

MONTAGU COUNTRY HOTEL (PTY) LTD

PAIA MANUAL

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

Registration number: 1996/007545/07

Trading as: Montagu Country Hotel

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1. List of Acronyms and Abbreviations

- 1.1** CEO - Chief Executive Officer
- 1.2** DIO - Deputy Information Officer
- 1.3** IO - Information Officer
- 1.4** Minister - Minister of Justice and Correctional Services
- 1.5** PAIA - Promotion of Access to Information Act 2 of 2000, as amended
- 1.6** POPIA - Protection of Personal Information Act 4 of 2013
- 1.7** Regulator - Information Regulator
- 1.8** Republic - Republic of South Africa

2. Purpose of this PAIA Manual

This PAIA Manual is intended to assist members of the public to:

- 2.1** identify the categories of records held by Montagu Country Hotel (Pty) Ltd that are available without a formal PAIA request;
- 2.2** understand how to request access to records held by Montagu Country Hotel (Pty) Ltd;
- 2.3** understand the categories of records held by Montagu Country Hotel (Pty) Ltd and the legislation in terms of which certain records are kept;
- 2.4** access the relevant contact details of the Information Officer and Deputy Information Officer;
- 2.5** understand how to obtain the PAIA Guide issued by the Information Regulator;
- 2.6** understand how Montagu Country Hotel (Pty) Ltd processes personal information;

- 2.7 understand the categories of data subjects and categories of personal information processed;
- 2.8 understand the recipients or categories of recipients to whom personal information may be supplied;
- 2.9 understand whether personal information may be transferred or processed outside South Africa; and
- 2.10 understand the general security measures used to protect personal information.

3. Key Contact Details for Access to Information

3.1 Information Officer

Name: Colene Basson

Telephone: +27 (0)23 614 3125

Email: finance@montagucountryhotel.co.za

3.2 Deputy Information Officer

Name: Pierre-Jacques Basson

Telephone: +27 (0)23 614 3125

Email: finance@montagucountryhotel.co.za

3.3 General Access to Information Contact

Email: finance@montagucountryhotel.co.za

3.4 Head Office / Principal Place of Business

Name of private body: Montagu Country Hotel (Pty) Ltd

Registration number: 1996/007545/07

Postal address: P.O. Box 338, Montagu, 6720, South Africa

Physical address: 27 Bath Street, Montagu, Western Cape, 6720, South Africa

Telephone: +27 (0)23 614 3125

Email: finance@montagucountryhotel.co.za

Website: www.montagucountryhotel.co.za

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, updated and made available the Guide on how to use PAIA.

4.2 The Guide assists persons who wish to exercise any right contemplated in PAIA and POPIA.

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

4.4 The Guide contains, amongst other things, information about:

- the objects of PAIA and POPIA;
- the contact details of Information Officers and Deputy Information Officers;
- the manner and form of a request for access to a record;
- the assistance available from Information Officers and the Information Regulator;
- remedies available in law, including complaints to the Information Regulator and applications to court;
- the requirements for PAIA manuals;
- voluntary disclosure of categories of records;
- fees payable for requests for access to records; and
- regulations made in terms of PAIA.

4.5 A person who wishes to request access to a record of Montagu Country Hotel (Pty) Ltd must submit the prescribed PAIA request form to the Information Officer, Deputy Information Officer or head of the private body. The request must identify the record requested and the right the requester seeks to exercise or protect.

4.6 The prescribed request form is currently Form 02: Request for Access to Record. The outcome of a request and any fees payable may be communicated using the prescribed form. A requester may lodge a complaint with the Information Regulator where applicable.

4.7 The Guide may be obtained from the Information Regulator, from the Information Regulator's website, or upon request to the Information Officer.

4.8 A copy of the Guide is available for public inspection at the offices of Montagu Country Hotel (Pty) Ltd during normal office hours in the following two official languages: English and Afrikaans.

5. Categories of Records Available without a Formal PAIA Request

The following categories of records may be available without a formal PAIA request, either on the website or upon request:

Category of records	Types of records	Available on website	Available upon request
PAIA and privacy information	PAIA Manual and POPIA Privacy Notice	Yes	Yes
Public hotel information	Accommodation, facilities, restaurant and general guest information	Yes	Yes
Menus and promotional material	Published menus, specials, brochures and public marketing material	Yes	Yes
Contact information	Public contact details and business location information	Yes	Yes
Public-facing policies	Public-facing policies and notices, where published	Yes	Yes

Access to any other record may require a formal PAIA request.

6. Records Available in Accordance with Other Legislation

Montagu Country Hotel (Pty) Ltd may keep records in accordance with applicable South African legislation, including but not limited to the following:

Category of records	Applicable legislation
Company and statutory records	Companies Act 71 of 2008
PAIA Manual and access-to-information records	Promotion of Access to Information Act 2 of 2000
Personal information and privacy records	Protection of Personal Information Act 4 of 2013
Accounting, tax and VAT records	Income Tax Act 58 of 1962; Value-Added Tax Act 89 of 1991; Tax Administration Act 28 of 2011
Employment and labour records	Labour Relations Act 66 of 1995; Basic Conditions of Employment Act 75 of 1997; Employment Equity Act 55 of 1998
UIF, skills and compensation records	Unemployment Insurance Act 63 of 2001; Unemployment Insurance Contributions Act 4 of 2002; Skills Development Act 97 of 1998; Skills Development Levies Act 9 of 1999; Compensation for Occupational Injuries and Diseases Act 130 of 1993
Health and safety records	Occupational Health and Safety Act 85 of 1993
Electronic communications and online transaction records	Electronic Communications and Transactions Act 25 of 2002
Consumer-related records	Consumer Protection Act 68 of 2008
B-BBEE-related records, where applicable	Broad-Based Black Economic Empowerment Act 53 of 2003
Guest registration records, where applicable	Immigration Act 13 of 2002 and applicable regulations
Liquor licence records, where applicable	Western Cape Liquor Act 4 of 2008
Municipal permits and licences, where applicable	Applicable municipal by-laws and regulations

7. Subjects and Categories of Records Held by the Company

Subject	Categories of records
Company and governance records	Incorporation documents, company registers, resolutions, director and shareholder records, statutory records
Financial and tax records	Annual financial statements, accounting records, bank records, invoices, debtor and creditor records, VAT and tax records, asset records
Human resources and employment records	Employee files, contracts, payroll records, leave records, disciplinary records, training records, UIF and statutory employment records
Guest, customer and reservation records	Booking records, guest registration records, guest correspondence, invoices, payment records, guest preferences and complaints
Restaurant, bar and event records	Restaurant bookings, event/function records, menu records, guest and customer correspondence
Supplier and procurement records	Supplier details, quotations, purchase orders, invoices, contracts, payment and delivery records
Operational records	Policies and procedures, maintenance records, service records, stock records, incident records and operational correspondence
Property, security and health and safety records	Building, maintenance, security, CCTV, access control, insurance and health and safety records
IT and communications records	Email records, website records, system access records, cloud service and IT support records
Legal and compliance records	Contracts, legal correspondence, insurance claims, regulatory records, POPIA and PAIA compliance records
Marketing and public communication records	Website content, public promotions, social media records and marketing material

8. Processing of Personal Information

8.1 Purpose of Processing Personal Information

Montagu Country Hotel (Pty) Ltd processes personal information for the following purposes:

- to operate the hotel, restaurants, spa enquiries where applicable, and related hotel services;
- to manage accommodation bookings, guest check-in, guest services, billing and payments;
- to communicate with guests, customers, suppliers and service providers;
- to manage restaurant, bar, event and function enquiries and bookings;
- to provide customer service and respond to requests, complaints and feedback;
- to manage employees, payroll, statutory employment obligations and workplace administration;
- to manage suppliers, contractors and procurement;
- to comply with legal, tax, accounting, regulatory and reporting obligations;
- to protect the safety and security of guests, staff, property and the business;
- to manage marketing communications where lawful and appropriate; and
- to protect the legal rights and legitimate interests of the company.

8.2 Categories of Data Subjects and Personal Information Processed

Categories of data subjects	Personal information that may be processed
Guests, customers and prospective guests	Name, contact details, booking details, payment and transaction information, ID/passport numbers where required, ID/passport copies only in exceptional circumstances, vehicle registration where collected, guest preferences, correspondence, complaints, CCTV images and other information voluntarily provided. Payment card details are generally processed by payment service providers rather than stored by the company.
Restaurant, bar and event customers	Name, contact details, booking or event details, payment information, dietary or accessibility information voluntarily provided, correspondence and complaints
Website users and marketing contacts	Name, contact details, enquiry details, communication preferences, marketing preferences, records of consent or objections, website and device information, IP address, browser information, pages visited, cookies and similar online identifiers where applicable
Children included in bookings	Names, ages and booking-related information provided by a parent, guardian or other competent person, where required for a family booking, service or legal requirement.
Employees and job applicants	Name, contact details, identity number, address, employment history, qualifications, references, payroll and tax information, bank details, leave records, performance records, disciplinary records and statutory employment records
Suppliers, contractors and service providers	Name, contact details, company registration details, VAT number, banking details, contracts, invoices, delivery records and compliance information
Directors, shareholders and authorised representatives	Name, contact details, identity information, statutory records, governance records and company-related information
Visitors and other persons interacting with the premises	Name and contact details where provided, CCTV images, access or incident records where applicable

8.3 Recipients or Categories of Recipients to Whom Personal Information May Be Supplied

Category of personal information	Recipients or categories of recipients
Guest, customer and booking information	Booking platforms, online travel agencies, travel agents, tour operators, payment processors, banks, IT and cloud service providers, email and communications providers, auditors, insurers and professional advisers where required
Payment and financial information	Banks, payment processors and payment gateways, accounting, reporting and business-system providers, accountants, auditors, SARS and professional advisers
Employee information	Payroll providers, SARS, Department of Employment and Labour, UIF, Compensation Fund, medical aid or retirement fund administrators where applicable, auditors and professional advisers
Supplier and contractor information	Banks, accountants, auditors, professional advisers and regulatory bodies where required
Identity, qualification, reference or credit-related information	SAPS, SAQA, credit bureaux, reference-checking providers or other verification bodies, where applicable and lawful
Security and CCTV-related information	Security service providers, insurers, SAPS or other lawful authorities where required
Website, marketing and communication information	Website hosting providers, IT and security providers, email and communications providers, marketing, analytics and advertising service providers, review and guest-feedback platforms
Legal and compliance information	Attorneys, insurers, auditors, regulators, courts and other lawful authorities where required

8.4 Planned Transborder Flows of Personal Information

Montagu Country Hotel (Pty) Ltd may use cloud-based, online or third-party service providers for its booking system, email provider, accounting system, payroll, website hosting, payment processing, marketing, analytics and advertising platforms, reporting systems, review management system, POS system, IT support and business administration.

As a result, limited personal information may be stored or processed outside South Africa, depending on the systems and service providers used.

The categories of personal information that may be affected include guest, customer, supplier, employee, financial, booking, payment, communication, review, marketing and business administration information.

8.5 Information Security Measures

Montagu Country Hotel (Pty) Ltd applies reasonable security measures to protect personal information, including where appropriate:

- password-protected systems and restricted access;
- antivirus, malware and ransomware protection;
- secure backups and data storage;
- physical access controls and locked storage;
- CCTV and security monitoring;
- separation of guest and internal network access where applicable;
- confidentiality obligations for staff and service providers;
- secure disposal of records where appropriate;
- security response and panic-button arrangements at the premises; and
- other reasonable administrative, technical and physical safeguards.

9. Availability of the Manual

9.1 A copy of this Manual is available on the website of Montagu Country Hotel (Pty) Ltd, including through the footer of the website pages.

9.2 A copy of this Manual is available at the principal place of business of Montagu Country Hotel (Pty) Ltd for public inspection during normal business hours.

9.3 A copy of this Manual is available to any person upon request and upon payment of the prescribed fee, where applicable.

9.4 A copy of this Manual is available to the Information Regulator upon request.

9.5 A fee for a copy of the Manual may be payable for each A4-size photocopy made, as contemplated in the applicable PAIA Regulations.

10. Updating of the Manual

The Information Officer of Montagu Country Hotel (Pty) Ltd will update this Manual on a regular basis, or when material changes occur.

11. Issued by

Name: Colene Basson

Capacity: Information Officer

Signature: Colene Basson

Date: 19 August 2026