

PAIA MANUAL

Zambezi Queen Collection

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

DATE OF COMPILATION: 18 August 2026
REVIEW FREQUENCY: Annually, or when material legal or operational changes occur

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1. ACRONYMS AND ABBREVIATIONS

Acronym	Meaning
DIO	Deputy Information Officer
GDPR	European Union General Data Protection Regulation
IO	Information Officer
PAIA	Promotion of Access to Information Act 2 of 2000, as amended
POPIA	Protection of Personal Information Act 4 of 2013
Regulator	Information Regulator (South Africa)
ZQC	Zambezi Queen Collection

2. PURPOSE OF THIS PAIA MANUAL

This Manual has been prepared to facilitate access to records held by Zambezi Queen Collection, operated in South Africa through Zambezi Queen (SA) (Pty) Ltd, in accordance with PAIA and to describe relevant personal-information processing in accordance with POPIA. It is intended to help members of the public understand what records ZQC holds, which records may be available without a formal request, and how a request for access can be made. This PAIA Manual is separate from,

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and complements rather than replaces, ZQC's Privacy Policy. The Privacy Policy explains how personal information is collected, used, disclosed and protected; this Manual explains access to records and the PAIA request process.

- check the categories of records held by ZQC that may be available without a formal PAIA request;
- understand the subjects on which ZQC holds records and the categories of records held on each subject;
- access the contact details through which assistance with access-to-information requests may be obtained;
- understand how to obtain the Information Regulator's Guide on how to use PAIA;
- understand the categories of personal information processed by ZQC, the purposes of processing, possible recipients, international transfers and general security safeguards; and
- understand the procedure for submitting a request and the circumstances in which access may lawfully be refused.

3. KEY CONTACT DETAILS FOR ACCESS TO INFORMATION

Item	Details
Private body / trading name	Zambezi Queen Collection
Legal entity name	Zambezi Queen (SA) (Pty) Ltd
Registration number	2003/012659/07
Information Officer / Head of private body	Sean Kritzinger - Chief Executive Officer / Information Officer
Access-to-information email	info@zqcollection.com
Telephone	+27 (0)21 715 2412
Physical address	Unit 1, 4 Silverwood Close, Steenberg Office Park, Tokai, Cape Town, 7945, South Africa
Postal address	Same as physical address
Website	www.zqcollection.com
VAT number	4510218946

For purposes of PAIA and POPIA, the Information Officer / Head of the private body is Sean Kritzinger, Chief Executive Officer of Zambezi Queen (SA) (Pty) Ltd. Access-to-information and privacy-related enquiries may be directed to info@zqcollection.com or +27 (0)21 715 2412.

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

The Information Regulator has made available a Guide on how to use PAIA. The Guide explains the objects of PAIA and POPIA, how to make requests for access to records, the assistance available from Information Officers and the Regulator, remedies available to requesters, and the applicable forms and fees.

The Guide and prescribed PAIA forms can be obtained from the Information Regulator's website at www.inforegulator.org.za, or a requester may contact ZQC's Information Officer using the contact details in section 3 for assistance.

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The Regulator makes the Guide available in South Africa's official languages. ZQC will provide reasonable assistance to a requester who requires help understanding or completing a request.

5. RECORDS AVAILABLE WITHOUT A FORMAL PAIA REQUEST

Certain information is routinely made available through ZQC's website, marketing channels or directly on enquiry. Availability remains subject to privacy, confidentiality, intellectual-property and other lawful restrictions.

Category of records	Examples	Website	On enquiry
Company and brand information	About ZQC, product descriptions, contact details, responsible tourism information	Yes	Yes
Guest and travel information	Property/vessel information, itineraries, FAQs, booking information and selected terms and conditions	Yes	Yes
Marketing information	Brochures, newsletters, promotions, media information and trade resources	Yes / selected	Yes
Privacy information	Privacy Policy and related privacy notices	Yes	Yes
PAIA information	This PAIA Manual once published	Yes	Yes
Employment opportunities	Vacancies where publicly advertised	Where applicable	Where applicable

6. RECORDS AVAILABLE IN ACCORDANCE WITH OTHER LEGISLATION

ZQC may create, maintain or retain records in accordance with legislation applicable to its South African activities and, where relevant, to its cross-border tourism operations. The exact legislation applicable to a particular record depends on the legal entity, activity, location and circumstances concerned. The following is an indicative, non-exhaustive list and should not be read as a representation that every listed record exists in every ZQC entity or jurisdiction.

Category of records	Applicable legislation / framework (as relevant)
PAIA Manual and access-to-information records	Promotion of Access to Information Act 2 of 2000, as amended
Personal information and privacy records	Protection of Personal Information Act 4 of 2013; GDPR where applicable
Company / corporate records	Companies Act 71 of 2008, where applicable to the relevant legal entity
Employment and payroll records	Basic Conditions of Employment Act 75 of 1997; Labour Relations Act 66 of 1995; Employment Equity Act 55 of 1998, where applicable
Tax and financial records	Income Tax Act 58 of 1962; Tax Administration Act 28 of 2011; Value-Added Tax Act 89 of 1991, where applicable
Health and safety records	Occupational Health and Safety Act 85 of 1993, where applicable
Electronic communications / transactions	Electronic Communications and Transactions Act 25 of 2002, where

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	applicable
Consumer records	Consumer Protection Act 68 of 2008, where applicable

7. SUBJECTS ON WHICH ZQC HOLDS RECORDS

Subject	Examples of categories of records
Corporate governance and management	Policies, governance records, strategy documents, management reports, contracts and business correspondence
Finance and accounting	Budgets, invoices, payments, banking records, tax records, financial statements and audit-related records
Human resources	Employee files, contracts, payroll records, leave records, training records, performance records, policies and disciplinary/grievance records
Sales and reservations	Enquiries, quotations, booking records, guest profiles, itineraries, agent/tour-operator records and reservation correspondence
Marketing and communications	Marketing databases, campaigns, website content, social media records, media and trade communications
Guests and customer service	Guest correspondence, preferences, feedback, complaints, incident records and service recovery records
Suppliers and service providers	Supplier details, contracts, invoices, due-diligence records and correspondence
Operations and safety	Operational procedures, maintenance records, risk assessments, incident reports, emergency plans, vessel/property records and health-and-safety records
Sustainability and community	Sustainability policies, community engagement records, conservation initiatives, cultural heritage/community visit records and Fair Trade Tourism evidence
Information technology and privacy	System access records, security records, privacy requests, data-breach records, backups and relevant IT service-provider records
Legal and compliance	Licences, permits, legal correspondence, regulatory submissions, insurance records and compliance records

8. PROCESSING OF PERSONAL INFORMATION

This section summarises the information required by the PAIA private-body template. For fuller detail on privacy practices, data-subject rights, cookies, marketing communications, retention and complaints, refer to ZQC's separate Privacy Policy.

8.1 Purpose of processing personal information

Consistent with ZQC's Privacy Policy, ZQC processes personal information for legitimate and lawful business purposes, including responding to enquiries; preparing quotations; confirming and administering reservations; providing accommodation, safari, transfer and activity services; communicating before, during and after travel; processing payments;

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complying with immigration, financial and legal obligations; improving services; managing customer relationships; administering competitions or promotions; sending marketing communications where permitted by law; recruiting and managing employees; managing suppliers and service providers; and protecting guests, employees and the business.

8.2 Categories of data subjects and personal information

Data subject	Personal information that may be processed
Guests / prospective guests	Name, contact details, nationality, passport/travel details where required, date of birth where necessary, emergency contacts, booking details, preferences, dietary/accessibility requirements, flight/transfer details, billing and transaction information
Travel agents / tour operators / trade partners	Names, business contact details, company details, booking correspondence, commercial arrangements and payment/account information
Employees / applicants	Identification and contact details, employment history, qualifications, payroll/banking details, performance and training records, leave records, emergency contacts and other employment-related information
Suppliers / contractors / service providers	Names, business contact details, company/registration details, tax/VAT information where applicable, banking/payment information, contracts and correspondence
Website users / marketing contacts	IP address, device/browser information, cookies, analytics data, email address, preferences and engagement information
Community and other stakeholders	Names, contact details, consultation records, correspondence, agreements and payment information where relevant

8.3 Recipients or categories of recipients

Personal information may be supplied, where necessary and lawful, to reservation and property-management system providers; payment service providers; transport providers; travel agents and tour operators; marketing and communications service providers; IT and cloud service providers; professional advisers; insurers; auditors; regulatory authorities; immigration or border authorities where required for travel; and law-enforcement agencies where legally required. ZQC does not sell personal information.

8.4 Planned transborder flows of personal information

As stated in ZQC's Privacy Policy, personal information may be transferred outside South Africa where necessary to provide services. Where personal information is transferred internationally, ZQC takes reasonable steps to ensure that appropriate safeguards are in place and that personal information receives an equivalent level of protection.

8.5 General information-security measures

ZQC takes reasonable technical and organisational measures to protect personal information against unauthorised access, loss, misuse, alteration, disclosure or destruction. Measures described in the Privacy Policy include secure servers, password protection, restricted staff access, staff confidentiality obligations, secure third-party service providers and regular system monitoring.

9. HOW TO REQUEST ACCESS TO A RECORD

A requester seeking access to a record of ZQC should submit the prescribed Form 2 (Request for Access to Record) to the Information Officer / Head of the private body using the contact details in section 3. The current prescribed form is available from the Information Regulator.

- provide sufficient particulars to identify the requester and the record requested;
- indicate the form in which access is required and relevant contact details;
- identify the right that the requester seeks to exercise or protect and explain why the requested record is required for that purpose, where PAIA requires this;
- provide proof of capacity or authority where the request is made on behalf of another person; and
- pay any prescribed request or access fee where applicable and not exempted.

ZQC will process a valid request within the timeframes prescribed by PAIA, subject to any lawful extension. If a request does not contain sufficient information, ZQC may contact the requester for clarification or assistance.

10. GROUNDS ON WHICH ACCESS MAY BE REFUSED

Access to a record is not automatic. ZQC may be required or permitted to refuse access where PAIA provides a lawful ground for refusal. Depending on the circumstances, these grounds may include the protection of another person's privacy; confidential commercial information; confidential information supplied by a third party; safety of individuals or property; legally privileged records; ZQC's own commercial information; research information; or other grounds recognised by PAIA.

Where only part of a record is protected and the remainder can reasonably be separated, ZQC will consider providing access to the portion that may lawfully be disclosed. A requester who is dissatisfied with the outcome may use the remedies available under PAIA, including a complaint to the Information Regulator or an application to court, as applicable.

11. FEES

PAIA permits prescribed fees to be charged for certain requests to private bodies, subject to applicable exemptions. The Information Regulator publishes the current fee structure. As at the date of compilation of this Manual, the prescribed request fee for a private body is R140.00, with additional prescribed reproduction, search/preparation and related fees potentially payable depending on the request.

Because the prescribed fee schedule may be amended, requesters should consult the Information Regulator's current PAIA fee structure before submitting a request. ZQC will advise a requester of any fee or deposit lawfully payable before processing or providing access where required.

12. AVAILABILITY OF THIS MANUAL

Once approved and published, a copy of this Manual will be available:

- on ZQC's website at www.zqcollection.com (the direct PAIA Manual URL should be inserted in the Fair Trade Tourism portal once the website page/file is live);
- at ZQC's Cape Town head office for public inspection during normal business hours, subject to reasonable operational and security arrangements;
- from the Information Officer on request, subject to any prescribed reproduction fee where applicable; and
- to the Information Regulator as required.

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The PAIA Manual should be published as a separate document or webpage from the Privacy Policy. Both may be linked from the website footer or legal/privacy area. The final PAIA Manual should have a stable direct URL so that it can be supplied as evidence for Fair Trade Tourism B1.8.

13. UPDATING OF THIS MANUAL

The Information Officer / Head of the private body will review this Manual at least annually and whenever material changes in legislation, ZQC's operations, record categories, contact details or personal-information processing require an update. The latest approved version will replace earlier versions on the ZQC website.

14. APPROVAL AND ISSUE

Approval item	Details
Issued by	Sean Kritzinger
Title	Chief Executive Officer / Information Officer
Signature	_____
Date	_____
Next review	August 2027, or earlier if required