



# GREATER AFRICA

— TRAVEL —

## PRIVACY POLICY

### Greater Africa Travel (Pty) Ltd

**Effective date:** 18/12/2024

Greater Africa Travel (Pty) Ltd respects your privacy and is committed to protecting your personal information in accordance with the Protection of Personal Information Act 4 of 2013 (“POPIA”), the Promotion of Access to Information Act 2 of 2000 (“PAIA”), applicable South African law, and recognised website privacy and data-protection practices.

This Privacy Policy explains how we collect, use, store, share and protect personal information when you visit our website, contact us, request a quotation, make a booking, subscribe to marketing communications, interact with our online content, or use our travel-related services.

By using our website, submitting an enquiry, requesting a quotation, making a booking, providing personal information to us, or communicating with us, you acknowledge that you have read and understood this Privacy Policy.

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## 1. Who We Are

Greater Africa Travel (Pty) Ltd is a South African travel company based in Cape Town, South Africa. We provide travel services, holiday itineraries, safari arrangements, travel experiences and related services within Africa, the Indian Ocean Islands and other destinations connected to our clients’ travel arrangements.

For the purposes of POPIA, Greater Africa Travel (Pty) Ltd is the “Responsible Party” in respect of personal information that we determine the purpose and means of processing.

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## 2. Contact Details

For questions about this Privacy Policy, requests relating to your personal information, or PAIA/POPIA enquiries, you may contact:

Email: [accounts@greaterafricatravel.com](mailto:accounts@greaterafricatravel.com)

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### **3. What Information We Collect**

Depending on how you interact with us, we may collect and process the following categories of personal information:

#### **3.1 Personal and identity information**

This may include, but not limited to:

- full names and surnames
- date of birth
- age
- gender
- nationality
- ID number
- passport number
- passport details
- visa information
- travel-document information
- marital status, where relevant to a booking
- information relating to minors travelling with you, where required for travel arrangements

#### **3.2 Contact information**

This may include, but not limited to:

- email address
- telephone number
- mobile number
- physical address
- postal address
- emergency contact details

#### **3.3 Travel and booking information**

This may include, but not limited to:

- travel dates

- destination preferences
- itinerary details
- accommodation preferences
- rooming requirements
- dietary requirements
- special requests
- flight details
- transfer details
- activity preferences
- travel history relevant to your booking
- loyalty, frequent-flyer or travel membership details, where provided

### **3.4 Health, medical and accessibility information**

Where relevant to your travel arrangements, we may collect:

- medical conditions disclosed by you
- allergies
- dietary restrictions
- mobility requirements
- accessibility needs
- pregnancy-related travel information
- medication requirements
- fitness-to-travel information
- vaccination or health-document information required by a destination, airline, supplier or authority

We will only process this type of information where necessary for your travel arrangements, where you have provided it voluntarily, where you have consented, or where the law allows or requires us to do so.

### **3.5 Payment and financial information**

This may include, but not limited to:

- billing information
- payment status
- invoice details
- transaction references
- bank account details, where applicable
- proof of payment
- refund-related information

We do not intend to store full payment-card details on our website unless this is specifically disclosed at the point of collection and processed through a secure payment provider.

### **3.6 Website, device and usage information**

When you use our website, we may collect certain technical information, including:

- IP address
- browser type
- device type
- operating system
- approximate location
- pages visited
- time spent on the website
- referral source
- website interactions
- cookies and similar tracking technologies

### **3.7 Marketing and communication information**

This may include, but not limited to:

- newsletter subscription preferences
- marketing consent records
- enquiry forms
- correspondence
- feedback
- reviews
- survey responses
- communication preferences
- records of opt-in and opt-out requests

### **3.8 Business, supplier and service-provider information**

Where we deal with companies, agents, suppliers, service providers or other juristic persons, we may collect:

- names of contact persons
- business contact details
- company registration details
- VAT numbers
- physical and postal addresses
- banking details

- tax-related information
  - authorised signatory details
  - contractual information
  - commercial correspondence
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#### **4. How We Collect Personal Information**

We may collect personal information:

- directly from you when you contact us, complete a form, request a quotation, make a booking, pay an invoice, subscribe to communications, or communicate with us;
- from a Booking Party, travel agent, tour operator, representative, family member or employer acting on your behalf;
- from suppliers and service providers involved in your travel arrangements;
- from airlines, lodges, hotels, transfer companies, guides, activity providers, insurers and ground handlers;
- from our website, cookies, analytics tools and online advertising technologies;
- from publicly available sources, where lawful and relevant;
- from regulatory bodies, government authorities or legal processes, where required.

If you provide personal information about another person, including a spouse, child, family member, employee, traveller or guest, you confirm that you are authorised to provide that information and that you have made the person aware of this Privacy Policy.

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#### **5. Why We Process Personal Information**

We process personal information for specific, lawful and legitimate travel, business and operational purposes, including to:

- respond to enquiries
- prepare quotations and travel proposals
- design itineraries
- confirm reservations and bookings
- arrange accommodation, flights, transfers, activities, permits and related services
- communicate with clients, travellers, agents and suppliers
- manage payments, invoices, refunds and accounting records
- provide travel documents, vouchers and confirmations

- comply with supplier requirements
  - comply with airline, border, immigration, customs, health and destination requirements
  - assist with emergencies, disruptions, cancellations, amendments and travel support
  - manage insurance-related or incident-related information where applicable
  - provide customer service
  - improve our website, services and client experience
  - send marketing communications, where permitted
  - manage competitions, promotions or surveys, where applicable
  - detect and prevent fraud, misuse, security threats or unlawful activity
  - comply with legal, tax, accounting, regulatory and reporting obligations
  - protect our rights, property, clients, suppliers and business interests
  - respond to lawful requests from regulators, authorities, courts or law-enforcement bodies
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## **6. Legal Basis for Processing**

We process personal information where one or more of the following grounds apply:

- you have given consent;
- processing is necessary to perform a contract with you or to take steps at your request before entering into a contract;
- processing is necessary to comply with a legal obligation;
- processing protects your legitimate interests or the legitimate interests of another person;
- processing is necessary for our legitimate business interests, provided those interests do not unlawfully override your rights;
- processing is permitted by POPIA or other applicable law.

You may withdraw consent where we rely on consent. Withdrawal of consent will not affect processing that occurred before withdrawal, and may affect our ability to provide certain services. By withdrawing consent after proposals, confirmation, quotation, any payments made, will result in certain services being impacted. Information is needed for travel to commence.

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## **7. Special Personal Information and Children's Information**

Some travel arrangements may require us to process special personal information, including health, medical, biometric, religious dietary, or similar sensitive information. We will only process this information where necessary for your travel arrangements, where you have provided it voluntarily, where you have consented, where the processing is required by law, or where POPIA allows it.

Where we process personal information of children, we will do so only with appropriate authorisation from a parent, guardian or competent person, or where otherwise permitted by law. Information relating to children may be required for bookings, flights, accommodation, border requirements, travel with minors, medical needs, child policies and supplier restrictions.

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## **8. Who We Share Personal Information With**

We may share personal information with third parties where necessary for the purposes described in this Privacy Policy. These third parties may include:

- hotels, lodges, camps, villas and accommodation providers
- airlines, air-charter operators and ticketing providers
- transfer companies and transport providers
- vehicle rental companies
- guides, activity providers and excursion operators
- restaurants and special-experience providers
- travel agents, tour operators and destination management companies
- ground handlers and local representatives
- national parks, conservation authorities and permit offices
- visa, immigration, border, customs and government authorities
- payment providers, banks and financial institutions
- auditors, accountants, tax advisors, legal advisors and insurers
- IT, hosting, software, CRM, email, cloud-storage and cybersecurity providers
- marketing, advertising and analytics providers
- debt-collection or fraud-prevention service providers, where applicable
- regulators, courts, law-enforcement bodies and public authorities where required by law.

We require service providers to process personal information only for authorised purposes and to apply appropriate confidentiality and security safeguards.

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## **9. International Transfers of Personal Information**

Because travel arrangements often involve destinations, suppliers and service providers outside South Africa, we may need to transfer personal information outside South Africa.

This may include transfers to suppliers, accommodation providers, airlines, ground handlers, destination management companies, government authorities, emergency providers, technology providers or cloud-service providers located in other countries.

Where personal information is transferred outside South Africa, we will take reasonable steps to ensure that the transfer complies with POPIA. This may include ensuring that:

- the recipient is subject to privacy laws, binding corporate rules or contractual obligations that provide adequate protection;
- the transfer is necessary for the performance of a contract or implementation of pre-contractual measures;
- the transfer is necessary for your travel arrangements;
- you have consented to the transfer;
- another lawful basis under POPIA applies.

You acknowledge that some destination countries may not have data-protection laws equivalent to South African law, but that such transfers may be necessary to arrange and deliver your travel services.

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## **10. Website Cookies and Similar Technologies**

Our website may use cookies, pixels, tags, scripts, local storage and similar technologies to operate the website, improve functionality, measure performance, understand visitor behaviour and support marketing.

Cookies may be used to, but not limited to:

- keep the website functioning correctly;
- remember preferences;
- analyse website traffic;
- understand how visitors use our website;
- improve website performance;
- measure marketing campaigns;
- support remarketing or advertising, where used;

- help prevent fraud or misuse.

You can manage cookies through your browser settings or, where available, through our cookie consent tool. If you block certain cookies, some parts of the website may not function properly.

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## **11. Google Analytics, Google Ads and Other Google Services**

Our website may use Google services such as Google Analytics, Google Tag Manager, Google Ads, Google Search Console, Google Maps, YouTube embeds, reCAPTCHA or similar Google tools.

These services may use cookies or similar technologies to collect information such as, but not limited to:

- pages visited;
- time spent on pages;
- device and browser information;
- approximate geographic location;
- referral source;
- website interactions;
- conversion activity;
- advertising or measurement identifiers, where applicable.

We use this information to understand website performance, improve our content, measure advertising effectiveness and provide more relevant information to users.

Where legally required, we will request consent before using non-essential analytics, advertising or remarketing cookies.

We do not intentionally send personally identifiable information such as names, email addresses, phone numbers, ID numbers, passport numbers or payment details to Google Analytics.

Google may process information in accordance with its own privacy policies and product terms. You can learn more about how Google uses information from sites or apps that use its services by visiting Google's privacy and business data responsibility resources.

You may also be able to control or opt out of certain Google advertising and analytics features through your Google account settings, browser settings, cookie settings or available Google opt-out tools.

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## **12. Marketing Communications**

We may send you marketing communications about travel offers, destinations, newsletters, updates, promotions or services where:

- you have consented;
- you are an existing client and the communication relates to similar services;
- the law otherwise allows us to do so.

You may opt out of marketing communications at any time by using the unsubscribe link in our emails, contacting us directly, or following the opt-out instructions provided in the communication.

We will not sell your personal information to third parties for their own independent marketing purposes.

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## **13. Security of Personal Information**

We take reasonable, appropriate technical and organisational measures to protect personal information against loss, damage, unauthorised access, unauthorised disclosure, unlawful processing or misuse.

Our safeguards may include, but not limited to:

- password-protected systems;
- restricted access to personal information;
- locked storage for physical records;
- firewalls;
- anti-virus protection;
- encrypted servers or encrypted communication tools where appropriate;
- secure business premises;
- access control;
- staff training;

- supplier and service-provider controls;
- vulnerability assessments and reviews of digital infrastructure;
- ongoing assessment of security measures.

No method of electronic transmission or storage is completely secure. Although we take reasonable steps to protect personal information, we cannot guarantee absolute security.

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#### **14. Retention of Personal Information**

We retain personal information only for as long as reasonably necessary for the purposes for which it was collected, unless a longer retention period is required or permitted by law.

We may retain personal information for purposes such as, but not limited to:

- completing travel arrangements;
- providing client support;
- accounting, tax and audit requirements;
- legal and regulatory compliance;
- recordkeeping;
- dispute resolution;
- fraud prevention;
- insurance or incident-related purposes;
- proof of bookings, instructions, consent or transactions.

When personal information is no longer required, we will securely delete, destroy, de-identify or archive it in accordance with applicable law and our internal retention practices.

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#### **15. Your Rights**

Subject to POPIA and other applicable law, you have the right to:

- ask whether we hold personal information about you;
- request access to your personal information;

- request correction or updating of inaccurate, irrelevant, excessive, outdated, incomplete or misleading personal information;
- request deletion or destruction of personal information where legally permitted;
- object to certain processing of your personal information;
- withdraw consent where processing is based on consent;
- object to direct marketing;
- request information about third parties who have had access to your personal information, where applicable;
- lodge a complaint with the Information Regulator.

We may require proof of identity before processing a request. Some requests may be subject to lawful limitations, including where we are required to retain information by law, where the information is needed for legal claims, or where access may affect the rights of another person.

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## **16. Access to Records Under PAIA**

Requests for access to records held by Greater Africa Travel may be made in accordance with PAIA and our PAIA and POPIA Manual.

A requester may be required to complete the prescribed PAIA request form and pay the prescribed fees, where applicable. Requests must contain enough detail to identify the record requested, the requester, the form of access required, and the right the requester wishes to exercise or protect.

PAIA requests may be sent to our Information Officer using the contact details provided in this Privacy Policy.

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## **17. Accuracy of Information**

You are responsible for ensuring that personal information you provide to us is accurate, complete and up to date.

This is particularly important for travel arrangements, including names as reflected in passports, dates of birth, passport details, visa information, medical information, dietary requirements and emergency contact details.

Greater Africa Travel will not be responsible for losses, delays, denied boarding, denied entry, incorrect bookings, penalties, additional costs or failed services arising from incorrect, incomplete or outdated information provided to us.

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## **18. Third-Party Websites and Links**

Our website may contain links to third-party websites, booking platforms, payment platforms, social media pages, supplier websites, maps, videos or external content.

We are not responsible for the privacy practices, security or content of third-party websites. You should review the privacy policies of those third parties before providing personal information to them.

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## **19. Social Media and Public Content**

If you interact with us on social media platforms, your personal information may also be processed by the relevant social media platform according to its own terms and privacy policy.

If you tag us, comment publicly, leave a review, submit photos, or provide testimonials, we may interact with or share that content where appropriate and lawful. We will obtain consent where required for promotional use of identifiable images, testimonials or personal content.

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## **20. Data Breaches**

If we become aware of a security compromise involving personal information, we will take reasonable steps to assess, contain and address the incident.

Where required by law, we will notify the Information Regulator and affected data subjects as soon as reasonably possible, taking into account the nature of the compromise and applicable legal requirements.

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## **21. Complaints**

If you believe that your personal information has been processed unlawfully or that your privacy rights have been infringed, please contact us first so that we can attempt to resolve the matter.

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## **22. Changes to This Privacy Policy**

We may update this Privacy Policy from time to time to reflect changes in our business, website, services, legal requirements, supplier requirements or data-processing practices.

The latest version will be published on our website. The effective date at the top of this Privacy Policy will indicate when it was last updated.

Continued use of our website or services after an update means that you acknowledge the updated Privacy Policy.

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### **23. Acceptance**

By using our website, submitting personal information to us, requesting a quotation, confirming a booking, subscribing to communications, or continuing to interact with Greater Africa Travel, you acknowledge that you have read and understood this Privacy Policy.