



**Inzalo Investment Holdings (Pty) Limited – Trading as  
“The Thornybush Collection” including Simbambili Game  
Lodge**

(Registration Number: 1992/002259/07)

MANUAL

Published in terms of section 51 of the

**Promotion of Access to Information Act 2 of 2000**

**Table of Contents**

1 Introduction.....3

1.1 Availability of this PAIA Manual .....3

1.2 Availability of guides to the PAIA and POPI Acts .....3

2 Company contact details.....4

3 Company records.....5

3.1 Company records availability .....5

3.2 Company record classification key.....6

4 Processing of personal information.....7

4.1 The purpose of processing of personal information by Thornybush.....7

4.2 Categories of data subjects and personal info processed by Thornybush .....8

4.3 Recipients or categories of recipients with whom personal info is shared .....9

4.4 Information security measures to protect personal information.....10

4.5 Trans-border flows of personal information .....10

4.6 Personal information received from third parties .....11

5 Prescribed request forms and fees.....11

5.1 Form of request.....11

5.2 Prescribed fees.....12

5.3 Access to prescribed forms and fees.....12

6 Remedies.....12

## 1 Introduction

Inzalo Investment Holdings (Pty) Limited (the “Company” or “Thornybush”), including Simbambili Game Lodge conducts business as a luxury safari operator, selling to customers both directly and via third-party agents.

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

The PAIA and POPI Acts give effect to everyone’s constitutional right of access to information held by private sector or public bodies, if the record or personal information is required for the exercise or protection of any rights. If a public body lodges a request, the public body must be acting in the public interest.

Requests shall be made in accordance with the prescribed procedures, at the rates provided. The forms and tariff are dealt with in section 5.

### 1.1 Availability of this PAIA Manual

This manual is published on the Company website at [www.thornybush.com](http://www.thornybush.com) or alternatively, a copy can be requested from the Information Officer at Thornybush (see contact details in section 2).

## 1.2 Availability of guides to the PAIA and POPI Acts

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

<b>PAIA Act</b>	<b>POPI Act</b>
South African Human Rights Commission Promotion of Access to Information Act Unit Research and Documentation Department Private Bag 2700 Houghton Johannesburg 2041	Information Regulator (details still to be published).
<b>PAIA Act</b>	<b>POPI Act</b>
29 Princess of Wales Terrace Corner York and St Andrews Street Parktown Johannesburg 2193	
Telephone number: (011) 484 8300 Fax number: (011) 484 7146/7 Website : <a href="http://www.sahrc.org.za">www.sahrc.org.za</a> E-mail : <a href="mailto:PAIA@sahrc.org.za">PAIA@sahrc.org.za</a>	

## 2 Company contact details

Company contact details in terms of PAIA section 51:

Inzalo Investment Holdings (Pty) Limited  
P.O. Box 169  
Hoedspruit  
1380

Thornybush Game Lodge  
Thornybush Nature Reserve  
Guernsey Road  
Hoedspruit  
Limpopo  
1380

Telephone number: 011 253 6500 (Switchboard)

Website : [www.thornybush.com](http://www.thornybush.com)

Duly authorised persons:

<b>Information Officer</b>
Michael Aldren E-mail: <a href="mailto:InfoOfficer@thornybush.com">InfoOfficer@thornybush.com</a>

### 3 Company records

#### 3.1 Company records availability

Departmental records	Subject	Classification no.
Health, Safety and Environmental Department	Health and Safety Records (inc Employees, Contractors)	1,2,5
Human Resources Department	Employee Records	1,2,5
	Employment Contracts	1,2
	Personnel Guidelines, Policies and Procedures	7
	Employee Medical Records	1,2,4
	Employee Pension and Provident Fund Records	1,2
	Payroll Records	1,2
	Recruitment Records	1,2
Financial Division	Audited Financial Statements	7
	Tax Records (Company & Employees)	1,7
	Asset Register	7
	Supplier Records	1,2,3
	Management Accounts	7
	Insurance Policies	1,2
Legal Services and Compliance Division	General Contract Documentation	3,7
	Company Guidelines, Policies and Procedures	7
	Employee, customer and supplier information	6
	Statutory Records	7
Sales and Marketing Division	Market Information	7
	Marketing and Future Campaign Strategies	7
	Customer Information and Database	1, 2, 7

**3.2 Company record classification key:**

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

## **4 Processing of personal information**

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

### **4.1 The purpose of processing of personal information by Thornybush**

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

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



#### 4.2 Categories of data subjects and personal information processed by Thornybush

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

Categories of Data Subjects	Personal Information processed
Customers and potential customers	Customer personal information
	Customer location information
Suppliers	Supplier personal information
	Personal information of supplier representatives
Employees	Employee personal information
	Employee medical information
	Employee disability information
	Employee Pension and Provident Fund Information
	Employee contracts
	Employee performance records
	Payroll records
	Electronic access records
	Physical access records
	Health and safety records
	Training records
	Employment history
	Time and attendance records
Job applicants	Curriculum vitae and application forms
	Criminal checks
	Background checks
Children	Childs medical information
	Child's information acquired for processing travel documents
Visitors	Physical access records

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

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

- our carefully selected business partners who provide products and services under one of our brands; and
- our service providers and agents who perform services on our behalf.

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

- we are obliged to provide such information for legal or regulatory purposes;
- we are required to do so for purposes of existing or future legal proceedings,
- we are selling one or more of our businesses to someone to whom we may transfer our rights under any customer agreement we have with you;
- we are involved in the prevention of fraud, loss, bribery or corruption;
- they perform services and process personal information on our behalf;
- this is required to provide or manage any information, products and/or services to data subjects; or
- needed to help us improve the quality of our products and services.

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

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

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

#### **4.4 Information security measures to protect personal information**

Reasonable technical and organisational measures have been implemented for the protection of personal information processed by Thornybush and its operators. In terms of the PoPI Act, operators are third parties that process personal information on behalf of Thornybush.

We continuously implement and monitor technical and organisational security measures to protect the personal information we hold, against unauthorised access, as well as accidental or wilful manipulation, loss or destruction.

We will take steps to ensure that operators that process personal information on behalf of BMW apply adequate safeguards as outlined above.

#### **4.5 Trans-border flows of personal information**

We will only transfer personal information across South African borders if the relevant business transactions or situation requires trans-border processing, and will do so only in accordance with South African legislative requirements; or if the data subject consents to transfer of their personal information to third parties in foreign countries.

We will take steps to ensure that operators are bound by laws, binding corporate rules or

binding agreements that provide an adequate level of protection and uphold principles for reasonable and lawful processing of personal information, in terms of the PoPI Act.

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

#### **4.6 Personal information received from third parties**

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

### **5 Prescribed request forms and fees**

#### **5.1 Form of request**

To facilitate the processing of your request, kindly:

- i. Use the prescribed form on the Company website.
- ii. Address your request to the Legal Services and Compliance Department.
- iii. Provide sufficient detail to enable the Company to identify:
  - a. The record(s) requested.
  - b. The requestor (and, if an agent is lodging the request, proof of capacity).
  - c. The South African postal address, email address or fax number of the requestor.
  - d. The form of access required.
  - e. The South African postal address, email address or fax number of the requestor.
  - f. If the requester wishes to be informed of the decision in any manner (in addition to written) the manner and particulars thereof.
  - g. The right which the requestor is seeking to exercise or protect with an explanation of the reason the record is required to exercise or protect the right.

## 5.2 Prescribed fees

The following applies to requests:

- i. A requestor is required to pay the prescribed fees (R50.00) before a request will be processed.
- ii. If the preparation of the record requested requires more than the prescribed hours (six), a deposit shall be paid (of not more than one third of the access fee which would be payable if the request were granted).
- iii. A requestor may lodge an application with a court against the tender/payment of the request fee and/or deposit.
- iv. Records may be withheld until the fees have been paid.

## 5.3 Access to prescribed forms and fees

Prescribed forms and fees are published on the Company website or, alternatively, copies can be requested from the Information Officer (see contact details in section 2). Prescribed forms and fees can be found on the Company website as follows:

Forms: <https://www.thornybush.com/privacy-policy/>

## 6 Remedies

The company does not have internal appeal procedures regarding PAIA and POPI Act requests. As such, the decision made by the duly authorised persons in section 2, is final. If a request is denied, the requestor is entitled to apply to a court with appropriate jurisdiction, or the Information Regulator (once established), for relief.