



PAIA MANUAL OF THE SINGITA GROUP

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

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Singita Management Company (Pty) Ltd
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Non-Executive Directors: L. Rousseau | L. Kaae | P.C. Ehrenreich (USA) | M. Saunders (Alt)
Reg. No. 2005/032061/07

1. List of Acronyms and Abbreviations

1.1 “CEO” means Chief Executive Officer.

1.2 “CIO” means Chief Information Officer.

1.3 “DIO” means Deputy Information Officer.

1.4 “IO” means Information Officer.

1.5 “Minister” means the Minister of Justice and Correctional Services.

1.6 “PAIA” means the Promotion of Access to Information Act No. 2 of 2000, as amended.

1.7 “POPIA” means the Protection of Personal Information Act No. 4 of 2013.

1.8 “Regulator” means the Information Regulator established in terms of POPIA.

1.9 “Republic” means the Republic of South Africa.

2. PURPOSE OF THIS MANUAL

2.1 This Manual has been prepared in accordance with section 51 of PAIA and is published to provide members of the public with information on the records held by the Singita Group and the procedures to be followed in requesting access to such records.

2.2 This Manual is useful to members of the public to—

2.2.1 determine which records of the Singita Group are available without the need to submit a formal request in terms of PAIA;

2.2.2 obtain sufficient detail to enable a person to request access to records held by the Singita Group in accordance with PAIA;

2.2.3 know the categories of records of the Singita Group that are available in terms of other legislation;

2.2.4 understand the categories of data subjects and the purposes for which personal information is processed in accordance with POPIA; and

2.2.5 access the details of the Information Officer and the Deputy Information

Officer who are responsible for assisting with requests made under PAIA and POPIA.

3. CONTACT DETAILS OF THE INFORMATION OFFICER AND DEPUTY INFORMATION OFFICER

The contact details of the Information Officer are as follows:

3.1 Name: Mr Andre Pottas

3.2 Designation: Chief Information Officer and Information Officer

3.3 Telephone Number: 0824135192

3.4 Email Address: andre.p@singita.com

The contact details of the Deputy Information Officer are as follows:

3.5 Name: Ms Nhlalenhle Sukoluhle Mazibuko

3.6 Designation: Deputy Information Officer

3.7 Telephone Number: 062 034 6092

3.8 Email Address: suku.m@singita.com

NB. ALL REQUESTS FOR ACCESS TO INFORMATION SHALL BE RESPONDED TO WITHIN 30 (THIRTY) DAYS FROM THE DATE OF RECEIPT OF THE REQUEST, IN ACCORDANCE WITH THE PROMOTION OF ACCESS TO INFORMATION ACT, 2000 (PAIA). WHERE THE REQUEST CANNOT REASONABLY BE PROCESSED WITHIN 30 (THIRTY) DAYS, THE INFORMATION OFFICER MAY EXTEND THE PERIOD OF RESPONSE FOR A FURTHER 30 (THIRTY) DAYS, PROVIDED THAT THE REQUESTER IS NOTIFIED IN WRITING OF SUCH EXTENSION AND THE REASONS THEREFOR

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

4.1 The Information Regulator has, in terms of section 10(1) of PAIA, as amended, compiled a Guide on how to use PAIA ("the Guide"), in an easily comprehensible form and manner, to assist any person who wishes to exercise any right contemplated in PAIA and POPIA.

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

4.3 The Guide contains, among other matters—

4.3.1 the objects of PAIA and POPIA;

4.3.2 the contact details of Information Officers of public bodies and the Deputy Information Officers of both public and private bodies designated in terms of PAIA and POPIA;

4.3.3 the manner and form of requests for access to records of public bodies and private bodies;

4.3.4 the assistance available from the Information Officer of a public body and from the Regulator;

4.3.5 the remedies in law available regarding acts or failures to act in terms of PAIA and POPIA;

4.3.6 the provisions of sections 14 and 51 of PAIA requiring the compilation of manuals;

4.3.7 the provisions of sections 15 and 52 of PAIA dealing with voluntary disclosure of categories of records;

4.3.8 the notices issued under sections 22 and 54 of PAIA regarding fees; and

4.3.9 the regulations made in terms of section 92 of PAIA.

4.4 Members of the public may inspect or obtain a copy of the Guide from the office of the Information Regulator during normal working hours.

4.5 The Guide may also be obtained upon request to the Information Officer of the Singita Group, or from the website of the Regulator at <https://www.justice.gov.za/infoereg>.

4.6 A copy of the Guide is available in English and isiZulu for public inspection during normal office hours.

5. CATEGORIES OF RECORDS AUTOMATICALLY AVAILABLE

Category of Record	Type of Record	Available on Website	Available on Request
Corporate Governance	Company profile, mission statements and sustainability reports	Yes	Yes
ESG and Conservation	Environmental, social and governance reports, including diversity, equity and inclusion initiatives	Yes	Yes
Marketing	Brochures and other promotional material	Yes	Yes

6. CATEGORIES OF RECORDS AVAILABLE IN TERMS OF OTHER LEGISLATION

Category of Record	Applicable Legislation
Company incorporation and statutory records	Companies Act No. 71 of 2008
Tax records	Income Tax Act, Value Added Tax Act
Employment-related records	Labour Relations Act, Basic Conditions of Employment Act
Environmental and conservation compliance records	National Environmental Management Act, National Biodiversity Act

7. SUBJECTS AND CATEGORIES OF RECORDS HELD

7.1 Human resources records, including employment contracts, policies, payroll information and training records.

7.2 Financial records, including annual financial statements, budgets and tax records.

7.3 Governance records, including board resolutions, statutory registers and trust deeds.

7.4 Operational records, including lodge management policies, safety protocols and standard operating procedures.

7.5 Legal and compliance records, including contracts, non-disclosure agreements and POPIA compliance registers.

8. PROCESSING OF PERSONAL INFORMATION IN TERMS OF POPIA

8.1 The Singita Group processes personal information for purposes including guest and client management, human resources and payroll administration, supplier onboarding and procurement processes, and compliance with statutory obligations such as anti-money laundering and beneficial ownership reporting.

8.2 Categories of data subjects include clients, guests, employees, suppliers, contractors, shareholders and trust beneficiaries.

8.3 Recipients of personal information may include regulators, statutory authorities, banks, auditors, insurers, legal advisors and conservation partners.

8.4 In certain cases, personal information is transferred outside of the Republic for processing on secure cloud-based platforms such as Microsoft 365. Appropriate contractual and technical safeguards are in place.

8.5 The Singita Group implements security safeguards such as encryption, access controls, cybersecurity systems, and compliance with its POPIA and AI-use framework.

9. PROCEDURE FOR MAKING A REQUEST

9.1 In terms of Regulation 7.1 of the PAIA Regulations, 2021, any request for access to a record of the Singita Group must be made on **Form 2**. Requests submitted on repealed forms, including “Form A”, will not be accepted.

9.2 A copy of Form 2 is attached as Annexure A to this Manual and is also available from the Regulator’s website.

9.3 Requests must be submitted to the Information Officer or Deputy Information Officer. Requests by data subjects for access to, correction of, or deletion of personal information under section 23 of POPIA must also be made using Form 2.

10. RECORD OF REQUESTS

10.1 In terms of section 17 of PAIA, the Singita Group maintains a register of all requests for access to information received.

10.2 The register records whether a request was granted or refused, the identity of the requester, the nature of the request, the decision taken and the reasons for the decision.

10.3 This register is available for inspection by the Information Regulator upon request.

11. AVAILABILITY OF THE MANUAL

11.1 This PAIA Manual is available on the Singita Group website, at the Head Office during business hours, and from the Information Officer or the Deputy Information Officer on request.

11.2 Copies of the Manual may be provided electronically or in hard copy, subject to payment of the prescribed fees.

11.3 A copy of the Manual will also be made available to the Information Regulator upon request.

12. UPDATING OF THE MANUAL

12.1 The Information Officer will ensure that this Manual is reviewed annually or whenever there are material changes to the operations of the Singita Group, its data processing practices, or relevant legislation.

12.2 Updated versions will be lodged with the Information Regulator and published on the Group’s website.

Issued by:
Andre Pottas
Chief Information Officer
Singita Group