	

**PARTICULARS OF RIGHT TO BE EXERCISED OR PROTECTED**

If the provided space is inadequate, please continue on a separate page and attach it to this Form. The requester must sign all the additional pages.

Indicate which right is to be exercised or protected	
Explain why the record requested is required for the exercise or protection of the aforementioned right:	

**FEES**

- a) A request fee must be paid before the request will be considered.
- b) You will be notified of the amount of the access fee to be paid.
- c) The fee payable for access to a record depends on the form in which access is required and the reasonable time required to search for and prepare a record.
- d) If you qualify for exemption of the payment of any fee, please state the reason for exemption

Reason	

You will be notified in writing whether your request has been approved or denied and if approved the costs relating to your request, if any. Please indicate your preferred manner of correspondence:

Postal address	Facsimile	Electronic communication (Please specify)

Signed at \_\_\_\_\_ this \_\_\_\_\_ day of \_\_\_\_\_ 20\_\_\_\_\_.

\_\_\_\_\_  
Signature of requester / person on  
whose behalf request is made

**FOR OFFICIAL USE**

Reference number:	
Request received by: (Name and Surname of Information Officer)	
Date received:	
Access fees:	
Deposit (if any):	

\_\_\_\_\_  
Signature of Information Officer

**OUTCOME OF REQUEST AND OF FEES PAYABLE – FORM 03****[Regulation 8]****Please note:****1. If your request is granted the:**

- (a) **amount of the deposit, (if any), is payable before your request is processed; and**
- (b) **requested record/portion of the record will only be released once proof of full payment is received.**

**2. Please use the reference number hereunder in all future correspondence.**

<b>Reference Number:</b>	
--------------------------	--

<b>To:</b>	
------------	--

Your request dated \_\_\_\_/\_\_\_\_/20\_\_\_\_ refers

**1) You requested:**

	Personal inspection of information at registered address of public/private body ( <i>including listening to recorded words, information which can be reproduced in sound, or information held on computer or in an electronic or machine-readable form</i> ) is free of charge. You are required to make an appointment for the inspection of the information and to bring this Form with you. If you then require any form of reproduction of the information, you will be liable for the fees prescribed below.	
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**2) You requested:**

	Printed copies of the information ( <i>including copies of any virtual images, transcriptions and information held on computer or in an electronic or machine-readable form</i> )	
	Written or printed transcription of virtual images ( <i>this includes photographs, slides, video recordings, computer-generated images, sketches, etc</i> )	
	Transcription of soundtrack ( <i>written or printed document</i> )	
	Copy of information on flash drive ( <i>including virtual images and soundtracks</i> )	
	Copy of information on compact disc drive ( <i>including virtual images and soundtracks</i> )	
	Copy of record saved on cloud storage server	

**3) To be submitted:**

	Postal services to postal address	
	Postal services to street address	
	Courier service to street address	
	Facsimile of information in written or printed format ( <i>including transcriptions</i> )	
	E-mail of information ( <i>including soundtracks if possible</i> )	
	Cloud share/file transfer	
	Preferred language: ( <i>Note that if the record is not available in the language you prefer, access may be granted in the language in which the record is available</i> )	

**Kindly note that your request has been:**

<b>Approved</b>	
<b>Denied for the following reasons:</b>	

**4. Fees payable with regards to your request:**

<b>Item</b>	<b>Cost per A4-size page or part thereof / item</b>	<b>Number of pages / items</b>	<b>Total</b>
Photocopy			
Printed copy			
For a copy in a computer-readable form on:			
(i) Flash drive			
• To be provided by requestor	R40.00		
(ii) Compact disc	R40.00		
• If provided by requestor	R60.00		
• If provided to the requestor			
For a transcription of visual images per A4-size page	Service to be outsourced. Will depend on the quotation of the service provider		
Copy of visual images			
Transcription of an audio record, per A4-size	R24.00		
Copy of an audio record			
(i) Flash drive			
• To be provided by requestor	R40.00		
(ii) Compact disc			
• If provided by requestor	R40.00		
• If provided to the requestor	R60. 00		
Postage, e-mail or any other electronic transfer:	Actual costs		
<b>TOTAL:</b>			

5. Deposit payable (if search exceeds six hours):

Yes ☐ No ☐

Hours of search		Amount of deposit <i>(calculated on one third of total amount per request)</i>	
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The amount must be paid into the following Bank account:

Name of Bank:	
Name of account holder:	
Account number:	
Branch Code:	
Reference Nr:	
Submit proof of payment to:	

Signed at \_\_\_\_\_ this \_\_\_\_\_ day of \_\_\_\_\_ 20 \_\_\_\_\_

\_\_\_\_\_  
Information Officer

## **APPENDIX C: PART 1 -**

### **PROCESSING OF PERSONAL INFORMATION IN ACCORDANCE WITH POPIA**

#### **For clients (including guests of any Gooderson Leisure Corporation Proprietary Limited and its Subsidiaries)**

- a) Making hotel reservations for clients.
- b) Report to Immigration Services in accordance with Immigration Act.
- c) Performing duties in terms of any agreement with clients.
- d) Make, or assist in making, credit decisions about clients.
- e) Operate and manage clients' accounts and manage any application, agreement or correspondence clients may have with Gooderson Leisure Corporation Proprietary Limited and its Subsidiaries.
- f) Communicating (including direct marketing) with clients by email, SMS, letter, telephone or in any other way about Gooderson Leisure Corporation Proprietary Limited and its Subsidiaries products and services, promotions and competitions, unless clients indicate otherwise.
- g) To form a view of clients as individuals and to identify, develop or improve products that may be of interest to clients.
- h) Carrying out market research, business and statistical analysis.
- i) Performing other administrative and operational purposes including the testing of systems.
- j) Recovering any debt clients may owe to Gooderson Leisure Corporation Proprietary Limited and its Subsidiaries.
- k) Complying with Gooderson Leisure Corporation Proprietary Limited and its Subsidiaries regulatory and other obligations inclusive of the Immigration Act, The Consumer Protection Act and the National Credit Act.
- l) Any other reasonably required purpose relating to the Gooderson Leisure Corporation Proprietary Limited and its Subsidiaries business.

#### **For prospective clients (including prospective guests of any Gooderson Leisure Corporation Proprietary Limited and its Subsidiaries)**

- a) Making hotel reservations.
- b) Verifying and updating information.
- c) Pre-credit scoring.
- d) Direct marketing.
- e) Communicating (including direct marketing) with clients by email, SMS, letter, telephone or in any other way about Gooderson Leisure Corporation Proprietary Limited and its Subsidiaries products and services, promotions and competitions, unless clients indicate otherwise.
- f) Any other reasonably required purpose relating to the processing of a prospect's personal information reasonably related to the Gooderson Leisure Corporation Proprietary Limited and its Subsidiaries business.

### **For employees**

- a) The same purposes as for clients (above).
- b) Verification of applicant employees' information during recruitment process.
- c) General matters relating to employees:
  - i) Pension
  - ii) Medical aid
  - iii) Payroll
  - iv) Disciplinary action
  - v) Training
- d) Any other reasonably required purpose relating to the employment or possible employment relationship.

### **For vendors /suppliers /other businesses**

- a) Verifying information and performing checks.
- b) Purposes relating to the agreement or business relationship or potential agreement or business relationships between the Parties.
- c) Payment of invoices
- d) Complying with Gooderson Leisure Corporation Proprietary Limited and its Subsidiaries regulatory and other obligations; and
- e) Any other reasonably required purpose relating to the Gooderson Leisure Corporation Proprietary Limited and its Subsidiaries business.

In relation to the aforementioned any legitimate interest of Gooderson Leisure Corporation Proprietary Limited and its Subsidiaries as is detailed in Gooderson Leisure Corporation Proprietary Limited and its Subsidiaries Privacy Policy published on its websites: [www.goodersonleisure.co.za](http://www.goodersonleisure.co.za) or the Gooderson Leisure Corporation Proprietary Limited.

## **APPENDIX C PART 2 -**

### **CATEGORIES OF DATA SUBJECTS AND CATEGORIES OF PERSONAL INFORMATION RELATING THERETO**

#### **Employees**

- a) Name and contact details.
- b) Identity number and identity documents including passports.
- c) Employment history and references.
- d) Banking and financial details.
- e) Details of payments to third parties (deductions from salary).
- f) Employment contracts.
- g) Employment equity plans.
- h) Medical aid records.
- i) Pension Fund records.
- j) Remuneration/salary records.
- k) Performance appraisals.
- l) Disciplinary records.
- m) Leave records.
- n) Training records.

#### **Clients and prospective clients / guests (which may include employees and prospective employees)**

- a) Postal and/or street address.
- b) Title and name.
- c) Contact numbers and/or e-mail address.
- d) Nationality.
- e) Identity document, birth certificate or passport
- f) Financial information.
- g) Browsing habits and click patterns on Gooderson Leisure Corporation Proprietary Limited and its Subsidiaries websites as per the Gooderson Leisure Corporation Proprietary Limited and its Subsidiaries Privacy and Cookie Policy
- h) Responses to Surveys and Competitions and Promotions
- i) Customer comments and service reviews

#### **Vendors /suppliers / other businesses**

- a) Name, address and contact details
- b) Identity and legal entity details and applicable statutory information.
- c) Banking and financial information.
- d) Information about products or services.
- e) Browsing habits and click patterns on Gooderson Leisure Corporation Proprietary Limited and its Subsidiaries websites as per the Gooderson Leisure Corporation Proprietary Limited and its Subsidiaries Privacy and Cookie Policy.
- f) Other information not specified, reasonably required to be processed for business operations.

## **APPENDIX C: PART 3 - RECIPIENTS OF PERSONAL INFORMATION**

- a) Any firm, organisation or person that Gooderson Leisure Corporation Proprietary Limited and its Subsidiaries uses to collect payments and recover debts or to provide a service on its behalf;
- b) Any firm, organisation or person that/who provides Gooderson Leisure Corporation Proprietary Limited and its Subsidiaries with products or services;
- c) Any payment system Gooderson Leisure Corporation Proprietary Limited and its Subsidiaries uses;
- d) Regulatory and governmental authorities or ombudsmen, or other authorities, including immigration and tax authorities, where Gooderson Leisure Corporation Proprietary Limited and its Subsidiaries has a duty to share information;
- e) Third parties to whom payments are made on behalf of employees;
- f) Financial institutions from whom payments are received on behalf of data subjects;
- g) Any other Operator not specified;
- h) Employees, contractors and temporary staff; and
- i) Agents.

## **APPENDIX C: PART 4 – CROSS BORDER TRANSFERS OF PERSONAL INFORMATION**

Personal Information may be transmitted trans-border to Gooderson Leisure Corporation Proprietary Limited and its Subsidiaries service providers in other countries, and Personal Information may be stored in data servers hosted outside South Africa, which may not have adequate data protection laws. Gooderson Leisure Corporation Proprietary Limited and its Subsidiaries will endeavour to ensure that its service providers will make all reasonable efforts to secure the data and Personal Information.

Gooderson Leisure Corporation Proprietary Limited and its Subsidiaries will transfer Personal Information outside South Africa in the following circumstances:

- a) a client reservation is with a Gooderson Leisure Corporation Proprietary Limited and its Subsidiaries located internationally;
- b) where Gooderson Leisure Corporation Proprietary Limited and its Subsidiaries is required to make contact on behalf of client outside South Africa;
- c) where electronic services and resources are based outside South Africa for example banking and credit card payment services;
- d) where there is an international element to a reservation.

Gooderson Leisure Corporation Proprietary Limited and its Subsidiaries will take steps to ensure that, wherever possible, the transfer complies with POPIA and endeavour to ensure that our host providers are subject to laws, or policies, which uphold principles for the reasonable processing of information substantially similar to the POPIA to ensure adequate protection of Personal Information.

For further information please contact the Information Officer.

## **APPENDIX C: PART 5 – DESCRIPTION OF INFORMATION SECURITY MEASURES**

Gooderson Leisure Corporation Proprietary Limited and its Subsidiaries undertakes to institute and maintain the data protection measures to accomplish the following objectives outlined below. The details given are to be interpreted as examples of how to achieve an adequate data protection level for each objective. Gooderson Leisure Corporation Proprietary Limited and its Subsidiaries may use alternative measures and adapt to technological security development, as needed, provided that the objectives are achieved.

### **1) Access Control of Persons**

Gooderson Leisure Corporation Proprietary Limited and its Subsidiaries shall implement suitable measures in order to prevent unauthorized persons from gaining access to the data processing equipment where the data are processed.

### **2) Data Media Control**

Gooderson Leisure Corporation Proprietary Limited and its Subsidiaries undertakes to implement suitable measures to prevent the unauthorized manipulation of media, including reading, copying, alteration or removal of the data media used by Gooderson Leisure Corporation Proprietary Limited and its Subsidiaries and containing personal data of Customers.

### **3) Access Control to Data**

Gooderson Leisure Corporation Proprietary Limited and its Subsidiaries represents that the persons entitled to use Gooderson Leisure Corporation Proprietary Limited and its Subsidiaries data processing system are only able to access the data within the scope and to the extent covered by their respective access permissions (authorisation).

### **4) Transmission Control**

Gooderson Leisure Corporation Proprietary Limited and its Subsidiaries shall be obliged to enable the verification and tracing of the locations/destinations to which the personal information is transferred by utilization of Gooderson Leisure Corporation Proprietary Limited and its Subsidiaries data communication equipment/devices.

### **5) Transport Control**

Gooderson Leisure Corporation Proprietary Limited and its Subsidiaries shall implement suitable measures to prevent Personal Information from being read, copied, altered or deleted by unauthorized persons during the transmission thereof or during the transport of the data media.

### **6) Organisation Control**

Gooderson Leisure Corporation Proprietary Limited and its Subsidiaries shall maintain its internal organisation in a manner that meets the requirements of this Manual.

**APPENDIX D: OBJECTION TO THE PROCESSING OF PERSONAL INFORMATION IN TERMS OF SECTION 11(3) OF THE PROTECTION OF PERSONAL INFORMATION ACT, 2013**

**REGULATIONS IN RESPECT OF THE PROTECTION OF PERSONAL INFORMATION ACT, 2018**

[Regulation 2]

**Note:**

- 1 Affidavits or other documentary evidence as applicable in support of the objection may be attached.
- 2 If the space provided for in this Form is inadequate, submit information as an Annexure to this Form and sign each page.
- 3 Complete as is applicable

**A) DETAILS OF DATA SUBJECT**

	Name(s) and surname/ registered name of data subject:	
	Unique Identifier/ Identity Number	
	Residential, postal or business address:	
	Contact number(s):	
	E-mail address:	

**B) DETAILS OF RESPONSIBLE PARTY**

	Name(s) and surname/ registered name of data subject:	
	Residential, postal or business address:	
	Contact number(s):	
	E-mail address:	

**C) REASONS FOR OBJECTION IN TERMS OF SECTION 11(1)(d) to (f) (Please provide detailed reasons for the objection)**

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Signed at \_\_\_\_\_ on this \_\_\_\_\_ day of \_\_\_\_\_ 20\_\_\_\_\_

\_\_\_\_\_  
**Signature of Data Subject/Designated Person**

**APPENDIX E: REQUEST FOR CORRECTION OR DELETION OF PERSONAL INFORMATION OR DESTROYING OR DELETION OF RECORD OF PERSONAL INFORMATION IN TERMS OF SECTION 24(1) OF THE PROTECTION OF PERSONAL INFORMATION ACT, 2013**

**REGULATIONS RELATING TO THE PROTECTION OF PERSONAL INFORMATION, 2018**

**[Regulation 3]**

**Note:**

1. Affidavits or other documentary evidence as applicable in support of the request may be attached.
2. If the space provided for in this Form is inadequate, submit information as an Annexure to this Form and sign each page.
3. Complete as is applicable.

Mark the appropriate box with an "X". Request for:

Correction or deletion of the personal information about the data subject which is in possession or under the control of the responsible party.	
Destroying or deletion of a record of personal information about the data subject which is in possession or under the control of the responsible party and who is no longer authorised to retain the record of information	

**A) DETAILS OF DATA SUBJECT**

	Name(s) and surname/ registered name of data subject:	
	Unique Identifier/ Identity Number	
	Residential, postal or business address:	
	Contact number(s):	
	E-mail address:	

**B) DETAILS OF RESPONSIBLE PARTY**

	Name(s) and surname/ registered name of data subject:	
	Residential, postal or business address:	
	Contact number(s):	
	E-mail address:	

**C) REASONS FOR OBJECTION IN TERMS OF SECTION 11(1)(d) to (f) (Please provide detailed reasons for the objection)**

<b>D)</b>	Reasons for *Correction or Deletion of the Personal Information about the Data Subject in Terms of Section 24(1)(a) which is in Possession or Under the Control of the Responsible Party; and or Reasons for Destruction or Deletion of a Record of Personal Information about the Data Subject in Terms of Section 24(1)(b) which the Responsible Party is no longer Authorised to Retain. (Please Provide Detailed Reasons for the Request).	
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Signed at \_\_\_\_\_ on this \_\_\_\_\_ day of \_\_\_\_\_ 20\_\_\_\_\_

\_\_\_\_\_  
**Signature of Data Subject/Designated Person**