



Association of SOUTHERN AFRICAN TRAVEL ADVISORS

STRONGER TOGETHER



HOW TO CREATE YOUR PAIA MANUAL

1. WHO IS THIS FOR?

This guide is intended for all ASATA members who qualify as private bodies under the Promotion of Access to Information Act 2 of 2000 (PAIA), as amended. Under PAIA, a private body includes any natural or juristic person that carries on a trade, business, or profession. This means that travel agencies, tour operators, travel management companies and other ASATA member businesses are legally required to compile and maintain a PAIA Manual.

2. WHY IS THIS USEFUL?

As a private body, you must compile and make available a PAIA Manual. The purpose of the PAIA Manual is to inform the public how they may request access to records held by your organisation.

This requirement arises under the Promotion of Access to Information Act, 2000 (PAIA), and supports your broader compliance obligations under the Protection of Personal Information Act 4 of 2013 (POPIA). While PAIA concerns access to information, POPIA regulates the processing of personal information. The PAIA Manual forms part of your overall data protection and transparency framework.

Having a properly completed PAIA Manual:

- Demonstrates legal compliance with PAIA;
- Promotes transparency and accountability;
- Assists clients, employees and third parties in understanding how to request information;
- Supports your POPIA compliance obligations; and
- Reduces regulatory risk in the event of an audit or complaint.

This short guide is designed to assist you in correctly completing the PAIA Manual using the Information Regulator's official template for private bodies.

Download the official template: [PAIA Manual Template for Private Bodies](#)

Once you have downloaded the official template, this guide will walk you through each section, explaining what information you need to insert and how to complete it correctly for your organisation.

3. LET'S COMPLETE THE TEMPLATE TOGETHER...

On the front page, fill in your:

- Name of the business (as registered);
- Add your logo (if applicable);
- Date of compilation (when you first completed your PAIA manual); and
- Date of revision (When it was last revised or amended).

Table of contents

This must be added lastly, as you will be moving sections around in the document. Wait until you are done with everything before you complete this section.

Section 1

Complete or remove acronyms and abbreviations from the list as they apply to your organisation.

Section 2

This wording can be used from the template with no changes required, as it serves the legislative purpose of creating and maintaining the PAIA manual.

Section 3

In heading 3, you must fill in your organisation's name.

This section requires you to insert the contact details of the person(s) responsible for handling:

- PAIA requests (access to information); and

- POPIA compliance (personal information matters).

You must not leave the template wording in place. You must replace it with actual details.

Section 3.1:

This section requires information from your organisation's Information Officer (IO).

For a private body, the Chief Information Officer is automatically the CEO, Owner, or Managing Director of the company.

You must insert:

- Full name of the CEO / Managing Director;
- Business telephone number (landline if available);
- Email address (official company email preferred);
- Fax number (if you still use one, if not, you may state "N/A")

If the agency is small and owner-managed, the owner's details must be inserted here. Remember to register your Information Officer and Deputy Information Officers on the Information Regulator's portal.

Section 3.2:

This requires information from your organisation's Deputy Information Officer (DIO). This section should only be completed **if** you have formally designated a Deputy Information Officer in terms of section 17(1) of PAIA.

If you have appointed someone (for example, an Operations Manager, Compliance Officer, or Senior Admin Manager), you must insert:

- Full name
- Work telephone number
- Email address
- Fax number (or N/A)

If you have not formally appointed a Deputy Information Officer, you may state:

"No Deputy Information Officer has been designated." Or do not add a Deputy Information Officer's block in your manual.

Sections 3.3 and 3.4:

These can be combined. This section requires you to provide the main contact details of your business. This must reflect your officially registered or principal place of business, not a branch office (unless it is your only office).

Section 4

Sections 4.1-4.5:

This wording can be used as-is in the template.

Section 4.6:

This requires you to state which two of the official languages you will make the Guide available in (electronically and at your office). Copies of these guides can be obtained on the Information Regulator's website under the 'PAIA' main heading and then the 'PAIA guides' tab.

Promotion of Access to Information Act

PAIA Guides	PAIA Manual Templates	Procedures	PAIA Guides	Forms	Information Regulator PAIA Manuals	FAQs
-------------	-----------------------	------------	-------------	-------	------------------------------------	------

PAIA Guides in other Languages
Afrikaans – isiNdebele – isiXhosa – isiZulu – Siswati – Sepedi – Sesotho – Setswana – Tshivenda – Xitsonga

Section 5

Category of records	Types of the Record	Available on Website	Available upon request
		X	X

Insert your agency's name in the heading and list the category of records and types of documents that are available on your website and upon request.



Let's get practical.

You should have the category or record "Compliance," and the record type should be "PAIA Manual and guidelines." Then mark it with an "X" to indicate that it is both available on the website and upon request. Start by reviewing your website to see which documents you can download or view, and go from there.

Section 6

Category of Records	Applicable Legislation
Memorandum of incorporation	Companies Act 71 of 2008
PAIA Manual	Promotion of Access to Information Act 2 of 2000

Insert your agency's name in the heading and complete the table by specifying what documents or records you have that are created in accordance with a specific legislation in South Africa.



Let's get practical.

You are legally required to create a PAIA manual, and the law applicable is the Promotion of Access to Information Act 2 of 2000. Any other documentation you created because the law required it must also be listed, as these two mentioned in the table above are only two examples. Think about your Privacy Notice, which is required in terms of POPIA. Consider compliance, health and safety, employment, and regulatory documentation, such as BBBEE certification. For example, add the PAIA manual on the left (the document you require in terms of certain legislation) and then add the applicable legislation in the right column of the table.

Section 7

Subjects on which the body holds records	Categories of records
Strategic Documents, Plans, Proposals	Annual Reports, Strategic Plan, Annual Performance Plan.
Human Resources	- HR policies and procedures - Advertised posts - Employees records

Insert your agency's name in the heading and add the subject list on the left of the table. This could be any of your departments, such as HR, Legal, Compliance, Finance, IT, Procurement, Sales, etc. On the right side of the table, you must add the categories of records that contain personal information of data subjects within those departments.



Let's get practical.

Your Human Resources (HR) department may hold employment records, sick leave records, leave records, etc., so you can add Human Resources to the left and the records to the right column in the table that contains personal information

Section 8

This section deals with the purpose for which you are processing personal information in your organisation, and the specific data subjects you are processing.

Section 8.1:

You must list the purposes for which you are processing personal information in your organisation. Describe the purpose and the reason for processing.



Let's get practical.

You are processing personal information to book flights, and the purpose of the processing is to fulfil the contractual obligation between you and your customer who contracted with you for these services. Add a list of these processing reasons and the legal justification (section 11(1) of POPIA) as the purpose for the processing.

Section 8.2:

Categories of Data Subjects	Personal Information that may be processed
Customers / Clients	name, address, registration numbers or identity numbers, employment status and bank details
Service Providers	names, registration number, vat numbers, address, trade secrets and bank details
Employees	address, qualifications, gender and race

This section requires you to clearly set out who you collect personal information from (the categories of data subjects) and what types of personal information you collect about each group.

You must list every group of people whose personal information you process in your business. For a travel agency, this typically includes:

- Customers/travellers;
- Corporate clients (if you do business travel);
- Service providers (airlines, hotels, tour operators, etc.);
- Employees;
- Job applicants; or
- Website users or online enquirers.

For each category, describe the personal information you actually collect in the course of providing travel services. Do not copy generic examples. Think practically. Ask yourself:

- What information do we collect to book a flight?
- What do we need for a visa?
- What do we collect for travel insurance?
- What do we collect for payroll?
- What do we collect from suppliers?

Section 8.3:

Category of personal information	Recipients or Categories of Recipients to whom the personal information may be supplied
Identity number and names, for criminal checks	South African Police Services
Qualifications, for qualification verifications	South African Qualifications Authority
Credit and payment history, for credit information	Credit Bureaus

This section requires you to explain:

What types of personal information you share, and who you share it with. You are not listing internal departments. This is external sharing of personal information. You are listing external parties to whom you disclose personal information in the course of doing business.

This table is completed by adding the personal information shared with the organisation/institution to the left column, and the corresponding information to the right column.



Let's get practical.

If you conduct criminal checks, you will share identity numbers or names with SAPS. Add the information to the left column, and the Organisation SAPS in the right column of the table.

For you to identify where you send personal information to, ask yourself:

- When we book a flight, who do we send passport details to?
- When we book a hotel, who receives the traveller's information?
- When we process a payment, who receives banking or card information?
- When we assist with visas, who receives documentation?
- When we run payroll, who receives employee information?
- When we use IT systems, does the service provider access data?

Every external party that receives personal information must be listed, but it is important to remember that the template says 'recipients or categories of recipients'. This means you do not have to specify the exact organisation's name. You can also say the recipient's category, for example, an internet service provider, instead of MWeb.

Section 8.4:

State whether personal information leaves South Africa and goes to another country, either because:

- You send it there; or
- It is stored there (for example, in cloud systems).

If personal information leaves the Republic of South Africa, even electronically, you must disclose it. A transborder flow happens when personal information is either:

- sent to an airline based overseas;
- stored on cloud servers outside South Africa;

- sent to a hotel outside South Africa;
- sent to an embassy or foreign visa authority; or
- processed through an international booking platform.

When you need to determine whether the information goes outside South Africa, ask yourself:

- When we book an international flight, where is the airline based?
- When we book hotels overseas, where is that information stored?
- When we assist with visas, which country receives the documents?
- Where are our cloud systems hosted?
- Where are our email servers hosted?
- Is our accounting software cloud-based and hosted overseas?

If any of these are yes, then you have transborder flow of information and need to disclose it in this section.

Section 8.5:

Briefly describe the security measures you have in place to protect personal information. You must explain how you ensure:

- Confidentiality (only authorised people can access the information);
- Integrity (information is not altered or tampered with); and
- Availability (information is accessible when needed).

You do not need to provide technical details, just a clear overview of the safeguards you use.



Let's get practical.

Examples for travel agencies could include password-protected systems, role-based access controls (staff only access what they need), data encryption (email, cloud storage, payment systems), secure booking platforms, antivirus and anti-malware software, two-factor authentication, regular system updates, secure disposal of paper records or locked filing cabinets for physical files.

Section 9

In this section, you must mention that your manual is available:

- At your business premises (for public viewing and inspection);
- On your website, if you have one; and
- Electronically on request.

This is part of making your business transparent and accessible.

Section 9.1.1:

You must add a link to your website.

Section 9.1.2:

Insert your agency's name.

Sections 9.1.3 – 9.2:

The wording in these sections can be used as-is from the template.

Section 10

Insert the name of your agency and, below the signature line, complete the name of your Information Officer and their title in the agency.

4. IMPORTANT REMINDERS

Update your PAIA Manual regularly, at least once a year or when your business structure or processes change. Remember that the Information Regulator does inspections and can ask to view the documents at your office at any time.

Register and submit your Information Officer and, if applicable, Deputy Information Officer's details to the Information Regulator by registering on the [portal](#).

5. RESOURCES

[PAIA Manual Template for private bodies](#)

[PAIA Manual Template for public bodies](#)

[Guide on How to Use the PAIA Act 2 of 2000, as amended](#) (in English)

[Information Regulator Website:](#)

Forms: [Information Regulator's portal](#)

- Form 01: [Request for a Guide from the Regulator](#) [Regulation 2]
- Form 01: [Request for a Copy of the Guide from an Information Officer](#) [Regulations 3]
- Form 02: [Request for Access to Record](#) [Regulation 7]
- Form 03: [Outcome of request and of fees payable](#) [Regulation 8]
- Form 04: [Internal Appeal Form](#) [Regulation 9]
- Form 05: [Complaint Form](#) [Regulation 10]
- Form 13: [PAIA Request for Compliance Assessment Form](#) [Regulation 14(1)]



Association of SOUTHERN AFRICAN TRAVEL ADVISORS

STRONGER TOGETHER

GENERAL@ASATA.CO.ZA