



PAIA MANUAL

of

Trains Planes and Automobiles Pty Ltd t/a Atlantic Rail

(Private Body)

Document Name:

PAIA Manual — Section 51 of the Promotion of Access to Information Act, No. 2 of 2000

Entity:

Trains Planes and Automobiles Pty Ltd t/a Atlantic Rail

Registration No:

2017/003939/07

Version: 1.0

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Prepared By: Daniel Botha

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1. INTRODUCTION

This manual has been compiled in terms of Section 51 of the Promotion of Access to Information Act, No 2 of 2000 ("PAIA") and serves as the PAIA Manual for Trains Planes and Automobiles Pty Ltd t/a Atlantic Rail ("Atlantic Rail").

Trains Planes and Automobiles Pty Ltd t/a Atlantic Rail recognises the constitutional right of access to information as enshrined in section 32 of the Constitution of the Republic of South Africa, 1996, which gives every person the right of access to any information held by a private body that is required for the exercise or protection of any right.

2. THE ACT

The Promotion of Access to Information Act, 2 of 2000 ("PAIA") gives effect to the constitutional right of access to information. PAIA strives to balance the right of access to information with other fundamental rights to ensure that both the right of privacy and the right of access to information are honoured and upheld.

In order to exercise or protect any rights, you may request access to records of a private body. This manual guides you on how to do so.

3. PURPOSE OF THE MANUAL

This PAIA Manual assists you to:

3.1

Check the categories of records held by Trains Planes and Automobiles Pty Ltd t/a Atlantic Rail which are available without a person having to submit a formal PAIA request;

3.2

Have a sufficient understanding of how to make a request for access to a record of Trains Planes and Automobiles Pty Ltd t/a Atlantic Rail, by providing a description of the subjects on which Trains Planes and Automobiles Pty Ltd t/a Atlantic Rail holds records and the categories of records held on each subject;

3.3

Know the description of the records of Trains Planes and Automobiles Pty Ltd t/a Atlantic Rail which are available in accordance with any other legislation;

3.4

Access all the relevant contact details of the Information Officer and Deputy Information Officer(s) who will assist you with the records you intend to access;

3.5

Know the description of the guide on how to use PAIA, as updated by the Information Regulator, and how to obtain access to it;

3.6

Know if Trains Planes and Automobiles Pty Ltd t/a Atlantic Rail processes personal information and the purpose of processing of personal information;

3.7

Know the description of the categories of data subjects and the information or categories of information relating thereto;

3.8

Know the recipients or categories of recipients to whom the personal information may be supplied;

3.9

Know if Trains Planes and Automobiles Pty Ltd t/a Atlantic Rail plans 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

3.10

Know whether Trains Planes and Automobiles Pty Ltd t/a Atlantic Rail has appropriate security measures to ensure the confidentiality, integrity and availability of the personal information which is to be processed.

4. CONTACT DETAILS

Information Officer

Name:
Daniel Botha
Title:
Managing Director
Physical Address:
ERF 775, Pearl Valley Estate Paarl, 7646
Postal Address:
ERF 775, Pearl Valley Estate Paarl, 7646
Telephone No:
079 401 9353
E-mail:
bookings@ceresrail.co.za

Deputy Information Officer

No Deputy Information Officer has been appointed at this time.

General Information

Name of Private Body:
Trains Planes and Automobiles Pty Ltd t/a Atlantic Rail
Registration No:
2017/003939/07
Physical Address:
ERF 775, Pearl Valley Estate, Paarl, 7646
Postal Address:
ERF 775, Pearl Valley Estate, Paarl, 7646
Website:
www.ceresrail.co.za
Email:
bookings@ceresrail.co.za
Telephone:
079 401 9353

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

The Information Regulator has published a guide containing information to assist persons who wish to exercise rights in terms of PAIA.

The guide is available from the Information Regulator as follows:

Organisation:

The Information Regulator (South Africa)

Physical Address:

JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001

Postal Address:

P.O. Box 31533, Braamfontein, Johannesburg, 2017

Tel:

(010) 023 5200

Website:

<https://infoeregulator.org.za>

Email:

infoereg@justice.gov.za

6. RECORDS AUTOMATICALLY AVAILABLE TO THE PUBLIC

The following records of Trains Planes and Automobiles Pty Ltd t/a Atlantic Rail are automatically available to the public and may be obtained without a person having to submit a formal request:

Category	Description
Company Information	Memorandum of Incorporation, Certificate of Incorporation, Registration documents
PAIA Manual	This manual, available on the company website at www.ceresrail.co.za
Privacy Statement	Available on the company website and upon request
Website Terms and Conditions	Available on the company website at www.ceresrail.co.za

7. RECORDS OF THE PRIVATE BODY

Trains Planes and Automobiles Pty Ltd t/a Atlantic Rail holds the following categories of records:

Category	Type of Records
Financial Records	Annual financial statements, invoices, bank statements, tax returns, VAT records, management accounts
Human Resources Records	Employment contracts, POPI Addenda, payroll records, leave records, disciplinary records, staff qualifications and compliance records, HOPS records
Customer / Client Records	Booking records, passenger information, payment confirmation records, correspondence, complaints and enquiries
Operational Records	Supplier contracts, operator agreements, train schedules, maintenance records, insurance documentation, heritage operations records
Information Technology Records	Google Workspace data, Google Drive files, cPanel email records, FareHarbor booking data, Respond.io communication records, Xero accounting data
Legal and Compliance Records	PAIA Manual, POPI policies, Data Processing Agreements, CPA/ECTA audit reports, Information Regulator correspondence
Marketing Records	Brochures, website content, social media content, advertising materials, booking platform listings

8. RECORDS REQUIRED IN TERMS OF LEGISLATION

Records are kept in accordance with legislation applicable to Trains Planes and Automobiles Pty Ltd t/a Atlantic Rail, which includes but is not limited to the following:

Category of Records	Applicable Legislation
Memorandum of Incorporation	Companies Act 71 of 2008
PAIA Manual	Promotion of Access to Information Act 2 of 2000
Labour Law	Labour Relations Act, 66 of 1995; Basic Conditions of Employment Act, 75 of 1997
Employment Equity	Employment Equity Act, 55 of 1998
ECTA	Electronic Communications and Transactions Act, 36 of 2005
BBEEE	Broad Based Economic Empowerment Act, 53 of 2003
COIDA	Compensation for Occupational Injuries and Diseases Act, 130 of 1993
Constitution	Constitution of the Republic of South Africa, 108 of 1996
UIF	Unemployment Insurance Act, 63 of 2001
VAT	Value Added Tax Act, 89 of 1991
Skills Development	Skills Development Act, 9 of 1997; Skills Development Levy Act, No. 9
Income Tax	Income Tax Act, 58 of 1962
Personal Information Records	Protection of Personal Information Act 4 of 2013
OHS	Occupational Health and Safety Act 85 of 1993
Consumer Protection	Consumer Protection Act 68 of 2008
Tourism	Tourism Act 3 of 2014

9. PROCESSING OF PERSONAL INFORMATION

Trains Planes and Automobiles Pty Ltd t/a Atlantic Rail processes personal information in accordance with the Protection of Personal Information Act, 4 of 2013 ("POPIA"). The following sets out the relevant details of this processing.

9.1 Purpose for which Personal Information is Processed

Purpose	Description
Service Delivery	To process and confirm passenger bookings, manage reservations via FareHarbor, and deliver heritage rail excursion services
Customer Communication	To communicate with customers via email, WhatsApp, Facebook, Instagram, TikTok, and Respond.io regarding bookings, queries, and updates
Payment Processing	To process payments via dLocal. Note: Atlantic Rail does not have direct access to payment card data processed by dLocal
Employment	To fulfil obligations as an employer, including payroll (SEESA, GreatCloudSoft), staff qualifications and compliance tracking (HOPS), and HR administration
Supplier Management	To manage supplier relationships and fulfil contractual obligations
Legal Compliance	To comply with applicable legislation including POPIA, PAIA, the Labour Relations Act, the Consumer Protection Act, and tax legislation
Direct Marketing	To inform existing customers of new excursions, services, and promotions (subject to opt-in consent)
Website and Digital Operations	To manage the company website, contact forms, and digital communications

9.2 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
Customers / Passengers	Full name, email address, phone number, identity number, emergency contact details, booking history, payment confirmation reference, communication records
Employees / Contractors	Full name, address, qualifications, gender, race, banking details, tax number, identity number, contact details, copies of work permits, emergency contact details, medical fitness certificates, HOPS compliance records

Categories of Data Subjects	Personal Information that may be processed
Suppliers / Service Providers	Business name, registration number, VAT number, address, contact details, banking details, product and service information
Website Users	IP address, browser type, pages visited, contact form submissions, cookie data (as per website T&Cs)

9.3 Recipients or Categories of Recipients to whom Personal Information may be supplied

Category of Personal Information	Recipients or Categories of Recipients
Booking data — name, email, phone, ID number	FareHarbor (Booking Platform) — data hosted outside South Africa (Netherlands)
Payment reference data	dLocal (Payment Processor) — Atlantic Rail does not access raw payment card data
Customer communication data — name, email, phone, messages	Respond.io (Unified Communications Platform) — data hosted outside South Africa; Brevo (Email Marketing Platform) — data hosted outside South Africa
Employee payroll and HR data	SEESA (HR and Payroll Services); GreatCloudSoft (Payroll Software)
Financial and invoicing data	Xero (Accounting Software)
Staff qualifications and compliance data	HOPS (Heritage Operations Processing Software)
Email correspondence	cPanel (Email Hosting)
Company documents and data	Google Drive; Google Workspace (hosted by Google)

9.4 Cross-Border Transfer of Personal Information

Trains Planes and Automobiles Pty Ltd t/a Atlantic Rail transfers personal information outside the Republic of South Africa in the following instances:

Operator	Country	Data Transferred	Basis
FareHarbor	Netherlands (EU)	Booking data: names, email addresses, phone numbers, ID numbers	Necessary for performance of contract with the data subject (booking fulfilment). FareHarbor is subject to GDPR.
Respond.io	Outside South Africa (Hong Kong-based, GDPR compliant)	Customer communication data: names, contact details, message content from all channels (email, WhatsApp, Facebook, Instagram, TikTok)	Necessary for performance of contract and legitimate business operations. Respond.io is GDPR compliant, has appointed EU and UK GDPR representatives, uses EU Standard Contractual Clauses for

Operator	Country	Data Transferred	Basis
			third-country transfers, and publishes a Data Protection Addendum. ISO 27001 certified.
Brevo	Outside South Africa (EU)	Customer email marketing data: names, email addresses, communication history	Necessary for direct marketing communications and customer relationship management. Brevo is subject to GDPR.

9.5 Security Measures

Trains Planes and Automobiles Pty Ltd t/a Atlantic Rail takes appropriate technical and organisational measures to secure the personal information it holds, including:

- Password-protected access to all systems and platforms
- Restricted access to personal information on a need-to-know basis
- Secure email communications via Google Workspace and cPanel
- Regular staff training on POPIA obligations
- Data Processing Agreements with all third-party operators
- An Incident Response Policy governing the response to personal information breaches
- Physical security measures at business premises

10. REQUEST PROCEDURE FOR OBTAINING INFORMATION

Access to records held by Trains Planes and Automobiles Pty Ltd t/a Atlantic Rail may be accessed by request only once the prerequisites for access have been met.

10.1 Prerequisites for Access

- The requester must be a natural person or juristic person.
- The requester must require the record for the exercise or protection of any right.
- The requester must comply with all procedural requirements in PAIA.

10.2 How to Submit a Request

The requester must complete the prescribed Form 2 (attached as Annexure B) and submit it, together with payment of the request fee (if applicable), to the Information Officer at the postal or physical address, or email address listed in Section 4 of this manual.

The completed Form 2 must contain sufficient particulars to at least enable the Information Officer to identify:

- The record or records requested;
- The identity of the requester;
- Which form of access is required, if the request is granted; and
- The postal address, fax number or email address of the requester.

Trains Planes and Automobiles Pty Ltd t/a Atlantic Rail will process the request within 30 days of receipt, unless extended in accordance with PAIA.

10.3 Response

The requester shall be informed whether access has been granted or denied in the form of Form 3 (Annexure C). Trains Planes and Automobiles Pty Ltd t/a Atlantic Rail will within 30 days of receipt of the request, decide whether to grant or decline the request and give notice with reasons (if required).

The 30 day period may be extended for a further period of not more than 30 days if the request is for a large amount of information, or the request requires a search for information held at another location and the information cannot reasonably be obtained within the original 30 day period. Trains Planes and Automobiles Pty Ltd t/a Atlantic Rail will notify the requester in writing should an extension be sought.

11. FEES

The following fees apply to requests for access to records:

Item	Fee
Request fee (to be paid before processing)	R50.00
Reproduction fee — printed copy per A4 page (black and white)	R1.10 per page
Reproduction fee — printed copy per A4 page (colour)	R2.50 per page
Reproduction fee — electronic copy (per megabyte)	R2.50 per MB
Postage	Actual postal costs
Access fee — search time per hour (or part thereof)	R30.00 per hour
Deposit (where search time exceeds 6 hours)	One third of access fee in advance

Note: A requester whose financial circumstances do not allow payment of the request fee may apply for exemption by submitting a written request to the Information Officer together with an affidavit or affirmation confirming the financial circumstances.

12. GROUNDS FOR REFUSAL OF ACCESS TO INFORMATION

The main grounds for Trains Planes and Automobiles Pty Ltd t/a Atlantic Rail to refuse a request for information relate to:

- Mandatory protection of the privacy of a third party that is a natural person that would involve the unreasonable disclosure of personal information of that natural person;
- Mandatory protection of the commercial information of a third party, including trade secrets, financial or commercial information whose disclosure could harm the third party's interests, or information disclosed in confidence;
- Mandatory protection of confidential information of third parties if protected by agreement;
- Mandatory protection of records that would be regarded as privileged in legal proceedings;
- The commercial activities of Trains Planes and Automobiles Pty Ltd t/a Atlantic Rail, including trade secrets, financial information, or information that could place the company at a disadvantage in commercial competition;
- The research information of Trains Planes and Automobiles Pty Ltd t/a Atlantic Rail or a third party, if disclosure would identify the researcher or subject matter and place the research at a serious disadvantage;
- Requests that are clearly frivolous or vexatious, or which would involve an unreasonable diversion of resources.

13. DECISION AND AVAILABILITY OF MANUAL

Trains Planes and Automobiles Pty Ltd t/a Atlantic Rail will within 30 days of receipt of the request, decide whether to grant or decline the request and give notice with reasons (if required) to that effect.

The requester shall be informed whether access has been granted or denied in the form of Form 3 (Annexure C).

Availability of the Manual

The manual of Trains Planes and Automobiles Pty Ltd t/a Atlantic Rail is available at the registered premises of Trains Planes and Automobiles Pty Ltd t/a Atlantic Rail as well as on the company website at www.ceresrail.co.za.

Form 02 (Request for Access to Record) and Form 03 (Outcome of Request and Fees Payable) are each available as separate downloadable links on the company website.

Signed by:  _____

Name: Daniel Botha

Title: Managing Director

Date: 16/04/2026

ANNEXURE A: INFORMATION REGULATOR CONTACT DETAILS

Name:

The Information Regulator (South Africa)

Physical Address:

JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001

Postal Address:

P.O. Box 31533, Braamfontein, Johannesburg, 2017

Tel:

(010) 023 5200

Website:

<https://infoeregulator.org.za>

Email:

infoereg@justice.gov.za

eServices Portal:

<https://eservices.infoeregulator.org.za>

Note: Form 02 (Request for Access to Record) and Form 03 (Outcome of Request and Fees Payable) are prescribed government forms available from the Information Regulator's website. Before using these forms, confirm they are the current versions from <https://infoeregulator.org.za>.

ANNEXURE B: FORM 2 — REQUEST FOR ACCESS TO RECORD

(See separately attached government prescribed Form 02)

ANNEXURE C: FORM 3 — OUTCOME OF REQUEST AND FEES PAYABLE

(See separately attached government prescribed Form 03)