

THE HAWTHORN BOUTIQUE HOTEL

23 Morning Glory Lane, Heatherlands, George, Western Cape

PAIA MANUAL

*Prepared in terms of Section 51 of the Promotion of Access to Information Act 2 of 2000 (as amended)
Incorporating the record of processing required under Section 17 of the Protection of Personal Information Act 4 of
2013 (POPIA)*

Date of compilation: [1 September 2026]

Date of last revision: [1 September 2026]

1. List of Acronyms and Abbreviations

PAIA	Promotion of Access to Information Act 2 of 2000
POPIA	Protection of Personal Information Act 4 of 2013
IO	Information Officer
DIO	Deputy Information Officer
The Regulator	The Information Regulator of South Africa
The Hotel / Hawthorn	The Hawthorn Boutique Hotel

2. Purpose of this Manual

This Manual is published in terms of Section 51 of the Promotion of Access to Information Act 2 of 2000 ("PAIA") and incorporates the information required under Section 17 of the Protection of Personal Information Act 4 of 2013 ("POPIA").

Its purpose is to:

- Inform members of the public how to request access to records held by The Hawthorn Boutique Hotel;
- Describe the categories of records held by the Hotel;
- Set out how the Hotel processes personal information, in compliance with POPIA; and
- Provide the contact details of the Hotel's Information Officer and Deputy Information Officer(s).

This Manual applies to guests, prospective guests, employees, suppliers, contractors, event clients, and any other party whose personal information the Hotel may collect, use, or store.

3. Key Contact Details

3.1 The Body

Name	The Hawthorn Boutique Hotel
Registered entity name	Aviostar Pty Ltd
Registration number	2016/331846/07
Physical address	23 Morning Glory Lane, Heatherlands, George, 6529, Western Cape
Postal address	Same as above
Telephone	+27 44 023 0070
Email	admin@hawthorn.co.za
Website	www.hawthorn.co.za

3.2 Information Officer

In terms of Section 1 of PAIA and Section 1 of POPIA, the head of a private body is, by default, its Information Officer. For The Hawthorn Boutique Hotel, this is:

Name	Andries Petrus Jacobus Troskie
Designation	Owner
Telephone	+27 82 441 7881
Email	gm@hawthorn.co.za
Registered with Information Regulator	Yes – 2026-065671

3.3 Deputy Information Officer (if applicable)

Not applicable — the Information Officer handles all requests directly.

4. Guide on How to Use PAIA and How to Obtain Access to the Regulator's Guide

The South African Human Rights Commission previously published, and the Information Regulator now publishes, a Guide on how to use PAIA. This Guide is available from:

- The Information Regulator's website: www.inforegulator.org.za
- Telephone: 012 406 4818
- Email: inforeg@justice.gov.za

Any person wishing to request access to a record held by the Hotel may do so by submitting the prescribed Form 2 (request for access to record of a private body) to the Information Officer, using the contact details in Section 3.2 above. There is no charge for lodging the request itself; a request fee and, where applicable, access/reproduction fees may be payable, in accordance with the prescribed PAIA fee schedule.

A request must provide sufficient detail to enable the record to be identified, and the requester must indicate the right the record is required to exercise or protect, if requested for that purpose. The Hotel will respond within the timeframes prescribed by PAIA (ordinarily within 30 days of receipt of a valid request, subject to any extension permitted by the Act).

5. Records Available Without Having to Request Access

The following categories of records are made freely available by the Hotel, without the need for a formal PAIA request:

- General marketing material, room rates, and package information published on the Hotel's website and brochures;
- This PAIA Manual;
- The Hotel's general terms and conditions of booking;
- Publicly available business information (e.g. CIPC registration details, VAT registration).

6. Records Available in Accordance With Other Legislation

Certain records held by the Hotel may also be accessible to specific parties under other legislation, without the need for a PAIA request, including:

- Payslips and UI-19 documentation to employees and the Department of Employment and Labour, under the Basic Conditions of Employment Act and UIF legislation;
- Tax invoices and VAT records to SARS, under the Tax Administration Act and VAT Act;
- Occupational health and safety records to inspectors, under the Occupational Health and Safety Act;
- CCMA-related records to the CCMA and parties to a dispute, under the Labour Relations Act.

7. Subjects and Categories of Records Held by the Hotel

The table below describes, by subject, the categories of records the Hotel holds. This is not an exhaustive list of every document, but a description of categories as required by Section 51(1)(e) of PAIA.

7.1 Guests and Event Clients

- Booking and reservation records (names, contact details, ID/passport numbers, payment details)
- Guest correspondence (email, WhatsApp, enquiry forms)
- Event and function contracts, quotes, and invoices
- CCTV footage of public areas of the property, for safety and security purposes
- Guest feedback, complaints, and incident reports

7.2 Employees

- Recruitment records (CVs, interview notes, reference checks)
- Employment contracts, appointment and disciplinary records
- Payroll, banking, tax, and UIF records
- Leave and medical certificate records
- Performance reviews and training records

7.3 Suppliers and Contractors

- Supplier agreements, quotes, and invoices
- Contractor and service-provider contact details and banking details for payment

7.4 Marketing and Business Development

- Newsletter and marketing mailing lists (subject to consent/opt-in)
- Social media engagement records and influencer/partnership agreements
- Photography and video content featuring guests, staff, or property (subject to consent)

7.5 Corporate and Financial Records

- CIPC registration and company records
- Financial statements, bank records, and tax returns
- Insurance policies and claims records
- Lease, title, or property-related agreements

8. Processing of Personal Information (Section 17, POPIA)

In terms of Section 17 of POPIA, the Hotel maintains this record of its processing activities as part of this Manual.

8.1 Purpose of Processing

The Hotel collects and processes personal information for the following purposes:

- Making and managing bookings, accommodation, and event reservations;
- Processing payments and complying with financial and tax record-keeping obligations;
- Communicating with guests before, during, and after their stay;
- Managing staff employment, payroll, and statutory HR compliance;
- Engaging suppliers, contractors, and business partners;
- Marketing the Hotel's offerings, where consent has been obtained;
- Maintaining the safety and security of guests, staff, and property (e.g. CCTV);
- Complying with legal obligations (e.g. SARS, Department of Labour, CCMA, POPIA/PAIA itself).

8.2 Categories of Data Subjects and Personal Information

Guests / event clients	Name, contact details, ID/passport number, payment/banking details, special requests (may include health info, e.g. allergies)
Employees	Name, ID number, banking details, tax number, next-of-kin, medical certificates, performance records
Suppliers/contractors	Business and contact details, banking details
Website/marketing contacts	Name, email address, marketing preferences

8.3 Recipients of Personal Information

Personal information may be shared with the following categories of recipients, only to the extent necessary:

- Payment processors and banks, to process payments;
- Accounting/payroll service providers;
- Booking platforms and channel managers (OTAs), where a booking is made through them;
- SARS, the Department of Employment and Labour, the CCMA, and other regulators, where legally required;
- IT service providers and PMS (property management system) providers, under confidentiality/processing agreements;
- Marketing or representation partners (e.g. sales representation agencies), where relevant to a specific engagement and covered by agreement.

The Hotel does not sell personal information to third parties.

8.4 Cross-Border Transfers

Not applicable.

8.5 Security Safeguards

The Hotel has implemented reasonable technical and organisational measures to secure personal information against loss, damage, unauthorised access, and unlawful processing, including:

- Access controls and password protection on booking/PMS systems;
- Restricting access to personal information to staff who require it to perform their duties;
- Secure storage of physical HR and guest records;
- CCTV access restrictions.

8.6 Data Subject Rights

Any data subject (guest, employee, supplier, or other individual) has the right, subject to POPIA, to:

- Request confirmation of whether the Hotel holds personal information about them;
- Request access to that personal information;
- Request correction or deletion of inaccurate, irrelevant, excessive, out of date, incomplete, or unlawfully obtained personal information;
- Object to the processing of their personal information in certain circumstances;
- Withdraw consent, where processing is based on consent (e.g. marketing communications);
- Lodge a complaint with the Information Regulator.

Requests relating to personal information should be directed to the Information Officer (Section 3.2).

9. Availability of this Manual

This Manual is available:

- On the Hotel's website: www.hawthorn.co.za
- At the Hotel's reception, on request, free of charge;
- By email, on request, from the Information Officer.

10. Updates to this Manual

This Manual will be reviewed periodically, and whenever there is a material change to the Hotel's processing activities, contact details, or applicable legislation. Version history is recorded below.

Version 1	1 September 2026 — Initial compilation
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— End of Manual —