

# NEWMARK

• HOTELS & RESERVES •

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# PAIA MANUAL

Of

**NEWMARK HOTELS & RESERVES (PTY) LTD**

**("NEWMARK")**

Registration Number 2007/006292/07

Prepared in terms of section 51 of the

Promotion of Access to Information Act

2 of 2000 (as amended)

DATE OF COMPILATION: 17/09/2025

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## 1. LIST OF ACRONYMS AND ABBREVIATIONS

- 1.1 **“CEO”** Chief Executive Officer
- 1.2 **“DIO”** Deputy Information Officer;
- 1.3 **“IO”** Information Officer;
- 1.4 **“Minister”** Minister of Justice and Correctional Services;
- 1.5 **“PAIA”** Promotion of Access to Information Act No. 2 of 2000 (as Amended);
- 1.6 **“POPIA”** Protection of Personal Information Act No.4 of 2013;
- 1.7 **“Regulator”** Information Regulator
- 1.8 **“Republic”** Republic of South Africa.

## 2. PURPOSE OF PAIA MANUAL

This PAIA Manual is useful for the public to-

- 2.1 Check the categories of records held by a body which are available without a person having to submit a formal PAIA request;
- 2.2 Have a sufficient understanding of how to make a request for access to a record of the body, by providing a description of the subjects on which the body holds records and the categories of records held on each subject;
- 2.3 Know the description of the records of the body which are available in accordance with any other legislation;
- 2.4 Access all the relevant contact details of the Information Officer and Deputy Information Officer 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 Regulator and how to obtain access to it;

- 2.6 Know if the body will process personal information, the purpose of processing of personal information and the description of the categories of data subjects and of the information or categories of information relating thereto;
- 2.7 Know the description of the categories of data subjects and of the information or categories of information relating thereto;
- 2.8 Know the recipients or categories of recipients to whom the personal information may be supplied;
- 2.9 Know if the body has 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 the body has appropriate security measures to ensure the confidentiality, integrity and availability of the personal information which is to be processed.

### 3. KEY CONTACT DETAILS FOR ACCESS TO INFORMATION OF NEWMARK HOTELS & RESERVES

#### 3.1 Chief Information Officer

Name: Garth Harry Musikanth  
Tel: 021 427 5930  
Email: [garth@newmarkhotels.com](mailto:garth@newmarkhotels.com)

#### 3.2 Deputy Information Officer

Name: Kirsten Candace Jordan  
Tel: 021 427 5927  
Email: [kirsten@newmarkhotels.com](mailto:kirsten@newmarkhotels.com)

#### 3.3 Deputy Information Officer

Name: Sheri-Lee Witz  
Tel: 021 427 5951  
Email: [sheri-lee@newmarkhotels.com](mailto:sheri-lee@newmarkhotels.com)

#### 3.4 Access to information general contacts

Email: [sheri-lee@newmarkhotels.com](mailto:sheri-lee@newmarkhotels.com)

### 3.5 National or Head Office

Postal Address: 2<sup>nd</sup> Floor, Merchant House,  
19 Dock Road,  
V&A Waterfront,  
Cape Town, South Africa  
8000

Physical Address: 2<sup>nd</sup> Floor, Merchant House,  
19 Dock Road,  
V&A Waterfront,  
Cape Town, South Africa  
8000

Telephone: 021 427 5900

Email: [reception@newmarkhotels.com](mailto:reception@newmarkhotels.com)

Website: <https://newmarkhotels.com/>

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

4.1 The Regulator has, in terms of section 10(1) of PAIA, as amended, updated and made available the revised Guide on how to use PAIA ("Guide"), in an easily comprehensible form and manner, as may reasonably be required by a person who wishes to exercise any right contemplated in PAIA and POPIA.

4.2 The Guide is available in each of the official languages and in braille.

4.3 The aforesaid Guide contains the description of PAIA

4.3.1 the objects of PAIA and POPIA;

4.3.2 the postal and street address, phone and fax number and, if available, electronic mail address of-

- 4.3.2.1 the Information Officer of every public body, and
- 4.3.2.2 every Deputy Information Officer of every public and private body designated in terms of section 17(1) of PAIA<sup>1</sup> and section 56 of POPIA<sup>2</sup>;
- 4.3.3 the manner and form of a request for-
  - 4.3.3.1 access to a record of a public body contemplated in section 11<sup>3</sup>; and
  - 4.3.3.2 access to a record of a private body contemplated in section 50<sup>4</sup>;
- 4.3.4 the assistance available from the IO of a public body in terms of PAIA and POPIA;
- 4.3.5 the assistance available from the Regulator in terms of PAIA and POPIA;
- 4.3.6 4.3.6. 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-
  - 4.3.6.1 an internal appeal;
  - 4.3.6.2 a complaint to the Regulator; and
  - 4.3.6.3 an application with a court against a decision by the information officer of a public body, a decision on internal appeal or a decision by the Regulator or a decision of the head of a private body;

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<sup>1</sup> Section 17(1) of PAIA- For the purposes of PAIA, each public body must, subject to legislation governing the employment of personnel of the public body concerned, designate such number of persons as deputy information officers as are necessary to render the public body as accessible as reasonably possible for requesters of its records.

<sup>2</sup> Section 56(a) of POPIA- Each public and private body must make provision, in the manner prescribed in section 17 of the Promotion of Access to Information Act, with the necessary changes, for the designation of such a number of persons, if any, as deputy information officers as is necessary to perform the duties and responsibilities as set out in section 55(1) of POPIA.

<sup>3</sup> Section 11(1) of PAIA- A requester must be given access to a record of a public body if that requester complies with all the procedural requirements in PAIA relating to a request for access to that record; and access to that record is not refused in terms of any ground for refusal contemplated in Chapter 4 of this Part.

<sup>4</sup> Section 50(1) of PAIA- A requester must be given access to any record of a private body if

a) that record is required for the exercise or protection of any rights;

b) that person complies with the procedural requirements in PAIA relating to a request for access to that record; and

c) access to that record is not refused in terms of any ground for refusal contemplated in Chapter 4 of this Part.

- 4.3.7 the provisions of sections 14<sup>5</sup> and 51<sup>6</sup> requiring a public body and private body, respectively, to compile a manual, and how to obtain access to a manual;
- 4.3.8 the provisions of sections 15<sup>7</sup> and 52<sup>8</sup> providing for the voluntary disclosure of categories of records by a public body and private body, respectively;
- 4.3.9 the notices issued in terms of sections 22<sup>9</sup> and 54<sup>10</sup> regarding fees to be paid in relation to requests for access; and
- 4.3.10 the regulations made in terms of section 92<sup>11</sup>.

4.4 Members of the public can inspect or make copies of the Guide from the offices of the public and private bodies, including the office of the Regulator, during normal working hours.

4.5 The Guide can also be obtained-

- 4.5.1 upon request to the Information Officer;
- 4.5.2 from the website of the Regulator (<https://www.justice.gov.za/inforeg/>).

4.6 A copy of the Guide is also available in the following two official languages, for public inspection during normal office hours-

- 4.6.1 English & Afrikaans

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<sup>5</sup> Section 14(1) of PAIA- The information officer of a public body must, in at least three official languages, make available a manual containing information listed in paragraph 4 above.

<sup>6</sup> Section 51(1) of PAIA- The head of a private body must make available a manual containing the description of the information listed in paragraph 4 above.

<sup>7</sup> Section 15(1) of PAIA- The information officer of a public body, must make available in the prescribed manner a description of the categories of records of the public body that are automatically available without a person having to request access

<sup>8</sup> Section 52(1) of PAIA- The head of a private body may, on a voluntary basis, make available in the prescribed manner a description of the categories of records of the private body that are automatically available without a person having to request access

<sup>9</sup> Section 22(1) of PAIA- The information officer of a public body to whom a request for access is made, must by notice require the requester to pay the prescribed request fee (if any), before further processing the request.

<sup>10</sup> Section 54(1) of PAIA- The head of a private body to whom a request for access is made must by notice require the requester to pay the prescribed request fee (if any), before further processing the request.

<sup>11</sup> Section 92(1) of PAIA provides that –“The Minister may, by notice in the Gazette, make regulations regarding-

(a) any matter which is required or permitted by this Act to be prescribed;

(b) any matter relating to the fees contemplated in sections 22 and 54;

(c) any notice required by this Act;

(d) uniform criteria to be applied by the information officer of a public body when deciding which categories of records are to be made available in terms of section 15; and

(e) any administrative or procedural matter necessary to give effect to the provisions of this Act.”

## 5. CATEGORIES OF RECORDS OF NEWMARK HOTELS & RESERVES WHICH ARE AVAILABLE WITHOUT A PERSON HAVING TO REQUEST ACCESS

| Category of records | Types of the Record  | Available on Website | Available upon request |
|---------------------|--|----------------------|------------------------|
| Policies            | <ul style="list-style-type: none"> <li>• Privacy Policy,</li> <li>• Terms &amp; Conditions on use of website,</li> <li>• Cookie Policy</li> </ul>  | X                    | X                      |
| Company information | <ul style="list-style-type: none"> <li>• History of company</li> <li>• Services offered</li> <li>• Company approach &amp; core values</li> <li>• Awards &amp; recognitions</li> <li>• Partners &amp; corporate social responsibility,</li> <li>• Management information</li> <li>• History of company.</li> </ul>  | X                    | X                      |
| Property Portfolio  | <ul style="list-style-type: none"> <li>• List of properties managed &amp; detailed information on each property:                             <ul style="list-style-type: none"> <li>○ Rooms, Services &amp; facilities                                     <ul style="list-style-type: none"> <li>▪ Description of different room options</li> <li>▪ Features of each room type</li> <li>▪ Gallery of each room type</li> <li>▪ Dining services available at property</li> <li>▪ Conferencing &amp; event details, with events fact sheet, menu &amp; enquiry form</li> </ul> </li> <li>○ Packages                                     <ul style="list-style-type: none"> <li>▪ List of offers &amp; promotions available with detailed information on each</li> </ul> </li> <li>○ Video tour</li> <li>○ Gallery of properties offering,</li> <li>○ List of experiences offered                                     <ul style="list-style-type: none"> <li>▪ Information detailing times, experience specifics</li> </ul> </li> <li>○ Location &amp; contact details of property</li> <li>○ FAQ's specific to the property,</li> <li>○ News &amp; articles relating to the property</li> </ul> </li> </ul> | X                    | X                      |



|                 |   |  |  |
|-----------------|---|--|--|
|                 | <ul style="list-style-type: none"> <li>○ Agent STO rates application &amp; Fact Sheet.</li> <li>○ Sustainability information specific to each property</li> </ul> |  |  |
| Contact Details | <ul style="list-style-type: none"> <li>• Head-office &amp; Property Contact details</li> <li>• Head-Office &amp; Property Locations</li> </ul>                    |  |  |

## 6. DESCRIPTION OF THE RECORDS OF NEWMARK HOTELS WHICH ARE AVAILABLE IN ACCORDANCE WITH ANY OTHER LEGISLATION

| Applicable Legislation  | Category of Records  |
|---|--|
| Basic Conditions of Employment Act 75 of 1997                             | <ul style="list-style-type: none"> <li>• All employee information such as: <ul style="list-style-type: none"> <li>○ Name, Occupation, ID Number, date of employment commencement</li> <li>○ Time worked by each employee including ordinary hours, overtime and time worked on Sundays and Public Holidays.</li> <li>○ Remuneration paid to each employee including allowances, deductions etc</li> <li>○ records of leave taken</li> <li>○ All other records required by the Act</li> </ul> </li> </ul> |
| Companies Act (No. 71 of 2008)  | <ul style="list-style-type: none"> <li>• Documents of Incorporation</li> <li>• Registration documents</li> <li>• Memorandum of Incorporation</li> <li>• Any general or special resolutions passed by Shareholders</li> <li>• Register of members, shareholders, directors, company secretary</li> <li>• Annual Financial Statements</li> <li>• All other records required by the Act</li> </ul>  |
| Compensation for Occupational Injuries and Diseases Act (No. 130 of 1993) | The register or other record of the earnings and other prescribed particulars of all employees, for example, wages paid, time worked and payment made for piecework and overtime   |
| Consumer Protection Act (No. 68 of 2008)                                  | <ul style="list-style-type: none"> <li>• Transaction records</li> <li>• Product information</li> <li>• Contracts and agreements</li> <li>• Marketing and advertising records</li> <li>• Complaint and resolution records</li> </ul>  |

|   |   |
|---|---|
| Electronic Communications and Transactions Act (No. 25 of 2002) | <ul style="list-style-type: none"> <li>• Electronic transaction records</li> <li>• Contracts and agreements</li> <li>• Communication records</li> <li>• Security and authentication records</li> </ul>  |
| Employment Equity Act (No. 55 of 1998)                          | <ul style="list-style-type: none"> <li>• Employment Equity Plan</li> <li>• Workforce Profile</li> <li>• All other records required by the Act</li> </ul>  |
| Foodstuffs, Cosmetics and Disinfectants Act (No. 54 of 1972)    | <ul style="list-style-type: none"> <li>• Product information and specifications</li> <li>• Quality control and testing records</li> <li>• Packaging and labeling records</li> <li>• Recall and complaint records</li> </ul>   |
| Health Act (No. 63 of 1977)                                     | <ul style="list-style-type: none"> <li>• Health and safety policies</li> <li>• Workplace safety records</li> <li>• Training records</li> </ul>  |
| Income Tax Act (No. 58 of 1962)                                 | <ul style="list-style-type: none"> <li>• All ledgers, cash books, journals, cheque books, bank statements, deposit slips, pay cheques, invoices, stock lists and all other books of account</li> <li>• Signed copy of Annual Financial Statements</li> <li>• Books of Account recording information required by the Companies Act</li> <li>• Invoices - issued and received</li> <li>• All other records required by the Act</li> </ul> |
| Labour Relations Act (No. 66 of 1995)                           | <ul style="list-style-type: none"> <li>• All records required in compliance with any collective agreement, arbitration award or determination</li> <li>• All records of the prescribed details of any strike, lock-out or protest action involving the Company's employees</li> <li>• All disciplinary records</li> <li>• All other records required by the Act</li> </ul>  |
| Occupational Health & Safety Act (No. 85 of 1993)               | <ul style="list-style-type: none"> <li>• A copy of the Act</li> <li>• An incident register certificate of compliance (in respect of all electrical installations)</li> <li>• First Aid certificate (valid for 3 years)</li> <li>• Refrigeration / air-conditioning record book</li> <li>• All other records required by the Act</li> </ul>  |
| Promotion of Access to Information Act (No. 2 of 2000)          | PAIA Manual   |

|   |   |
|---|---|
| Protection of Personal Information Act (POPIA)<br>(No. 4 of 2013) | <ul style="list-style-type: none"> <li>• Data processing records</li> <li>• Privacy policies and notices</li> <li>• Data breach incident records</li> <li>• Retention records</li> <li>• Training records</li> <li>• Consent records</li> <li>• Data processing agreements</li> </ul> |
| Skills Development Act 97 of 1998                                 | <ul style="list-style-type: none"> <li>• Annual training reports and the annual training plan.</li> <li>• All other records required by the Act</li> </ul>  |
| Skills Development Levy Act 9 of 1999                             | <ul style="list-style-type: none"> <li>• Training records</li> <li>• Training plans and reports</li> <li>• Employment equity plans and reports</li> <li>• Learnership records</li> <li>• Employee records</li> </ul>  |
| Unemployment Insurance Act (No. 30 of 1966)                       | Records detailing the contributions employed by the employer in respect of earnings paid, time worked, payments made for piece work and overtime  |
| Value-Added Tax Act (VAT) (No. 89 of 1991)                        | <ul style="list-style-type: none"> <li>• Tax invoices, debit notes and credit notes</li> <li>• Records of supplies and purchases</li> <li>• Books of account</li> <li>• Banking records</li> <li>• All other documents required by SARS and the Act</li> </ul>                        |

## 7. DESCRIPTION OF THE SUBJECTS ON WHICH THE BODY HOLDS RECORDS AND CATEGORIES OF RECORDS HELD ON EACH SUBJECT BY NEWMARK HOTELS

| Subjects on which the body holds records | Categories of records   |
|--|---|
| Company                                  | <ul style="list-style-type: none"> <li>• Company registration documents (CIPC)</li> <li>• Memorandum of Incorporation</li> <li>• Share registers &amp; resolutions</li> <li>• Minutes of directors' meetings</li> <li>• Policies &amp; procedures</li> </ul>  |
| Financial Records                        | <ul style="list-style-type: none"> <li>• Annual financial statements</li> <li>• Management accounts</li> <li>• Budgets &amp; forecasts</li> <li>• VAT and tax records (as per VAT Act, Income Tax Act)</li> <li>• Invoices (guest invoices, supplier invoices)</li> <li>• Payment records &amp; receipts</li> </ul> |

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|   |  |
|---|--|
|   | <ul style="list-style-type: none"> <li>• Banking records</li> </ul>  |
| Human Resources                         | <ul style="list-style-type: none"> <li>• Employment contracts</li> <li>• Employee personal records (ID, contact details, emergency contacts)</li> <li>• Payroll &amp; remuneration records</li> <li>• Leave records</li> <li>• Training &amp; skills development records</li> <li>• Disciplinary records &amp; grievance procedures</li> <li>• UIF, PAYE, and other statutory records (as per BCEA, UIF Act, SDL Act)</li> </ul> |
| Food & Beverage / Liquor                | <ul style="list-style-type: none"> <li>• Liquor licence &amp; related compliance records</li> <li>• Food safety &amp; hygiene inspection records</li> <li>• Supplier contracts (food, beverage suppliers)</li> <li>• Menus &amp; pricing schedules</li> </ul>  |
| Guest/Customer Records                  | <ul style="list-style-type: none"> <li>• Booking and reservation records</li> <li>• Guest registration details (IDs, passports if required)</li> <li>• Payment records (credit card, EFTs)</li> <li>• Customer complaints &amp; compliments</li> <li>• Marketing &amp; promotional records (mailing lists, consent forms – POPIA applies)</li> </ul>   |
| Information Technology / Communications | <ul style="list-style-type: none"> <li>• IT policies &amp; security policies</li> <li>• Software licences &amp; IT service contracts</li> <li>• CCTV and access control records</li> <li>• Emails and electronic communication records (ECTA requirements)</li> <li>• Website &amp; online booking system records</li> </ul>   |
| Legal & Compliance                      | <ul style="list-style-type: none"> <li>• Agreements with third parties (franchise, management, leases)</li> <li>• Insurance policies and claims records</li> <li>• Litigation records</li> <li>• PAIA &amp; POPIA compliance documents</li> <li>• Tourism Act compliance / grading certificates</li> </ul>   |
| Operations                              | <ul style="list-style-type: none"> <li>• Health &amp; safety records (OHS Act)</li> <li>• Fire safety certificates &amp; compliance records</li> <li>• Security logs, visitor logs</li> <li>• Maintenance records (rooms, facilities, lifts, fire systems)</li> </ul>  |

|                               |  |
|-------------------------------|--|
|                               | <ul style="list-style-type: none"> <li>• Environmental / waste management records (if applicable)</li> </ul>                               |
| Suppliers & Service Providers | <ul style="list-style-type: none"> <li>• Contracts and SLAs with suppliers</li> <li>• Procurement records &amp; purchase orders</li> </ul> |

## 8. PROCESSING OF PERSONAL INFORMATION

### 8.1 Purpose of Processing Personal Information

The purpose of the Protection of Personal Information Act (POPIA) is to promote the protection of personal information of individuals and businesses and to give effect to their right of privacy as provided for in the Constitution.

Newmark processes Company processes personal information only for lawful and reasonable purposes, including:

- Managing guest reservations, check-in, stay, and check-out.
- Verifying identity and processing payments.
- Providing accommodation, food, beverages, spa and other hospitality services.
- Complying with legal and regulatory obligations (e.g. immigration, tax, health and safety, liquor licensing, labour laws).
- Managing the employment relationship (recruitment, payroll, leave, training, performance management, statutory reporting).
- Administering supplier and service provider contracts.
- Conducting marketing and promotional activities, where lawful consent has been obtained.
- Maintaining security and access control (CCTV, visitor logs, key cards).
- Handling customer queries, feedback, and complaints.
- Keeping accurate financial and business records.

Personal information is processed only to the extent necessary for these purposes, in compliance with the Promotion of Access to Information Act, 2000 and the Protection of Personal Information Act, 2013.

### 8.2 Description of the categories of Data Subjects and of the information or categories of information relating thereto

| Categories of Data Subjects | Personal Information that may be processed   |
|-----------------------------|--|
| Guests / Customers          | Name, address, date of birth, registration numbers or identity numbers, passport details, nationality employment status and bank |

|  |   |
|--|---|
|  | /financial details, contact details, payment or credit card details, billing address, proof of payment or bank details, VAT related information, reservation details, guest preferences, check-in / check-out details, CCTV footage , visitor logs, access card records, vehicle registration details, food allergies or dietary requirements, medical conditions, COVID screening information, communication records, marketing & consent information. |
| Employees                                  | Names, identity numbers address, qualifications, gender, health/medical, race, religion, children, spouse and family, beneficiaries, medical, criminal, financial, employment history, trade union membership, opinions and views, credit, curriculum vitae, biometric  |
| Contractors, service providers & Suppliers | names, registration number, vat numbers, address, trade secrets and bank details  |
| Directors and shareholders                 | Names, addresses, identity numbers, registration numbers, employment status, BBBEE information and banking details, income tax numbers, email addresses, telephone and cellphone numbers, physical addresses, postal addresses and gender.  |

The above list is non-exhaustive.

### 8.3 The recipients or categories of recipients to whom the personal information may be supplied

| Category of Personal Information   | Recipients or Categories of Recipients to whom the personal information may be supplied |
|--|---|
| Credit and payment history, for credit information                                     | Credit Bureaus  |
| Identity number and names, for criminal checks   | South African Police Services   |
| Particulars of members for administration of medical aid schemes and related products. | Medical Schemes & Financial Advisors  |
| Information as legally required  | Group Companies and Affiliates  |

The above list is non-exhaustive.

### 8.4 Planned transborder flows of personal information

| Country in which Personal Information is Stored | Categories of Personal Information  |
|---|---|
| Frankfurt Germany                               | All guest details & booking information received via Oracle PMS (Property Management System) (Opera) which is a revenue tool used within the hospitality industry |

Newmark Hotels has a central reservations department that takes bookings from guests all over the world. This would therefore involve the cross-border transfer of personal information of these guests however Newmark's servers where the information is stored are within the Republic of South Africa.

Newmark also uses certain software in order to operate its hospitality business, whose servers may be outside the Republic of South Africa as set out above. These software companies will be subject to their own GDPR or POPIA legislation specific to the country in question.

#### **8.5 General description of Information Security Measures to be implemented by the responsible party to ensure the confidentiality, integrity and availability of the information**

We have implemented reasonable technical and organisational measures to ensure the safety of all information.

These measures include:

- Physical security measures
- Access control measures
- Encryption measures
- Cyber security measures
- Anti-virus measures
- Security firewalls
- Password control
- Employee training and awareness
- Policies

### **9. AVAILABILITY OF THE MANUAL**

#### **9.1 A copy of the Manual is available-**

- 9.1.1 on <https://newmarkhotels.com/#> , if any;
- 9.1.2 head office of Newmark Hotels for public inspection during normal business hours;
- 9.1.3 to any person upon request and upon the payment of a reasonable prescribed fee; and
- 9.1.4 to the Information Regulator upon request.

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9.2 A fee for a copy of the Manual, as contemplated in annexure B of the Regulations, shall be payable per each A4-size photocopy made.

## 10. UPDATING OF THE MANUAL

10.1 The head of Newmark Hotels will on a regular basis update this manual.

Issued by



**Garth Musikanth**

**Chief Financial Officer**