Section 51 PAIA Manual AIRLINK

PAIA Manual

This manual was prepared in accordance with section 51 of the Promotion of Access to Information Act, 2000 and to address requirements of the Protection of Personal Information Act, 2013.

This manual applies to

AIRLINK PROPRIETARY LIMITED

(hereinafter "Airlink")

Revised PAIA Manual: Airlink Proprietary Limited

Company Registration Number: 1969/002554/07 Promotion of Access to Information Act (PAIA), 2000

Owner of Policy: Information Officer

Date: 03 September 2025

Next review date: February 2026

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1. List of Acronyms and Abbreviations

1.1. Manual Airlink's Section 51 PAIA Manual

1.2. PAIA Promotion of Access to Information Act No. 2 of 2000

(as amended)

1.3. POPIA Protection of Personal Information Act No.4 of 2013

1.4. Regulator Information Regulator

2. Purpose of This Manual

This Manual is useful for the public to:

- 2.1. check the categories of records held by Airlink that are available without having to submit a formal PAIA request;
- 2.2. have sufficient understanding of how to request access to a record of Airlink by providing a description of the subjects on which we hold records, and the categories of records held on each subject;
- 2.3. know the description of the records of Airlink which are available in terms of any other legislation;
- 2.4. access all the relevant contact details of the Information Officer and Deputy Information Officer(s) who will assist the public with the records they intend to access;
- 2.5. know the description of the guide on how to use PAIA, as updated by the Information Regulator, and how to obtain access to it;
- 2.6. know if we will process personal information, the purpose of processing personal information, the description of the categories of data subjects and the information or categories of information applicable;
- 2.7. know the description of the categories of data subjects and the information or categories of information applicable;
- 2.8. know the recipients or categories of recipients to whom the personal information may be supplied;
- 2.9. know if we have planned to transfer or process personal information outside the Republic of South Africa and the recipients or categories of recipients to whom the personal information may be supplied; and
- 2.10. know whether we have appropriate security measures to ensure the confidentiality, integrity and availability of personal information to be processed.

3. Contact Details for Access to Information on Airlink

- 3.1. Airlink is a scheduled air transportation service provider, operating flights across South Africa and beyond.
- 3.2. Airlink falls within the definition of a "private body" and this Manual has been compiled in accordance with the said provisions and to fulfil the requirements of the Act.
- 3.3. The following contact people are responsible for the administration of and compliance with the Act in a fair, objective and unbiased manner:

(a) Information Officer

Name and surname	De Villiers Engelbrecht
Telephone number	+27 11 451 7300
Email Address	dev@flyairlink.com
Physical address	Airlink Proprietary Limited, 3 Greenstone Hill Office Park, Emerald Boulevard, Modderfontein, 1609
Postal Address	P.O. Box 7529, Bonaero Park, 1622

(b) Deputy Information Officers

Name and surname	Jenean Green
Telephone number	+27 11 451 7300
Email Address	jgreen@flyairlink.com
Physical address	Airlink Proprietary Limited, 3 Greenstone Hill Office Park, Emerald Boulevard, Modderfontein, 1609
Postal Address	P.O. Box 7529, Bonaero Park, 1622

Name and surname	Katherine Whelan
Telephone number	+27 11 451 7300
Email Address	katherinew@flyairlink.com
Physical address	Airlink Proprietary Limited, 3 Greenstone Hill Office Park, Emerald Boulevard, Modderfontein, 1609

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Postal Address	P.O. Box 7529, Bonaero Park, 1622
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Name and surname	Kariska Engels
Telephone number	+27 11 451 7300
Email Address	kengels@flyairlink.com
Physical address	Airlink Proprietary Limited, 3 Greenstone Hill Office Park, Emerald Boulevard, Modderfontein, 1609
Postal Address	P.O. Box 7529, Bonaero Park, 1622

(c) Head Office

Physical address	Airlink (Proprietary) Limited 3 Greenstone Hill Office Park Emerald Boulevard Modderfontein 1609
Postal Address	P.O. Box 7529, Bonaero Park, 1622
Telephone number	+27 11 451 7300
Email Address	info@flyairlink.com
Website address	https://www.flyairlink.com/

4. Your Rights as a Data Subject under PAIA

- 4.1. Under PAIA, everyone has the right to access -
 - (a) any information held by the State; and
 - (b) any information that is held by another person and that is required for the exercise or protection of any rights.
- 4.2. Records Airlink makes available under PAIA are described in Part C of this Manual. If you wish to make a request under PAIA, please follow the procedure described in paragraph 10 of this Manual. Please note that your request will be subject to the applicable charges set out in paragraph 10.3 of this Manual.
- 4.3. You can learn more about your rights under PAIA by contacting the office of the Information Regulator at:

INFORMATION REGULATOR

Address Physical:	Woodmead North Office Park, 54 Maxwell Drive, Woodmead, Johannesburg, 2001
Address Postal:	P.O Box 31533, Braamfontein, Johannesburg, 2017
Tel No:	+27 (0) 10 023 5200
Email – POPIA Complaints:	POPIAComplaints@inforegulator.org.za on the webpage https://inforegulator.org.za/wp-content/uploads/2020/07/InfoRegSA-PAIA-Form05-Reg10-2.pdf
Email: PAIA Complaints:	PAIAComplaints@inforgulator.org.za on the webpage https://inforegulator.org.za/wp-content/uploads/2020/07/InfoRegSA-PAIA-Form05-Reg10-2.pdf
Web Address:	https://inforegulator.org.za/paia-guidelines/

4.4. The Information Regulator has produced detailed guidance on how to exercise your rights under PAIA. This guidance (known as the PAIA Section 10 Guide) is available from the website of the Information Regulator and can be accessed on the Information Regulator's website - https://inforegulator.org.za/paia-guidelines/.

5. Guide on How to Use PAIA and How to Obtain Access to the Guide

- 5.1. The Information Regulator has produced detailed guidance on how to exercise your rights under PAIA. This guidance (known as the PAIA Section 10 Guide) is available from our website and registered offices during normal office hours, upon request to the Information Officer, in the following two official languages:
 - (a) English
 - (b) Afrikaans
- 5.2. The PAIA Section 10 Guide can also be accessed on the website of the Information Regulator (https://inforegulator.org.za/paia-guidelines/) where it is available in the following languages: English Afrikaans isiNdebele isiXhosa isiZulu Siswati Sepedi Sesotho Setswana Tshivenda Xitsonga, as well as braille.
- 5.3. Members of the public can inspect or make copies of the PAIA Section 10 Guide from the registered Head during normal working hours.
- 5.4. The PAIA Section 10 Guide contains the description of-
 - (a) the objects of PAIA and POPIA;

- (b) the postal and street address, phone and fax number and, if available, electronic mail address of -
 - (i) the Information Officer of every public body, and
 - (ii) every Deputy Information Officer of every public and private body designated in terms of section 17(1) of PAIA and section 56 of POPIA;
- (c) the manner and form of a request for -
 - (i) access to a record of a public body contemplated in section 11 of PAIA; and
 - (ii) access to a record of a private body contemplated in section 50 of PAIA;
- (d) the assistance available from the Information Officer of a public body in terms of PAIA and POPIA;
- (e) the assistance available from the Regulator in terms of PAIA and POPIA;
- (f) all remedies in law available regarding an act or failure to act in respect of a right or duty conferred or imposed by PAIA and POPIA, including the manner of lodging
 - (i) an internal appeal;
 - (ii) a complaint to the Regulator; and
 - (iii) an application to a court against a decision by the Information Officer of a public body, a decision on internal appeal, a decision by the Regulator or a decision of the head of a private body;
- (g) the provisions of sections 14 and 51 of PAIA requiring a public body and private body, respectively, to compile a manual, and how to obtain access to a manual;
- (h) the provisions of sections 15 and 52 of PAIA providing for the voluntary disclosure of categories of records by a public body and private body, respectively;
- (i) the notice issued in terms of sections 22 and 54 of PAIA regarding fees to be paid in relation to requests for access; and
- (i) the regulations made in terms of section 92 of PAIA.

6. Categories of Records of Airlink that are Available Without a Person Having to Request Access

6.1. You can access the following records without a formal PAIA request:

e of record	How to get access
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Airlink's website content	www.flyairlink.com
Company records	https://www.cipc.co.za/
Airlink's Information Regulator's Profile	https://inforegulator.org.za/
Public relations brochures and media releases	www.flyairlink.com
PAIA Manual	www.flyairlink.com
PAIA Guidelines	https://inforegulator.org.za/paia- guidelines/
Privacy Notice for website	www.flyairlink.com
Terms and conditions	www.flyairlink.com

7. Description of the Records of Airlink Available in Accordance with Any Other Legislation

- 7.1. Airlink, where applicable to its operations, also retain records and documents in terms of the legislation below.
- 7.2. Unless disclosure is prohibited in terms of legislation, regulations, contractual agreement or otherwise, records that are required to be made available in terms of these Acts shall be available for inspection by interested parties in terms of the requirements and conditions of the specific Act and PAIA, should such interested parties be entitled to such information.
- 7.3. A request to access must be made in accordance with the provisions of PAIA and POPIA.
 - (a) Basic Conditions of Employment Act, 1997
 - (b) Broad-based Black Economic Empowerment Act, 2003
 - (c) Civil Aviation Act, 2009
 - (d) Companies Act, 2008
 - (e) Compensation for Occupational Injuries and Diseases Act, 1993
 - (f) Competition Act, 1998
 - (g) Consumer Protection Act, 2008
 - (h) Debt Collectors Act, 1998
 - (i) Employment Equity Act, 1998
 - (j) Financial Advisory and Intermediary Services Act, 2002

- (j) Income Tax Act, 1962
- (k) Intellectual Property Act, 2013
- (I) International Air Services Act, 1993
- (m) Labour Relations Act, 1995
- (n) Long-Term Insurance Act, 1998
- (o) National Credit Act, 2005
- (p) National Energy Act, 2008
- (q) Pension Funds Act, 1956
- (r) Prescription Act, 1969
- (s) Promotion of Access to information Act, 2000
- (t) Protection of Personal Information Act, 2013
- (u) Short Term Insurance Act, 1998
- (v) Skills Development Levies Act, 1999
- (w) Unemployment Insurance Act, 2001
- (x) Unemployment Insurance Contributions Act, 2002
- (v) Value Added Tax Act, 1991
- 7.4. We acknowledge that the above list may be incomplete. Should it come to our attention that existing or new legislation provides a Requester access on a basis other than as set out in this Manual, we shall update the list accordingly.
- 7.5. If a Requester is of the opinion that they have a right of access to information of records that exist in terms of legislation that is not included in the abovementioned list, they may inform the Information Officer of the said legislation and the Information Officer may, in turn, have the opportunity to consider the Requester's request, which the Information Officer has the right to deny on grounds as set out in this Manual as well as in POPIA. These records may be requested under PAIA, subject to privacy and confidentiality restrictions.
- 8. Description of the Subjects on Which Airlink Holds Records and Categories of Records Held on Each Subject

8.1. You may request the following records, subject to Airlink's right to refuse access (e.g., to protect privacy or commercial confidentiality):

Subjects on which we hold records	Categories of records
ministration	Licenses
Administration	Air Operators Certificate
	List of directors
	Minute books and resolutions
mpany documents	Share register
	Shareholder's agreements
	Statutory registers
	Litigation
	Appeals
Documents Relating to Legal Proceedings	Contracts and memorandums of understanding
	Regulatory permissions, licenses, and/or exemptions
	Internal policies and procedures
	Employee records, including employee information, employment histories and health records
	Training schedules and material
Human resources	Minutes of meetings
	Internal evaluation records
	Records which a third party has provided to Airlink about any of its personnel
	Other internal records and correspondence
	Job applicant references
Customor resords	Records about a customer provided by the customer or a third party
Customer records	Records generated by Airlink relating to customers, including transactional records
Summling goods	Records about a supplier provided by the supplier or a third party
Supplier records	Records generated by Airlink relating to suppliers, including transactional records
Airlink operational records	Financial records

Databases
Information Technology
Marketing records
Project Management, including building plans and plant and machinery upgrades
Functions and catering
Patents, registered designs, and trademarks
Technological know-how
Product records
Internal correspondence
Company secretarial records
Retirement fund records
Statutory records
Statutory compliance records
Internal policies and procedures
Treasury-related records
Securities and equities

8.2. Note: Customer and supplier records containing personal information are protected under POPIA and may require consent or legal justification for access.

9. POPIA: Processing of Personal Information

9.1. Purpose of Processing Personal Information

Categories of data subjects	Purpose for processing personal information
Employees, officers, directors, past and present including applicants for any such positions	Comply with legislation (including the Labour Relations Act, Basic Conditions of Employment Act, Employment Equity Act, and Compensation for Occupational Injuries and Diseases Act
	Performance reviews
	Disciplinary proceedings
	Manage relationships
	Establish, exercise or defend a right or obligation in terms of a contract

Past and present suppliers	Establish, exercise or defend a right or obligation in terms of a contract
	To pursue the legitimate interests of the Firm or a third party to whom the information is supplied.
	To pursue the legitimate interests of the Firm or a third party to whom the information is supplied.
	To pursue the legitimate interests of the Firm or a third party to whom the information is supplied.
	Establish, exercise or defend a right or obligation in terms of a contract
Customers, business partners, past	To pursue the legitimate interests of the Firm or a third party to whom the information is supplied.
and present	To pursue the legitimate interests of the Firm or a third party to whom the information is supplied.
	To pursue the legitimate interests of the Firm or a third party to whom the information is supplied.
	Establish, exercise or defend a right or obligation in terms of a contract
Contractors and sub-contractors of Airlink past and present	To pursue the legitimate interests of the Firm or a third party to whom the information is supplied.
	To ensure compliance with an obligation imposed by law
	Manage relationships
Sponsors, sponsored people, and	Establish, exercise or defend a right or obligation in terms of a contract
	To ensure compliance with an obligation imposed by law
entities, past and present	Manage relationships
	To pursue the legitimate interests of the Firm or a third party to whom the information is supplied

9.2. Description of the categories of data subjects and the information or categories of information relating thereto

Categories of data subjects	Personal information that may be processed
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Employees, officers, directors, past and present including applicants for any such positions	Personnel related information concerning applications for employment, employment records, reviews and notes concerning such data subjects, income and benefits records, performance and disciplinary records, payment-related records, records relating to leave and termination of employment, and identifying and contact information
Past and present suppliers	Identifying and contact information including that of relevant employees, payment-related records, reviews, notes concerning the supplier and contractual information
Customers, business partners, past and present	Identifying and contact information of customers and business partners including that of relevant employees, payment-related records, reviews, notes concerning such customers and business partners and contractual information
Contractors and sub-contractors of Airlink past and present	Identifying and contact information of contractors and sub-contractors including that of relevant employees, payment-related records, reviews, notes concerning such contractors and sub-contractors and contractual information
Sponsors, sponsored people, and entities, past and present	Identifying and contact information of sponsors, sponsored persons and entities including that of relevant employees, payment-related records, reviews, notes concerning sponsors, sponsored persons and entities and contractual information

9.3. The recipients categories of recipients to whom the personal information may be supplied

- a) Other companies in the Company's group
- b) Management, employees, temporary staff
- c) Sub-contracted operators
- d) Stakeholders and shareholders
- e) Service providers
- f) Medical aid, pension or provident funds
- g) Auditing and accounting bodies (internal and external)
- h) Third parties with whom the Company has contracted for the retention of data
- i) Relevant authorities, government departments, statutory bodies or regulators

j) A court, administrative or judicial forum, arbitration or statutory commission making a request in terms of the applicable laws or rules

The above list is non-exhaustive.

9.4. Planned transborder flows of personal information

- (a) Airlink may transfer your personal information to recipients outside of the Republic of South Africa.
- (b) Airlink will ensure compliance with POPIA in relation to any cross-border transfers of personal information. For example, we will ensure that the third party who is the recipient of the information is subject to a law or binding agreement which provides for an adequate level of protection similar to POPIA.

9.5. General description of information security measures to be implemented by the responsible party to ensure the confidentiality, integrity, and availability of the information

- (a) Airlink takes reasonable, appropriate and adequate technical and organisational measures to ensure that your personal information is kept secure and is protected against unauthorised or unlawful processing, accidental loss, destruction, damage, alteration, disclosure or unauthorised access. We contractually mandate any third party to which your personal information is transferred to do the same.
- (b) Airlink regularly reviews security controls and related processes to ensure that your personal information is secure. However, where there are reasonable grounds to believe that your personal information has been accessed or acquired by any unauthorised person, we will notify the Regulator and you, unless the Regulator or a public body responsible for detection, prevention or investigation of offences informs us that notifying you will impede criminal investigation.

10. Personal Information Request Procedure

10.1. Form of Request

(a) A request for a record of information in terms of PAIA or personal information in terms of POPIA must be made on Form 2 (Request for Access to Record of Private Body) set out in Annexure "A" to this Manual. A copy of the Request Form is also available from the Regulator's website - https://inforegulator.org.za/wp-content/uploads/2020/07/InfoRegSA-PAIA-Form02-Reg7.pdf.

(b) Please submit the completed form to our Information Officer or Deputy Information Officer together with the relevant request fee as detailed in **paragraph 10.3** below.

10.2. Requester Responsibilities

- (a) The requester must:
 - (i) Pay the fees referred to in paragraph 10.3 below. If a request for access to a record is granted, Airlink will inform you of the bank account into which the fees can be paid;
 - (ii) Provide sufficient detail on the Request Form to enable the Information Officer to identify the record that is being requested. If a reference number is available for the record, it must be provided;
 - (iii) Indicate which form of access to the record is required;
 - (iv) State if he or she wishes to be informed of the decision on the request in any other manner (and if so, state that manner and the necessary particulars to be informed);
 - (v) Identify the right that he or she is seeking to exercise or protect and provide an
 explanation as to why the requested record is required for the exercise or protection of
 that right; and
 - (vi) Otherwise complete the Request Form.
- (b) If a request is made on behalf of another person, the requester must submit proof of the capacity in which he or she is making the request to the satisfaction of the Information Officer.
- (c) Airlink will decide whether to grant or decline the request and give notice (with reasons if the request is declined) within 30 days of receipt of the request.
- (d) The 30-day period may be extended for a further period of not more than 30 days if:
 - (i) The request is for a large volume of records or requires a search through a large volume of records;
 - (ii) The records are situated in, or the search must be conducted in, another town;
 - (iii) Consultations with different divisions of Airlink or another private body are necessary to decide upon the request; or
 - (iv) The requester gives written consent.
- (e) Airlink will notify the requester in writing of an extension

10.3. Fees

- (a) A requester who seeks access to a record containing personal information about that requester is not required to pay the request fee. Every other requester, who is not a personal requester, must pay the required request fee.
- (b) The fees payable in respect of a request for a record are stated in Part 3 of Annexure A of the Regulations Regarding the Promotion of Access to Information (Regulations). The fees stated below are correct as at the date on which this Manual was last updated however if the fees are subsequently changed in the Regulations, Airlink will charge the updated fees.
- (c) The Information Officer will notify the requester (other than a personal requester) by notice, requiring the requester to pay the prescribed fee (if any) before further processing the request.
- (d) The fee for a copy of this Manual is R1,10 for every photocopy of an A4-size page or part thereof.
- (e) The request fee and access fees for information which needs to be requested in terms of PAIA and/or POPIA (a section 53 request) are as follows:

Request fee payable by every requester	R140,00
For every photocopy/printed black and white copy of an A4-size page or part thereof	R2,00
For every printed copy of an A4-size page or part thereof	R2,00
For copy in a computer-readable form on:	
i. flash drive (to be provided by requester)	R40,00
ii. compact disc	R40,00
iii. If provided by the requester	R60,00
If provided to the requester	
For a transcription of visual images, for an A4-size page or part thereof	Service to be outsourced, will depend on quotation from service provider.
For a copy of visual images	Service to be outsourced will depend on quotation from service provider
For a transcription of an audio record, for an A4-size page	R24,00
For a copy of an audio record	
i. Flash drive (to be provided by requester)	R40,00
ii. Compact disk	R40,00

- If provided by requester	R60,00
- If provided to the requester	

11. Availability of the Manual

- 11.1. A copy of the Manual is available:
 - (a) On our website: https://www.flyairlink.com/en/za/legal-and-privacy/paia-act
 - (b) At Airlink's head office for inspection during normal business hours;
 - (c) To any person upon request and upon payment of a reasonable prescribed fee; and
 - (d) To the Information Regulator upon request.
- 11.2. As contemplated in Annexure B of the Regulations, a fee for a copy of the Manual shall be payable per A4-size photocopy made.

ANNEXURE A:

FORM 2

REQUEST FOR ACCESS TO RECORD

[Regulation 7]

NOTE:

- 1. Proof of identity must be attached by the requester.
- 2. If requests made on behalf of another person, proof of such authorisation, must be attached to this form.

TO: The Information	officer				
(Addre	55)				
E-mail address:					
Fax number:					
Mark with an "X"					
Request is made	le in my ow	n name	Reques	est is made on behalf of another pe	erson.
		PERSONAL I	NFORMATIC	ON	
Full Names					
Identity Number					
Capacity in which request is made (when made on behalf of another person)					
Postal Address					
Street Address					
E-mail Address					
Contact Numbers	Tel. (B): Cellular:			Facsimile:	
Full names of person on whose behalf request is made (if applicable):		1			

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Identity Number							
Postal Address							
Street Address							
E-mail Address							
Contact Numbers	Tel. (B)			F	Facsimile		
	Cellular			•			
	PAR	CICULARS	OF RECOR	RD REQU	JESTED		
Provide full particulars of is known to you, to enabon a separate page and	le the reco	rd to be loca	ated. (If the	provided	space is in	adequate,	
Description of record or relevant part of the record:							
Reference number, if available							
Any further perticulars							
Any further particulars of record							
TYPE OF RECORD (Mark the applicable box with an "X")							

Record is in written or printed form	
Record comprises virtual images (this includes photographs, slides, video recordings, computer-generated images, sketches, etc)	
Record consists of recorded words or information which can be reproduced in sound	
Record is held on a computer or in an electronic, or machine-readable form	
FORM OF ACCESS (Mark the applicable box with an "X")	
Printed copy of record (including copies of any virtual images, transcriptions and information held on computer or in an electronic or machine-readable form)	
Written or printed transcription of virtual images (this includes photographs, slides, video recordings, computer-generated images, sketches, etc)	
Transcription of soundtrack (written or printed document)	
Copy of record on flash drive (including virtual images and soundtracks)	
Copy of record on compact disc drive(including virtual images and soundtracks)	
Copy of record saved on cloud storage server	

MANNER OF ACCESS (Mark the applicable box with an "X") Personal inspection of record at registered address of public/private body (including listening to recorded words, information which can be reproduced in sound, or information held on computer or in an electronic or machine-readable form) Postal services to postal address Postal services to street address Courier service to street address Facsimile of information in written or printed format (including transcriptions) E-mail of information (including soundtracks if possible) Cloud share/file transfer Preferred language (Note that if the record is not available in the language you prefer, access may be granted in the language in which the record is available)

PARTICULARS OF RIGHT TO BE EXERCISED OR PROTECTED				
If the provided space is in	nadequate, please continu requester must sign a		ge and attach it to this Form. The ges.	
Indicate which right is to be exercised or protected				
Explain why the record requested is required for				
the exercise or protection of the aforementioned right:				
	FE	ES		
b) You will be notified c) The fee payable to the reasonable tin	me required to search for a	ess fee to be paid. ends on the form in and prepare a recoi	which access is required and	
You will be notified in writing costs relating to your reque			r denied and if approved the nner of correspondence:	
Postal address	Facsimile	Electronic	c communication (Please specify)	
Signed at	this	day of	20	
Signature of Requester / person on whose behalf request is made				
		icial use		

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Reference number:	
Request received by:	
(State Rank, Name And	
Surname of Information Officer)	
Date received:	
Access fees:	
Deposit (if any):	

Signature of Information Officer