PAIA MANUAL

Section/Paragraph number	Rev. No	Amendments	Date	Name
New document	0	N/A	Feb 2021	L. Hanekom
Entire document	1	Updated company info, added business type, added Section 10 PAIA Guide, added Statutory Records, added Availability of Records, added reference to Information Request Procedure & form	May 2021	L. Hanekom
Par 1.9, 1.10, 1.11 & 1.12	2	Added reference to Data Safeguards, Privacy Policy, Data Breach Response & Information Security Policies, updated Data Management & Control table	June 2021	L. Hanekom

1. PAIA MANUAL OF OAKHURST HOTEL

1.1 COMPANY INFO

PHYSICAL ADDRESS	:	119 Meade St, George Central, George, 6530
TELEPHONE NUMBER	:	+27(0)448747130
RESERVATIONS	:	reservations@oakhursthotel.co.za
WEBSITE	:	http://oakhursthotel.co.za/
INFORMATION OFFICER	:	Leon de Kock
EMAIL ADDRESS	:	leon@f1group.co.za
DEPUTY INFORMATION OFFICER	:	Sharon Jantjies
EMAIL ADDRESS	:	hr@thewildernesshotel.co.za

BUSINESS TYPE:
The organisation conducts its main type of business in the following sector(s):

Business sector:	Applicable ☑ = Yes
Agriculture, forestry and fishing	☐
Mining and Quarrying	☐
Manufacturing (incl Space industry)	☐
Electricity, Gas & Water	☐
Construction	☐
Retail & Motor Trade and Repair Services	☐
Wholesale and retail trade, hotels and restaurants	☑
Transport, storage and communication	☐
Finance, real estate and business services	☐
General government services	☐
Personal services	☐

1.2 DEFINITIONS

PAIA means the Promotion of Access to Information Act 2 of 2000.

POPI means the Protection of Personal Information Act 4 of 2013.

Information Regulator means the Regulator established in terms of Section 39 of POPI.

Person means a natural person or a juristic person.

Private body means:

- a natural person who carries or has carried on any trade, business or profession, but only in such capacity;
- a partnership which carries or has carried on any trade, business or profession; or
- any former or existing juristic person, but excludes a public body.

Public body means:

- any department of state or administration in the national or provincial sphere of government or any municipality in the local sphere of government; or
- any other functionary or institution when:
  - exercising a power or performing a duty in terms of the Constitution or a provincial constitution; or
  - exercising a public power or performing a public function in terms of any legislation.

Head, in relation to, a private body means:

- in the case of a natural person, that natural person or any person duly authorised by that natural person;
- in the case of a partnership, any partner of the partnership or any person duly authorised by the partnership;
- in the case of a juristic person:
  - the chief executive officer or equivalent officer of the juristic person or any person duly authorised by that officer; or
  - the person who is acting as such or any person duly authorised by such acting person.

Information Officer means the head of a private body.

Deputy Information Officer means the person to whom any power or duty conferred or imposed on an Information Officer by POPI has been delegated;

Requester in relation to a private body**,** means any person, including, but not limited to public body or an official thereof, making a request for access to a record of the organisation or a person acting on behalf of such person;

Personal Requester means a requester seeking access to a record containing personal information about the requester;

Personal Information means information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person, including, but not limited to: information relating to the race, gender, sex, pregnancy, marital status, national, ethnic or social origin, colour, sexual orientation, age, physical or mental health, well-being, disability, religion, conscience, belief, culture, language and birth of the person; information relating to the education or the medical, financial, criminal or employment history of the person; any identifying number, symbol, e-mail address, physical address, telephone number, location information, online identifier or other particular assignment to the person, the biometric information of the person; the personal opinions, views or preferences of the person; correspondence sent by the person that is implicitly or explicitly of a private or confidential nature or further correspondence that would reveal the contents of the original correspondence; the views or opinions of another individual about the person; and the name of the person if it appears with other personal information relating to the person or if the disclosure of the name itself would reveal information about the person.

Request for access means a request for access to a record of the organisation in terms of section 50 of PAIA.

Record means any recorded information regardless of the form or medium, in the possession or under the control of the organisation irrespective of whether or not it was created by the organisation.

Data Subject means the person to whom personal information relates.

Third Party in relation to a request for access to a record held by the organisation, means any person other than the requester.

Processing means any operation or activity or any set of operations, whether or not by automatic means, concerning personal information, including the collection, receipt, recording, organisation, collation, storage, updating or modification, retrieval, alteration, consultation or use, dissemination by means of transmission, distribution or making available in any other form, or merging, linking, as well as restriction, degradation, erasure or destruction of information.

1.3 PURPOSE OF THIS PAIA MANUAL

The Promotion of Access to Information Act, 2000, gives effect to section 32 of the Constitution, which provides that everyone has the right to access information held by the State or any other person (or private body), when that information is required for the exercise or protection of any rights.

The purpose of PAIA is to:

- foster a culture of transparency and accountability in public and private bodies by giving effect to the right of access to information, and to
- actively promote a society in which the people of South Africa have effective access to information to enable them to fully exercise and protect all of their rights.

The organisation recognises everyone's right to access to information and is committed to provide access to the organisation's records where the proper procedural requirements as set out by PAIA and POPI have been met.

1.4 DUTIES OF THE INFORMATION OFFICER

The Information Officer and/or the Deputy Information Officer of the organisation are responsible for:

- Publishing and proper communication of the manual i.e. creating policy awareness;
- The facilitation of any request for access;
- Providing adequate notice and feedback to the requester;
- Determining whether to grant a request for access to a complete/full record or only part of a record;
- Ensuring that access to a record, where so granted, is provided timeously and in the correct format;
- Reviewing the policy for accuracy and communicating any amendments.

Right of Access

The Information Officer and/or Deputy Information Officer may only provide access to any record held by the organisation to a requester if:

- The record is required for the exercise or protection of any right, and
- The requester complies with the procedural requirements relating to a request for access to that record, and
- Access to that record is not refused in terms of any of the grounds for refusal listed below.

Grounds for Refusal

The Information Officer and/or Deputy Information Officer must assess whether there are any grounds for refusing a request for access. Where any grounds for refusal are found, a request for access will not be granted. However, despite finding any grounds for refusal, access to the record(s) will be provided where:

- the disclosure of the record would reveal evidence of a substantial contravention of, or failure to comply with the law or imminent and serious public or environmental risk, and
- the public interest in disclosing record, will clearly outweigh the harm contemplated in the provision in question.

Where there are no grounds for refusal, request for access will be granted. If a request for access is made with regards to a record containing information that would justify a ground for refusal, every part of the record which

- does not contain; and
- can reasonably be severed from any part that contains, any such information must, despite any other provision of PAIA, also be disclosed.

The grounds for refusal, or absence thereof, are set out below:

A: Mandatory Protection of privacy of a Third Party who is a Natural Person

Grounds for Refusal:

- The disclosure would involve the unreasonable disclosure of personal information about a third party that is a natural person; (including a deceased individual)

No Grounds for Refusal:

- The record consists of information that concerns an individual who has already consented in writing to its disclosure to the requester concerned;
- The record consists of information that is already publicly available;
- The record consists of information that was given to the organisation by the individual to whom it relates and the individual was informed by or on behalf of the organisation, before it is given, that the information belongs to a class of information that would or might be made available to the public;
- The record consists of information about an individual's physical or mental health, or well-being, who is under the care of the requester and who is under the age of 18; or incapable of understanding the nature of the request, and if giving access would be in the individual's best interest;
- The record consists of information about an individual who is deceased and the requester is the individual's next of kin or making the with the written consent of the individual's next of kin;
- The record consists of information about an individual who is or was an official of the organisation and which relates to the position or functions of the individual, including, but not limited to the title, work address, work phone number, the classification, salary scale or remuneration and responsibilities of the position heled or services performed by the individual and the name of the individual on a record prepare by the individual in the course of employment.

B: Mandatory Protection of Commercial Information of a Third Party

Grounds for Refusal

- The record consists of information that contains trade secrets of a third party;
- The record consists of information that contains financial, commercial, scientific or technical information, other than trade secrets, of a third party, the disclosure of which would be likely to cause harm to the commercial or financial interests of that third party;
- The record consists of information supplied in confidence by a third party, the disclosure of which could reasonably be expected to put that third party at a disadvantage in contractual or other negotiations or to prejudice that third party in commercial competition.

No Grounds for Refusal

- The record consists of information about a third party who has consented who has already consented in writing to its disclosure to the requester concerned;
- The record consists of information about the results of any product or environmental testing or other investigation supplied by a third party or the results of any such testing or investigation carried out by or on behalf of a third party and its disclosure would reveal a serious public safety or environmental risk; (the results of any product or environmental testing or other investigation do not include the results of preliminary)
- testing or other investigation conducted for the purpose of developing methods of testing or other investigation.

C: Mandatory Protection of certain Confidential Information of a Third Party

Grounds for Refusal

- The record consists of information the disclosure of which would constitute an action for breach of a duty of confidence owed to a third party in terms of an agreement

D: Mandatory Protection of Safety of Individuals and Protection of Property

Grounds for Refusal

- The record consists of information that if disclosed could reasonably be expected to endanger the life or physical safety of an individual
- The record consists of information that if disclosed would likely prejudice or impair the security of a building, a structure or system, a computer or communication system, a means of transport, any other property
- The record consists of information that if disclosed would likely prejudice or impair the security of methods, systems, plans or procedures for the protection of an individual in accordance with a witness protection scheme, the safety of the public, or any part of the public, or the security of property

E: Mandatory Protection of Records privileged from Production in Legal Proceedings

Grounds for Refusal

- The record consists of information privileged from production in legal proceedings unless the person entitled to the privilege has waived the privilege.

F: Commercial Information of the Organisation

Grounds for Refusal

- The record consists of information that contains trade secrets of the organisation;
- The record consists of information that contains financial, commercial, scientific or technical information, other than trade secrets, of the organisation, the disclosure of which would likely cause harm to the commercial or financial interests of the organisation;
- The record consists of information, the disclosure of which, could reasonably be expected to put the organisation at a disadvantage in contractual or other negotiations or prejudice the organisation in commercial competition;
- The record is a computer program as defined in section 1(1) of the Copyright Act (Act 98 of 1978), owned by the organisation, except insofar as it is required to give access to a record to which access is granted in terms of PAIA.

No Grounds for Refusal

- The record consists of information about the results of any product or environmental testing or other investigation supplied by the organisation or the results of any such testing or investigation carried out by or on behalf of the organisation and its disclosure would reveal a serious public safety or environmental risk. (the results of any product or environmental testing or other investigation do not include the results of preliminary testing or other investigation conducted for the purpose of developing methods of testing or other investigation)

G: Mandatory Protection of Research Information of a Third Party and the Organisation

Grounds for Refusal

- The record consists of information that contains information about research being or to be carried out by or on behalf of a third party, the disclosure of which would be likely to expose the

third party, a person that is or will be carrying out the research on behalf of the third party, or the subject matter of the research to serious disadvantage;

- The record consists of information that contains information about research being or to be carried out by or on behalf of the organisation, the disclosure of which would be likely to expose the organisation, a person that is or will be carrying out the research on behalf of the organisation, or the subject matter of the research to serious disadvantage.

NOTICE

Where a request for access has been received the Information Officer and/or Deputy Information Officer will notify the requester of receipt and the prescribed fee (if any) that is payable prior to processing the request. Please refer to Annexure E for a full breakdown of fees payable. Personal requesters will not be charged a request fee.

The notice must state:

- The amount of the deposit payable; (if any)
- That the requester may lodge a complaint with the Information Regulator or an application with a court against the tender or payment of the request fee, or the tender or payment of a deposit, as the case may be;
- The procedure (including the period) for lodging the complaint with the Information Regulator or the Application.

Except to the extent that the provisions regarding third party notification may apply, the Information Officer and/or Deputy Information Officer to whom the request is made, must as soon as reasonably possible, but in any event within 30 days, after the request has been received in the prescribed format:

- Decide in accordance with PAIA whether to grant the request, and
- Notify the requester of the decision and, if the requester stated that he or she wishes to be informed of the decision in any other manner, inform him or her in that manner, if it is reasonably possible.

If the request for access is granted, the notice must state:

- The access fee (if any) to be paid upon access;
- The form in which access will be given, and
- That the requester may lodge a complaint with the Information Regulator or an application with a court against the access fee to be paid or the form of access granted, and the procedure, including
  the period allowed, for lodging a complaint with the Information Regulator or the application.

If the request for access is refused, the notice must:

- State adequate reasons for the refusal, including the relevant provision of PAIA that was relied on;
- Exclude, from any such reasons, any reference to the content of the records' and;
- State that the requester may lodge a complaint with the Information Regulator or an application with a court against the refusal of the request, and the procedure (including the period) for lodging a complaint with the Information Regulator or the application.

Should all reasonable steps have been taken to find a record requested, and there are reasonable grounds for believing that the record:

- is in the organisation's possession, but cannot be found; or
- simply does not exist;
- the head of the organisation must, by way of affidavit or affirmation, notify the requester that it is not possible to provide access to that record;
- the affidavit or affirmation must provide full account of all steps taken to find the record in question or to determine whether the record exists, as the case may be, including all communication with every person who conducted the search on behalf of the head.

1.5 SECTION 10 PAIA GUIDE

PAIA grants a requester access to records of a private body, if the record is required for the exercise or protection of any rights. Where a public body lodges a request, the public body must be acting in the public interest.

Requests in terms of PAIA shall be made in accordance with the prescribed procedures at the rates provided.

Requesters are referred to the guide in terms of section 10 of the Act which has been compiled by the South African Human Rights Commission. The guide contains information for the purposes of exercising Constitutional rights.

The guide is available in all South African official languages free of charge and any person may request a copy of the guide.

A copy of the guide may be obtained by contacting the South African Human Rights Commission at:

Postal Address: The South African Human Rights Commission, PAIA Unit, Private Bag 2700, Houghton, 2041
Telephone Number: +27(0)118773600
Fax Number: +27(0)114030625
Website: www.sahrc.org.za

1.6 STATUTORY RECORDS

The organisation maintains statutory records and information in terms of the following legislation:

Legislation:	Applicable ☑ = Yes
Administration of Estates Act	☑
Arbitration Act	☐

Auditing Professions Act	☐
Basic Conditions of Employment Act	☑
Closed Corporations Act	☑
Collective Investment Schemes Control Act	☐
Companies Act	☐
Compensation of Occupational Injuries & Diseases Act	☑
Constitution of the Republic of South Africa	☐
Consumer Protection Act	☑
Copyright Act	☐
Customs and Excise Act	☐
Electronic Communications and Transactions Act	☑
Emergency services by-law	☑
Employment Equity Act	☑
Fertilizers, Farm Feeds, Agricultural Remedies and Stock Remedies Act	☑
Financial Advisory & Intermediary Services Act	☐

Financial Institutions (Protection of Funds) Act	☐
Financial Intelligence Centre Act	☐
Friendly Societies Act	☐
Hazardous Substances Act	☑
Health Professions Act	☐
Income Tax Act	☑
Insolvency Act	☐
Labour Relations Act	☑
Long-term Insurance Act	☑
Medical Schemes Act	☐
Medicines and Related Substances Act	☐
National Building Regulations and Standards Act	☑
National Credit Act	☐
National Health Act	☑
National Road Traffic Act	☐
Nursing Act	☑

Occupational Health and Safety Act	☑
OHASA General Administrative Regulations	☑
OHASA General Safety Regulations	☑
OHASA General Machinery Regulations	☑
OHASA Driven Machinery Regulations	☑
OHASA Electrical Machinery Regulations	☑
OHASA Electrical Installation Regulations	☑
OHASA Environmental Regulations	☑
OHASA Hazardous Chemical Substance Regulations	☑
OHASA Facilities Regulations	☑
OHASA Asbestos Regulations	☐
OHASA Pressure Equipment Regulations	☑
OHASA Major Hazard Installation Regulations	☐
OHASA Noise Induced Hearing Loss Regulations	☐
OHASA Hazardous Biological Agents Regulations	☐
OHASA Lead Regulations	☐

OHASA Construction Regulations	☑
Patents Act	☐
Pension Funds Act	☑
Prevention of Organised Crime Act	☐
Prevention and Combatting of Corrupt Activities Act	☐
Promotion of Access to Information Act	☑
Promotion of Equality and Prevention of Unfair Discrimination Act	☑
Protected Disclosures Act	☐
Protection of Constitutional Democracy against Terrorist and related Activities Act	☐
Protection of Personal Information Act	☑
Short-term Insurance Act	☑
Skills Development Act	☑
The National Code of Practice for Training Providers to Lifting machine operators	☐
Trademarks Act	☐
Tobacco Products Control Act	☐
Unemployment Insurance Act	☑

Value Added Tax Act	☑

1.7 AVAILABILITY OF RECORDS

This section provides a list of records held by the organisation along with an indication of whether the record is freely available or only accessible by way of a formal request in terms of the provisions of PAIA. The section also provides a description of the category of data subject(s) to whom the respective records relates along with an indication of the purpose for which the record is being kept. Records that are indicated as "Freely Available" can be accessed by contacting the Deputy Information Officer without having to follow any formal procedures. Records that are indicated as a "PAIA Request", requires the requester to lodge a formal request.

The status of the record's availability, the purpose for its processing and the relevant data subject category to who the record relates are set out below:

Category:	Record:	Availability:	Purpose:	Data Subject:
Public Affairs	Public Corporate Records	Freely Available	Convey Public Information	Organisation
	Media Releases	Freely Available	Convey Public Information	Organisation
	Published Newsletters	Freely Available	Convey Public Information	Organisation
	Magazine Articles	Freely Available	Convey Public Information	Organisation
	Permits, Licenses or Authorizations	Freely Available	Statutory Requirement	Organisation
Regulatory & Administrative	Substance Abuse Policy	Freely Available	Statutory Requirement	Organisation
	Corporate and Social Responsibility Policy	Freely Available	Statutory Requirement	Organisation
	FICA Internal Rules	PAIA Request	Statutory Requirement	Organisation
	SHE Plan & Policies	PAIA Request	Statutory Requirement	Organisation
	Disciplinary Policy	PAIA Request	Statutory Requirement	Organisation
	HR Manual - Code of Conduct	PAIA Request	Statutory Requirement	Organisation
	Memorandum of Incorporation	PAIA Request	Statutory Requirement	Organisation
	Minutes of Board or Directors Meetings	PAIA Request	Statutory Requirement	Organisation
	Register of Members	PAIA Request	Statutory Requirement	Organisation
	Register of Board	PAIA Request	Statutory	Organisation

	of Directors		Requirement	
	Internal correspondence (e-mails/memos)	PAIA Request	Internal Communications	Employees
	Employment Applications	PAIA Request	Internal Referencing	Employees
Human Resources	Employment Contracts	PAIA Request	Contractual Agreement	Employees
	Personal Information of Employees	PAIA Request	Internal Referencing	Employees
	Employment Equity Plan	PAIA Request	Statutory Requirement	Organisation
	Medical Records	PAIA Request	Internal Referencing	Employees
	Pension Fund Records	PAIA Request	Internal Referencing	Employees
	Disciplinary Records	PAIA Request	Statutory Requirement	Employees
	Performance Management Records	PAIA Request	Internal Referencing	Employees
	Salary Records	PAIA Request	Internal Referencing	Employees
	Employee Benefit Records	PAIA Request	Internal Referencing	Employees
	PAYE Records	PAIA Request	Statutory Requirement	Employees
	Seta Records	PAIA Request	Statutory Requirement	Employees
	Disciplinary Code	PAIA Request	Statutory Requirement	Organisation
	Leave Records	PAIA Request	Internal Referencing	Employees
	Training Records	PAIA Request	Internal Referencing	Employees
	Training Manual	PAIA Request	Internal Referencing	Organisation
	Financial Statements	PAIA Request	Internal Referencing	Organisation
Financial	Financial and Tax Records	PAIA Request	Statutory Requirement	Organisation
	Asset Register	PAIA Request	Internal Referencing	Organisation
	Management Accounts and Reports	PAIA Request	Internal Referencing	Organisation
	Vouchers, Cash Books and Ledgers	PAIA Request	Internal Referencing	Organisation
	Banking Records and Statements	PAIA Request	Internal Referencing	Organisation
	Electronic Banking	PAIA Request	Internal	Organisation

	Records		Referencing	
	Market Information	PAIA Request	Internal Referencing	Organisation
Marketing	Product / Service Brochures	PAIA Request	Internal Referencing	Organisation
	Advertisements	PAIA Request	Internal Referencing	Organisation
	Performance Records	PAIA Request	Internal Referencing	Organisation
	Service Sales Records	PAIA Request	Internal Referencing	Organisation
	Marketing Strategies	PAIA Request	Internal Referencing	Organisation
	Customer / Client Database	PAIA Request	Internal Referencing	Customers
	Customer / Client agreements	PAIA Request	Internal Referencing	Customers
Client / Customer / External Provider	Customer / Client Reservation Details	PAIA Request	Internal Referencing	Customers
	Customer / Client Files	PAIA Request	Internal Referencing	Customers
	Customer / Client Instructions	PAIA Request	Internal Communications	Customers
	Customer / Client Correspondence	PAIA Request	External Communications	Customers
	Rental agreements	PAIA Request	Contractual Agreement	Third Party
	Supplier / Contractor Agreements / Contracts	PAIA Request	Contractual Agreement	Third Party
Third Party	Non-disclosure agreements	PAIA Request	Risk Management	Third Party
	Letters of Intent	PAIA Request	Contractual Agreement	Third Party

1.8 INFORMATION REQUEST PROCEDURE

Refer to the company's Information Request Procedure. (SOP19)

1.9 PRIVACY POLICY

The Privacy Policy of the company describes our policies and procedures on the collection, use and disclosure of information when using the services of Oakhurst Hotel and informs the user about their privacy rights and how the law protects them. (refer: Company Privacy Policy, Document number: WIPP01)

1.10 DATA SAFEGUARDS

Oakhurst Hotel will ensure data isn't lost, damaged, destroyed or accessed without authorization.

Complying with this rule will involve auditing security, putting safeguards in place and then maintaining and updating those safeguards. The company will also ensure that the third party (outsourced process as per ISO 9001:2015) used to process & store personal information, follows this rule.

If a data breach happens, Oakhurst Hotel will inform the Information Regulator and, if known, the relevant data subjects as **soon as possible** unless law enforcement officials ask the company to delay doing so.

Below table details data security implemented to prevent loss of confidentiality, improper use or loss of integrity:

DATA MANAGEMENT & CONTROL	WHO	WHAT	WHERE	HOW	WHEN
INTEGRITY	Windows 10 - Isolated Domain	Windows 10 Kernel Data Protection (KDP)	Oakhurst Hotel Premises – All Laptop & Desktop Computers Utilised for Work Purposes	Manual – Ref. https://docs.microsoft.com/en-us/windows/security/threat-protection/windows-firewall/configure-data-protection-quick-mode-settings	Weekly
ACCESS	Windows 10 - Isolated Domain	Windows Defender Firewall with Advanced Security	Oakhurst Hotel Premises – All Laptop & Desktop Computers Utilised for Work Purposes	Manual – Ref. https://docs.microsoft.com/en-us/windows/security/threat-protection/windows-firewall/restrict-access-to-only-specified-users-or-devices	Monthly
NETWORK ACCESS	Windows 10 - Isolated Domain	Windows Defender Firewall with Advanced Security	Oakhurst Hotel Premises – All Laptop & Desktop Computers Utilised for Work Purposes	Manual – Ref. https://docs.microsoft.com/en-us/windows/security/threat-protection/windows-firewall/restrict-access-to-only-specified-users-or-devices	Weekly
BACKUPS	Windows 10 - Isolated Domain	Google Cloud / Apple iCloud	Oakhurst Hotel Premises –	Automated – Ref. https://www.google.com/intl/en_cy/d	Daily

			All Laptop & Desktop Computers Utilised for Work Purposes	rive/download/ Automated – Ref. https://support.apple.com/en-za/HT204247	
ANTI-VIRUS	Windows 10 - Isolated Domain	Microsoft Windows Defender real-time and cloud-delivered protection / Third-party antivirus	Oakhurst Hotel Premises – All Laptop & Desktop Computers Utilised for Work Purposes	Automated – Ref. https://docs.microsoft.com/en-us/mem/intune/user-help/turn-on-defender-windows	24/7
DATABASE AND MODULES UPDATES	Windows 10 - Isolated Domain	Windows 10 Update Assistant	Oakhurst Hotel Premises – All Laptop & Desktop Computers Utilised for Work Purposes	Automated – Ref. https://support.microsoft.com/en-us/windows/update-windows-10-3c5ae7fc-9fb6-9af1-1984-b5e0412c556a	Weekly
UPS	Windows 10 - Isolated Domain	No UPS for Desktops. Laptops do not need a UPS	Oakhurst Hotel Premises – All Laptop & Desktop Computers Utilised for Work Purposes	Automated - PowerGuide Management Software – Ref. http://www.powermonitor.software/#PowerGuideSoftware	Daily
DISASTER RECOVERY	Windows 10 - Isolated Domain	Backup to external HDD's	Oakhurst Hotel Offsite Premises	Computers can be bare metal restored from backup, but disaster recovery solution is not comprehensive enough - Contingency Plans need to be created as per SOP-30, par 4.1	6 Monthly

1.11 DATA BREACH RESPONSE

Oakhurst Hotel has drawn up a Data Breach Response Policy which main aim is to focus significant attention on data security and data security breaches and how the company established a culture of openness, trust and integrity & how to respond to such activity. The policy also specifies the goals and the vision for the breach response process. (Refer to: Data Breach Response Policy, rev0)

1.12 INFORMATION SECURITY

To further ensure the protection of information and prevention of unauthorized use and to maintain the confidentiality of all information, Oakhurst Hotel also implemented the following policies:

- Acceptable Use Policy;
- Clean Desk Policy;
- Disaster Recovery Plan Policy;
- Password Protection Policy;
- Technology Equipment Disposal Policy;
- Pandemic Response Planning Policy;
- Software Installation Policy;
- Social Networking Policy;
- Email Policy;
- Ethics Policy.

1.13 GUIDANCE NOTES

- In terms of section 51 of the Promotion of Access to Information Act ('the Act') all private bodies (i.e. any natural or juristic person who carries on any trade, business or profession) must compile a manual complying with prescribed requirements;
- The governing body of the organisation must approve the processes set out in this document and complete any outstanding sections where so required;
- The governing body of the organisation must confirm the adoption of the processes set out in this document;
- Relevant staff members are required to confirm that they understand their assigned duties and responsibilities; (print additional copies of the sheet where so required)
- The completed manual must be submitted to the South African Human Rights Commission. Please e-mail the signed copy to: lidlamini@sahrc.org.za and post a hard copy to the following address: The SA Human Rights Commission, PAIA Unit, Private Bag 2700, Houghton, 2041;
- Retain an original hard copy of this document in the organisation's Compliance Manual;
- The document must at all times be accessible to the Information Regulator to be established in terms of POPI and relevant staff members;
- The document must be published on the website, if any, of the organisation;
- The document must be made available at the principal place of business of the organisation during normal business hours;
- The document must be made available to any person upon request and upon payment of a reasonable amount.