



ROCKJUMPER

Worldwide Birding Adventures

PAIA AND POPIA MANUAL

Prepared in terms of Section 51 of the Promotion of Access to Information Act, No. 2 of 2000, as amended

For: Rockjumper Birding Tours CC
Entity type: Close Corporation / Private Body
Country: South Africa
Manual version: 1.0
Date approved: 26/06/2026
Review date: 26/06/2027

1. INTRODUCTION

This Manual has been prepared for **Rockjumper Birding Tours CC** in accordance with the Promotion of Access to Information Act, No. 2 of 2000, as amended (“PAIA”), and the Protection of Personal Information Act, No. 4 of 2013 (“POPIA”).

Rockjumper Birding Tours CC is a South African close corporation that arranges and operates birding and wildlife tours **within South Africa**. Although the Company’s tours are arranged and operated in South Africa, its guests and clients may come from South Africa or from other countries around the world.

The purpose of this Manual is to help members of the public, clients, employees, service providers, regulators and other interested parties understand:

- the categories of records held by Rockjumper Birding Tours CC;
- how to request access to records;
- who the Head of the Body and Information Officer are;
- how personal information is processed by the Company;
- to whom personal information may be disclosed;
- whether personal information may flow across South African borders;
- what safeguards are in place to protect personal information; and
- how to contact the Information Regulator.

2. DEFINITIONS AND ABBREVIATIONS

In this Manual:

“**Company**” means Rockjumper Birding Tours CC.

“**Data Subject**” means the person to whom personal information relates.

“**Head of the Body**” means the head of the private body for purposes of PAIA.

“**Information Officer**” means the person responsible for ensuring compliance with PAIA and POPIA.

“**PAIA**” means the Promotion of Access to Information Act, No. 2 of 2000, as amended.

“**POPIA**” means the Protection of Personal Information Act, No. 4 of 2013.

“**Personal Information**” means personal information as defined in POPIA.

“**Private Body**” means a private body as defined in PAIA.

“**Regulator**” means the Information Regulator of South Africa.

“**Requester**” means any person or party requesting access to a record.

“**Record**” means any recorded information, regardless of form or medium, in the possession or under the control of the Company.

3. COMPANY DETAILS

Registered name: Rockjumper Birding Tours CC

Registration number: 2001 / 059480 / 23

Trading name: Rockjumper Birding Tours

Nature of business: Specialist birding and wildlife tour operator arranging and operating tours within South Africa

Physical / street address:

ROCKJUMPER HOUSE
1 CROWE STREET
GARLINGTON ESTATE
HILTON
KWA-ZULU NATAL
3245
SOUTH AFRICA

Postal address:

PRIVATE BAG X6009
HILTON
KWA-ZULU NATAL
3245
SOUTH AFRICA

Telephone number: 072 704 4177

Fax number: +27 86 552 0553

Email address: info@rockjumper.com

Website: <https://www.rockjumperbirding.com>

4. HEAD OF THE BODY, INFORMATION OFFICER AND DEPUTY INFORMATION OFFICER DETAILS

For purposes of PAIA and POPIA, the Head of the Body and/or Information Officer is responsible for ensuring that Rockjumper Birding Tours CC complies with PAIA and POPIA.

4.1 Head of the Body

Name: Adam Riley

Position / capacity: Member / Director

Entity: Rockjumper Birding Tours CC

Street address:

ROCKJUMPER HOUSE
1 CROWE STREET
GARLINGTON ESTATE
HILTON
KWA-ZULU NATAL
3245
SOUTH AFRICA

Postal address:

PRIVATE BAG X6009
HILTON
KWA-ZULU NATAL
3245
SOUTH AFRICA

Telephone number: +27 33 394 0225 / +27 33 394 0251

Fax number: +27 86 552 0553

Email address: info@rockjumper.com

4.2 Information Officer

Information Officer: Clayton Burne

Position: Operations Manager

Entity: Rockjumper Birding Tours CC

Street address:

PRIVATE BAG X6009
HILTON
KWA-ZULU NATAL

3245
SOUTH AFRICA

Postal address:

PRIVATE BAG X6009
HILTON
KWA-ZULU NATAL
3245
SOUTH AFRICA

Telephone number: 066 2422 755

Fax number: Not applicable / +27 86 552 0553

Email address: clayton@rockjumper.com

4.3 Deputy Information Officer

No Deputy Information Officer has been appointed at this stage.

If a Deputy Information Officer is appointed in future, this Manual will be updated to include their name, position, street address, postal address, telephone number, fax number, where applicable, and email address.

5. PURPOSE OF THIS PAIA MANUAL

This Manual is intended to:

1. provide a description of the records held by Rockjumper Birding Tours CC;
2. explain the process for requesting access to records;
3. set out the contact details of the Head of the Body and Information Officer;
4. describe the PAIA Guide issued by the Information Regulator and how to access it;
5. list categories of records that may be available without a formal PAIA request;
6. describe records available in accordance with other legislation;
7. describe the subjects on which the Company holds records and the categories of records held for each subject;
8. explain the categories of personal information processed by the Company;
9. describe the purpose or reasons for processing personal information;
10. describe the categories of data subjects and the nature of personal information processed;
11. describe the persons or categories of persons to whom personal information may be disclosed;
12. explain whether the Company has planned transborder flows of personal information;
13. describe the technology and security measures used to protect personal information; and
14. explain where this Manual is available.

6. GUIDE ON HOW TO USE PAIA

The Information Regulator has developed and made available a guide on how to use PAIA. The guide is intended to assist any person who wishes to exercise their rights under PAIA and POPIA.

The PAIA Guide explains, among other things:

- the purpose of PAIA;
- how to request access to records held by public and private bodies;
- the assistance available from Information Officers;
- remedies available if access to records is refused;
- how to lodge complaints with the Information Regulator;
- rights of data subjects under POPIA.

The PAIA Guide is available from the Information Regulator and may be accessed through the Information Regulator's website.

Information Regulator contact details

Postal address:

JD House
27 Stiemens Street
Braamfontein
Johannesburg
2001
South Africa

General enquiries email: inforeg@justice.gov.za

PAIA complaints email: PAIAComplaints@inforegulator.org.za

POPIA complaints email: POPIAComplaints@inforegulator.org.za

Website: <https://www.inforegulator.org.za>

7. NOTICE REGARDING CATEGORIES OF RECORDS AUTOMATICALLY AVAILABLE WITHOUT A FORMAL PAIA REQUEST

Certain categories of records held by Rockjumper Birding Tours CC are automatically or voluntarily available without a person having to submit a formal request for access in terms of PAIA.

These records may include:

- company website content;
- South African tour information published on the Rockjumper website;
- general brochures and marketing material;
- publicly available terms and conditions;
- published privacy notices;
- general company contact details;
- publicly available travel information relating to South African tours;
- publicly available company information;
- newsletters, where publicly distributed;
- client forms or standard information documents made available by the Company;

- general marketing material;
- information that the Company has already made publicly available.

These records may be accessed:

- through the Company's website;
- by contacting the Company directly;
- by requesting a copy from the Information Officer, where applicable.

Access to these records does not require a formal PAIA request. However, the Company may still apply reasonable internal checks before releasing documents to ensure that confidential, personal or commercially sensitive information is not disclosed.

The Company may update this notice from time to time if further categories of records become automatically available.

8. SUBJECTS AND CATEGORIES OF RECORDS HELD BY THE COMPANY

Rockjumper Birding Tours CC holds records on the subjects listed below. The categories of records held under each subject may include, but are not limited to, the following:

8.1 Company secretarial and statutory records

Records relating to the legal registration, governance and statutory administration of Rockjumper Birding Tours CC.

Categories of records may include:

- registration documents;
- CIPC records;
- member records;
- resolutions;
- statutory returns;
- tax registration documents;
- PAIA and POPIA compliance records;
- Information Officer registration records;
- correspondence with regulators or public authorities.

8.2 Financial and accounting records

Records relating to the financial management, accounting, tax and audit affairs of the Company.

Categories of records may include:

- annual financial statements;
- management accounts;

- bank records;
- invoices;
- supplier statements;
- client payment records;
- tax records;
- VAT records, if applicable;
- payroll records, if applicable;
- audit and review files;
- insurance records;
- payment and refund records.

8.3 Client and traveller records

Records relating to clients and travellers participating in South African tours arranged or operated by Rockjumper Birding Tours CC. Guests may be South African residents or international travellers visiting South Africa.

Categories of records may include:

- client names and contact details;
- country of residence;
- booking information;
- South African tour participation records;
- emergency contact details;
- passport information, where required for identification, accommodation, travel logistics or emergency purposes;
- travel preferences;
- dietary requirements;
- medical or mobility information where voluntarily provided and required for tour safety or logistics;
- insurance-related travel information where applicable;
- correspondence with clients;
- payment and invoice history;
- incident or emergency records, where applicable.

8.4 Tour and operational records

Records relating to the planning, arrangement and operation of birding and wildlife tours within South Africa.

Categories of records may include:

- South African tour itineraries;
- tour costings;
- supplier confirmations;
- accommodation records;
- transport records;
- guide and tour leader records;
- incident reports;

- emergency response records;
- pre-departure information;
- supplier contracts;
- local operator correspondence;
- risk assessments where applicable.

8.5 Supplier and partner records

Records relating to suppliers, service providers, agents, partners and local operators used in connection with South African tours.

Categories of records may include:

- supplier contact details;
- service agreements;
- invoices and payment details;
- insurance confirmations;
- operational correspondence;
- due diligence documentation;
- accommodation, guiding, transport and logistics records for South African tours;
- supplier banking details;
- supplier tax or compliance information, where applicable.

8.6 Employee and contractor records

Records relating to employees, contractors, tour leaders, guides and other persons engaged by the Company.

Categories of records may include:

- employment contracts;
- contractor agreements;
- personnel files;
- payroll records;
- leave records;
- disciplinary records;
- performance records;
- training records;
- correspondence;
- identity and tax information;
- emergency contact details;
- banking details;
- statutory employment records.

8.7 Marketing and communications records

Records relating to marketing, client communications, website enquiries and promotional activities.

Categories of records may include:

- client mailing lists;
- newsletter subscription records;
- marketing preferences;
- website enquiry records;
- social media communications;
- promotional material;
- survey responses;
- client feedback and testimonials;
- advertising and campaign records;
- consent records, where applicable.

8.8 Information technology and security records

Records relating to the Company's information technology systems, website, communications, access controls and information security.

Categories of records may include:

- user access records;
- system administration records;
- IT policies;
- cybersecurity records;
- incident logs;
- backup records;
- website and system records;
- email and communication records;
- data processing and hosting records;
- system audit logs, where applicable;
- records relating to passwords, access permissions and security controls.

8.9 Legal, compliance and insurance records

Records relating to legal matters, regulatory compliance, insurance and risk management.

Categories of records may include:

- contracts;
- legal correspondence;
- claims records;
- insurance policies;
- risk management records;
- regulatory correspondence;
- POPIA records;
- PAIA requests and responses;
- complaints records;
- data subject request records;

- breach or incident records, where applicable.

9. RECORDS AVAILABLE IN ACCORDANCE WITH OTHER LEGISLATION

Where applicable, Rockjumper Birding Tours CC may hold records in accordance with South African legislation. These records may be made available in accordance with the relevant legislation, subject to any lawful grounds for refusal under PAIA, POPIA or other applicable laws.

9.1 Close Corporations Act, No. 69 of 1984

Records may include:

- founding statement and amended founding statements;
- CIPC records;
- member details;
- accounting officer records, where applicable;
- statutory records and filings.

9.2 Companies Act, No. 71 of 2008, where applicable

Records may include:

- company or entity records;
- governance records;
- resolutions;
- statutory registers, where applicable;
- CIPC correspondence and filings.

9.3 Income Tax Act, No. 58 of 1962

Records may include:

- income tax returns;
- tax assessments;
- correspondence with SARS;
- supporting tax schedules;
- financial records used for tax submissions.

9.4 Tax Administration Act, No. 28 of 2011

Records may include:

- tax registration records;
- SARS correspondence;
- tax compliance status records;
- notices and assessments;

- supporting documents for tax submissions.

9.5 Value-Added Tax Act, No. 89 of 1991, where applicable

Records may include:

- VAT registration records;
- VAT returns;
- tax invoices;
- debit and credit notes;
- VAT reconciliations;
- supporting documents for VAT submissions.

9.6 Basic Conditions of Employment Act, No. 75 of 1997

Records may include:

- employee particulars;
- employment contracts;
- working hours records;
- leave records;
- remuneration records;
- termination records.

9.7 Labour Relations Act, No. 66 of 1995

Records may include:

- disciplinary records;
- grievance records;
- employment policies;
- employment-related correspondence;
- records relating to labour disputes, where applicable.

9.8 Employment Equity Act, No. 55 of 1998, where applicable

Records may include:

- employment equity records;
- workforce profile information;
- employment equity reports, where applicable;
- records relating to employment equity compliance.

9.9 Unemployment Insurance Act, No. 63 of 2001

Records may include:

- UIF registration records;

- employee UIF contribution records;
- UIF declarations;
- correspondence with the Department of Employment and Labour.

9.10 Compensation for Occupational Injuries and Diseases Act, No. 130 of 1993, where applicable

Records may include:

- COIDA registration records;
- return of earnings submissions;
- workplace injury records;
- claims records;
- correspondence with the Compensation Commissioner.

9.11 Electronic Communications and Transactions Act, No. 25 of 2002

Records may include:

- electronic communications;
- website terms and conditions;
- electronic transaction records;
- email correspondence;
- records relating to electronic records and communications.

9.12 Consumer Protection Act, No. 68 of 2008, where applicable

Records may include:

- client terms and conditions;
- client communications;
- complaints records;
- refund or cancellation records;
- marketing and promotional records;
- records relating to services provided to clients.

9.13 Protection of Personal Information Act, No. 4 of 2013

Records may include:

- privacy notices;
- consent records, where applicable;
- data subject request records;
- information security records;
- personal information processing records;
- operator or service provider agreements, where applicable;
- breach or incident records.

9.14 Promotion of Access to Information Act, No. 2 of 2000

Records may include:

- this PAIA Manual;
- PAIA request forms;
- PAIA request register;
- responses to PAIA requests;
- correspondence with requesters;
- Information Officer registration records.

9.15 Financial Intelligence Centre Act, No. 38 of 2001, where applicable

Records may include:

- client identification and verification records, where applicable;
- compliance-related records;
- risk management records;
- transaction records, where applicable.

9.16 Other applicable legislation

Rockjumper Birding Tours CC may also hold records required under any other legislation applicable to its operations as a South African close corporation arranging and operating tours within South Africa.

10. HOW TO REQUEST ACCESS TO RECORDS

A person who wishes to request access to a record held by Rockjumper Birding Tours CC must submit the prescribed PAIA request form to the Information Officer.

The request must:

1. be made in the prescribed form;
2. provide sufficient detail to identify the record requested;
3. provide the requester's contact details;
4. explain the right the requester wishes to exercise or protect;
5. explain why the record is required to exercise or protect that right;
6. state the preferred form of access, for example inspection, copy or electronic copy;
7. include proof of identity, where required; and
8. include proof of authority if the request is made on behalf of another person.

Requests should be sent to:

Information Officer: Clayton Burne

Email: clayton@rockjumper.com

Physical / street address:

ROCKJUMPER HOUSE
1 CROWE STREET
GARLINGTON ESTATE
HILTON
KWA-ZULU NATAL
3245
SOUTH AFRICA

Postal address:

PRIVATE BAG X6009
HILTON
KWA-ZULU NATAL
3245
SOUTH AFRICA

11. REQUEST FEES AND ACCESS FEES

A requester may be required to pay the prescribed request fee and access fee as set out under PAIA.

The Company may require payment of a deposit where the request requires substantial time or resources to process.

Access to records may be withheld until the applicable fees have been paid.

12. DECISION ON ACCESS REQUESTS

Rockjumper Birding Tours CC will respond to a PAIA request within the period prescribed by PAIA.

The Company may:

- grant access to the requested record;
- grant partial access to the requested record;
- refuse access to the requested record; or
- request additional information in order to process the request.

The Company may refuse access where PAIA permits or requires refusal, including where disclosure would involve:

- unreasonable disclosure of personal information of a third party;
- breach of confidentiality;
- prejudice to commercial information;
- prejudice to the safety of individuals or property;
- legally privileged information;

- records relating to legal proceedings;
- confidential supplier or client information;
- records that cannot reasonably be found or do not exist.

13. REMEDIES AVAILABLE TO REQUESTERS

If a requester is dissatisfied with the decision of Rockjumper Birding Tours CC, they may lodge a complaint with the Information Regulator or apply to court for appropriate relief, as provided for in PAIA.

14. PROCESSING OF PERSONAL INFORMATION UNDER POPIA

Rockjumper Birding Tours CC processes personal information in order to arrange and operate specialist birding and wildlife tours **within South Africa**.

The Company may process personal information of South African and international guests where necessary to manage enquiries, bookings, tour arrangements, safety, logistics, payments, emergency response, legal compliance and client communication.

14.1 Categories of data subjects and nature of personal information processed

Rockjumper Birding Tours CC may process personal information relating to the following categories of data subjects:

Category of data subject	Nature / categories of personal information processed
South African clients and prospective clients	Names, surnames, contact details, enquiry details, booking details, payment and invoicing information, communication records, marketing preferences and tour preferences.
International clients and prospective clients travelling to South Africa	Names, surnames, contact details, country of residence, nationality, passport details where required, enquiry details, booking details, payment and invoicing information, emergency contact details, dietary requirements, medical or mobility information voluntarily provided for tour safety or logistics, travel insurance information where applicable, communication records and marketing preferences.
Tour participants	Names, contact details, country of residence, tour participation details, emergency contact details, dietary requirements, medical or mobility information voluntarily provided for tour safety or logistics, passport details where required, incident records where applicable and communication records.
Employees	Names, contact details, identity information, tax information, employment contracts, payroll information, banking details, leave records, performance records, disciplinary records, training records, emergency contact details and employment correspondence.
Contractors, guides and tour leaders	Names, contact details, identity or registration information where applicable, contracts, payment details, banking details, tax information, availability records,

Category of data subject	Nature / categories of personal information processed
	tour allocation records, performance or service records, emergency contact details and correspondence.
South African suppliers, local operators and service providers	Names of contact persons, business contact details, supplier agreements, invoices, banking details, tax information where applicable, service records, insurance confirmations, due diligence information and operational correspondence.
Agents and partners	Names of contact persons, business contact details, agreements, booking correspondence, client-related communication where applicable, commission or payment records and operational correspondence.
Emergency contacts	Names, relationship to traveller or employee, telephone numbers, email addresses and other contact details provided for emergency purposes.
Website users and newsletter subscribers	Names, email addresses, enquiry details, marketing preferences, website interaction information, subscription records and communication records.
Regulators, public bodies and professional advisers	Names, business contact details, correspondence, regulatory submissions, legal records, audit records, tax records and compliance records.

14.2 General categories of personal information processed

The Company may process the following general categories of personal information, depending on the relationship with the data subject and the purpose for which the information is required:

- names and surnames;
- contact details;
- physical, postal and email addresses;
- country of residence;
- nationality;
- passport details, where required for tour arrangements, accommodation, identification, emergency response or travel logistics;
- identity numbers, where required for employment, tax, statutory or legal purposes;
- date of birth, where required;
- emergency contact details;
- South African tour and booking details;
- dietary requirements;
- medical, mobility or health-related information voluntarily provided and necessary for tour safety or logistics;
- payment, invoicing and banking information;
- insurance-related travel information, where applicable;
- employment and contractor information;
- supplier and partner information;
- tax and statutory information;
- correspondence and communication records;
- marketing preferences;
- website enquiry and subscription information;
- incident, complaint or emergency records, where applicable.

14.3 Purpose and reasons for processing personal information

Rockjumper Birding Tours CC processes personal information only where it is necessary for lawful business, operational, contractual, legal, safety, administrative or communication purposes.

Personal information may be processed for the following purposes:

- responding to enquiries from prospective clients, agents, suppliers and partners;
- making and managing bookings for South African tours;
- arranging accommodation, transport, guiding and tour logistics within South Africa;
- communicating with clients before, during and after tours;
- managing client preferences, dietary requirements, medical or mobility information where voluntarily provided and necessary for tour safety or logistics;
- issuing invoices, processing payments and maintaining accounting records;
- communicating with suppliers, guides, tour leaders, local operators and service providers;
- managing emergency or incident situations during South African tours;
- assisting with insurance, emergency assistance or safety-related matters where applicable;
- meeting legal, tax, accounting, employment and regulatory obligations;
- managing employees, contractors, guides and tour leaders;
- managing supplier and partner relationships;
- maintaining company records and internal administration;
- responding to PAIA, POPIA or other lawful requests;
- sending marketing communications where permitted by law or where consent has been obtained where required;
- improving services, client experience and tour operations;
- protecting the rights, property and safety of the Company, clients, employees, suppliers and partners;
- detecting, preventing or responding to fraud, misuse of systems, security incidents or unlawful activity.

14.4 Persons or categories of persons to whom personal information may be disclosed

Rockjumper Birding Tours CC may disclose or disseminate personal information to the following persons or categories of persons where it is necessary, lawful and relevant to the purpose for which the information was collected or processed:

Person / category of recipient	Purpose of disclosure
South African accommodation providers	To arrange accommodation for South African tours.
South African transport providers	To arrange road transfers, vehicle logistics and transport services for tours within South Africa.
Local ground handlers and operators	To arrange and manage tour logistics within South Africa.
Tour leaders and guides	To manage tour participation, client requirements, safety, logistics and emergency response.
Travel agents and booking partners	To manage enquiries, bookings, client communication, payment arrangements and tour administration.

Person / category of recipient	Purpose of disclosure
Emergency assistance providers	To assist in emergency, medical, incident or safety-related situations.
Insurers and insurance brokers	To assist with claims, emergency assistance, liability matters or insurance-related requirements.
Payment processors, banks and financial institutions	To process payments, refunds, invoices and financial transactions.
Accountants, auditors and tax advisers	To manage accounting, audit, tax, financial reporting and compliance obligations.
Legal advisers and professional consultants	To obtain legal, compliance, contractual or professional advice.
IT, software, hosting and system service providers	To operate booking systems, email systems, websites, data storage, cybersecurity, backups and business administration systems.
Marketing and communication service providers	To send newsletters, marketing communication or client updates where permitted by law.
Regulators, government departments and public bodies	To comply with legal, regulatory, tax, employment, PAIA, POPIA or statutory obligations.
Employees, contractors and authorised representatives of the Company	To perform lawful business, operational, administrative, finance, client service, safety and compliance functions.
International clients, agents or partners	Where necessary to manage bookings, payments, communication, emergency assistance or administration relating to South African tours.

The Company will only disclose personal information where there is a lawful basis to do so, where the disclosure is necessary for the relevant purpose, or where the Company is required or permitted to do so by law.

15. TRANSBORDER FLOWS OF PERSONAL INFORMATION

Rockjumper Birding Tours CC arranges and operates tours within South Africa. However, the Company may have planned or recurring transborder flows of personal information because guests and clients may reside outside South Africa, and certain communication, booking, payment, IT, marketing or administrative systems may involve the transfer, access or storage of personal information outside South Africa.

Personal information may be transferred, accessed or stored outside South Africa in the following circumstances:

- where international clients or prospective clients communicate with the Company from outside South Africa;
- where international clients, agents or partners require booking, payment, itinerary, emergency or administrative information relating to South African tours;
- where cloud-based systems, email systems, booking systems, payment systems, marketing platforms, data storage, backup systems, IT support systems or communication tools are hosted or accessed outside South Africa;

- where information is shared with insurers, emergency assistance providers, payment processors, banks, professional advisers or service providers who may operate outside South Africa;
- where communication with overseas agents, clients or partners is required to manage bookings, payments, client communication or emergency assistance relating to South African tours.

The Company will take reasonable steps to ensure that personal information transferred outside South Africa is protected in accordance with POPIA and applicable data protection requirements. Where appropriate, the Company will consider contractual safeguards, confidentiality obligations, access controls and security measures to protect personal information involved in transborder flows.

16. TECHNOLOGY AND SECURITY MEASURES USED TO PROTECT PERSONAL INFORMATION

Rockjumper Birding Tours CC takes reasonable technical and organisational measures to protect personal information against loss, damage, unauthorised access, unlawful processing, disclosure or destruction.

The Company uses or may use the following types of technology and security measures to help ensure the suitable and appropriate security, confidentiality, integrity and availability of personal information under its care:

16.1 Access control and user management

- user access controls;
- password protection;
- role-based access to systems and information;
- limiting access to personal information to authorised staff, contractors or service providers who require access for lawful business purposes;
- review and removal of access where access is no longer required.

16.2 System and email security

- secure email and system access;
- password-protected systems;
- anti-virus, anti-malware or endpoint security tools, where applicable;
- security controls on business systems, websites and communication platforms;
- monitoring of suspicious or unauthorised activity where applicable.

16.3 Data storage, backup and availability

- secure storage of electronic and physical records;
- data backup processes;
- use of reputable cloud, hosting, email, booking, accounting, communication and administration systems;
- measures to support the availability of business-critical records and systems;
- secure filing or storage of physical documents where applicable.

16.4 Confidentiality and internal controls

- staff confidentiality obligations;
- supplier and service provider confidentiality obligations;
- limited access to sensitive information;
- internal policies, procedures and controls relating to personal information;
- reasonable checks before releasing records to prevent unauthorised disclosure.

16.5 Integrity and retention controls

- retention and deletion practices;
- reasonable steps to keep personal information accurate, complete and up to date where required;
- secure deletion, destruction or anonymisation of records when no longer required;
- incident response procedures where a data breach or security incident is suspected.

16.6 External service providers

Where the Company uses external IT, hosting, software, communication, payment, marketing or administration service providers, the Company will take reasonable steps to ensure that such providers apply appropriate security measures to protect personal information processed on behalf of the Company.

These measures are reviewed and updated where necessary, taking into account the nature of the personal information processed, the risks involved, the Company's operations and available technology.

17. RETENTION OF RECORDS

Records are retained only for as long as reasonably required for lawful business, legal, tax, accounting, regulatory, operational or historical purposes.

Where records are no longer required, the Company will take reasonable steps to securely delete, destroy or anonymise them.

18. AVAILABILITY OF THIS MANUAL

This Manual is available as prescribed in section 51(3)(a) and 51(3)(b) of PAIA.

This Manual is available:

- on the Company's website, where applicable;
- at the Company's registered or principal place of business for public inspection during normal business hours;
- upon request from the Information Officer;
- to any person upon request and upon payment of a reasonable prescribed fee, where applicable;

- to the Information Regulator, where required.

Requests for a copy of this Manual may be directed to the Information Officer using the contact details set out in this Manual.

19. UPDATING OF THIS MANUAL

This Manual will be reviewed periodically and updated where necessary, including when there are changes to:

- the Company's contact details;
- the Head of the Body, Information Officer or Deputy Information Officer;
- the categories of records held;
- the Company's processing of personal information;
- the persons or categories of persons to whom personal information may be disclosed;
- transborder flows of personal information;
- security measures used to protect personal information;
- applicable law or regulatory guidance.

20. APPROVAL

This PAIA and POPIA Manual was approved by Rockjumper Birding Tours CC.

Prepared by: Clayton Burne

Capacity: Information Officer / Operations Manager

Approved by: Adam Riley

Capacity: Member / Head of the Body

For: Rockjumper Birding Tours CC

Date: 26/06/2026

Signature: _____ *Adam Riley*

ANNEXURE A: PAIA REQUEST FORM

Requesters must use the prescribed PAIA request form when requesting access to records. The latest prescribed forms are available from the Information Regulator's website.

ANNEXURE B: INTERNAL PAIA REQUEST REGISTER

Rockjumper Birding Tours CC should keep a register of PAIA requests received.

ANNEXURE C: DOCUMENT CONTROL

Version	Date	Description	Prepared by	Approved by
1.0	26/06/2026	First PAIA and POPIA Manual	Clayton Burne	Adam Riley