



Singapore Airlines Limited

PAIA MANUAL

**Prepared in terms of section 51 of the
Promotion of Access to Information Act
2 of 2000 (as amended)**

DATE OF COMPILATION: 01 March 2024

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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; and |
| 1.8 | “Republic” | Republic of South Africa |

2. PURPOSE OF PAIA MANUAL

The purpose of this PAIA Manual is for the public to-

- 2.1 check the categories of records held by Singapore Airlines Limited¹ (**the 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;

¹ A Private Body as defined in PAIA “private body’ means-[...](c) any former or existing juristic person, but excludes a public body;”

- 2.4 access all the relevant contact details of the IO 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,² and the purpose of processing personal information;
- 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.

² POPIA defines “personal information” as information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person, including, but not limited to— (a) information relating to the race, gender, sex, pregnancy, marital status, national, ethnic or social origin, colour, sexual orientation, age, physical or mental health, well-being, disability, religion, conscience, belief, culture, language and birth of the person; (b) information relating to the education or the medical, financial, criminal or employment history of the person; (c) any identifying number, symbol, e-mail address, physical address, telephone number, location information, online identifier or other particular assignment to the person; (d) the biometric information of the person; (e) the personal opinions, views or preferences of the person; (f) correspondence sent by the person that is implicitly or explicitly of a private or confidential nature or further correspondence that would reveal the contents of the original correspondence; (g) the views or opinions of another individual about the person; and (h) the name of the person if it appears with other personal information relating to the person or if the disclosure of the name itself would reveal information about the person;

3. KEY CONTACT DETAILS FOR ACCESS TO INFORMATION OF SINGAPORE AIRLINES LIMITED

3.1. Information Officer

Name: Dale Woodhouse
Tel: +27 82 786 8188
Email: dale_woodhouse@singaporeair.com.sg

3.2. Deputy Information Officer

Name: Minhua Mak
Tel: +27 11 880 8560
Email: Minhua_Mak@singaporeair.com.sg
Fax number: NA

3.3 Access to information: general contacts

Email: DPO@singaporeair.com.sg

3.4 National or Head Office

Postal Address: SIA
Stonewedge Office Park
1 Wedgewood link Road
Bryanston
Sandton
South Africa
2021.

Physical Address: SIA
Stonewedge Office Park
1 Wedgewood link Road
Bryanston
Sandton
South Africa
2021

Telephone: +27 11 880 8560

Email: DPO@singaporeair.com.sg

Website: <https://www.singaporeair.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-

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 IO of every public body, and

4.3.2.2. every DIO of every public and private body designated in terms of section 17(1) of PAIA and section 56 of POPIA.

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 of PAIA; and
- 4.3.3.2. access to a record of a private body contemplated in section 50 of PAIA;
- 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. 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 IO 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;
- 4.3.7. 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;
- 4.3.8. 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;
- 4.3.9. the notices issued in terms of sections 22 and 54 of PAIA regarding fees to be paid in relation to requests for access; and
- 4.3.10. the regulations made in terms of section 92 of PAIA.

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 IO;

4.5.2. in all official languages of South Africa from the website of the Regulator (Documents | Information Regulator SA (justice.gov.za)).

4.6 A copy of the Guide is also available at the Head Office of the Body as set out in clause 3.4 above, in the following two official languages, for public inspection, during normal office hours-

4.6.1 English

4.6.2 Afrikaans

5. CATEGORIES OF RECORDS OF SINGAPORE AIRLINES LIMITED WHICH ARE AVAILABLE WITHOUT A PERSON HAVING TO REQUEST ACCESS

5.1. The following records are available to the public without a request in terms of PAIA:

5.1.1. Records maintained at the Companies and Intellectual Property Commission (CIPC);

5.1.2. Public relations brochures and publications;

5.1.3. Media releases;

5.1.4. Records of a public nature, typically those disclosed on SIA's website and in its various annual reports, may be accessed without the need to submit a formal application; and

5.1.5. Other non-confidential records, such as statutory records maintained at CIPC, may also be accessed without the need to submit a formal application. However,

please note that an appointment to view such records will also have to be made with the Information Officer.

5.2. The following records concerning a personnel member's employment or contract with Singapore Airlines Limited are available to the employee or contractor without a request in terms of PAIA:

- 5.2.1. Personnel records of an administrative nature;
- 5.2.2. Records of disciplinary hearings and related matters; and
- 5.2.3. The company's policies and procedures manuals.
- 5.2.4. To view any records other than those available on our website or held at the CIPC, you must make an appointment with our IO.

6. DESCRIPTION OF THE RECORDS OF SINGAPORE AIRLINES LIMITED WHICH ARE AVAILABLE IN ACCORDANCE WITH ANY OTHER LEGISLATION

- Air Services Licensing Act 115 of 1990
- Basic Conditions of Employment Act,75 of 1997
- Broad-based Black Economic Empowerment Act 53 of 2003
- Civil Aviation Act 13 of 2009
- Companies Act 71 of 2008
- Compensation for Occupational Injuries and Diseases Act
- Competition Act of 1998
- Constitution of the Republic of South Africa;
- Consumer Protection Act 68 of 2008;
- Debt Collectors Act 114 of 1998
- Employment Equity Act 55 of 1998
- Financial Advisory and Intermediary Services Act 37 of 2002
- Financial Intelligence Centre 38 of 2001
- Financial Services Board Act 97 of 1990
- Income Tax Act 58 of 1962
- Intellectual Property Act 28 of 2013
- International Air Services Act 60 of 1993
- Labour Relations Act 66 of 1995
- Long-Term Insurance Act 52 of 1998
- National Credit Act 34 of 2005
- National Energy Act 34 of 2008

- Pension Funds Act 24 of 1956
- Prescription Act 68 of 1969
- Promotion of Access to information Act 2 of 2000
- Protection of Personal Information Act 4 of 2013
- Short Term Insurance Act 53 of 1998
- Value Added Tax Act 89 of 1991.

7. DESCRIPTION OF THE SUBJECTS ON WHICH THE BODY HOLDS RECORDS AND CATEGORIES OF RECORDS HELD ON EACH SUBJECT BY SINGAPORE AIRLINES LIMITED

7.1. Administration

- Licences
- Air operator certificates

7.2. Constitution

- List of directors
- Minute books and resolutions
- Share register
- Shareholder's agreements
- Statutory registers

7.3. Documents relating to legal proceedings

7.4. Human resources

- HR policies and procedures
- Advertised posts
- Employees records
- Employment equity plan
- Employee manuals

7.5. Incorporating documents

- Incorporation forms
- Memorandum of incorporation

7.6. Personnel and related records

- Personnel information, employment histories and health records
- Personal records provided to Singapore Airlines Limited by its personnel
- Records which a third party has provided to Singapore Airlines Limited about any of its personnel
- Training and development
- Conditions of employment and other personnel-related contractual and legal records
- Internal evaluation records
- Other internal records and correspondence

7.7. Customer records

- Records about a customer provided by a customer or a third party
- Records generated by Singapore Airlines Limited relating to customers, including transactional records
- Records listed in our Privacy Policy which is reproduced below, and also available on our Privacy Policy page linked [here](#) (see section 1. The types of Customer Data we collect), as updated from time to time.
 - Personal Data. The data we collect includes but is not limited to:
 - (i) personal information that can be used to identify an individual, such as name, gender, date of birth, nationality, passport or other personal identification numbers;
 - (ii) contact information, such as mailing address, phone number, email address;
 - (iii) payment information, such as credit or debit card information, including the name of cardholder, card number, billing address and expiry date;
 - (iv) travel information, such as ticket numbers, destinations, flight information;
 - (v) information on your other activity and purchases made through SIA (such as chargeable seats, excess baggage, seat upgrades), our website or mobile applications (such as hotel accommodation, car rentals and insurance), and purchases of packages such as the Singapore Stopover Holiday and other linked travel arrangements;
 - (vi) your customer preferences, such as dietary, seating, entertainment viewed, information on your KrisShop purchases

- (including the transaction dates, channel in which purchase was made, KrisFlyer miles accrued) and membership details (including membership tier and membership tier qualification status), places that you would like to visit or other service preferences;
- (vii) information about your in-flight WiFi usage, such as whether you use in-flight WiFi, what WiFi plan you used, the mode of payment to pay for in-flight WiFi and how much data was utilised for your WiFi sessions;
 - (viii) information about your in-flight interactions with our staff, such as types of beverages requested or other in-flight requests and preferences;
 - (ix) information about your interactions with our ground staff, such as the details of any complaint cases, incidences of lost baggage, call details, and other information relevant to assist our ground staff to service you;
 - (x) health information, such as vaccination status, pre-departure test results, doctors' notes, medical certificates and letters and requests related to medical conditions;
 - (xi) information you choose and/or consent to submit when you use features on our website, mobile applications, or other online facilities, including, but not limited to
 - information in the queries you enter into our chatbot, Kris, on our global Facebook page, website and mobile application;
 - audio clips and images you submit to us via the "Capture and Discover" tool to provide travel recommendations
 - audio clips or text you submit when using the Translation Assistant, and
 - your location information.
 - (xii) information we receive from flight bookings made via our online corporate booking platform;
 - (xiii) information we receive from other sources e.g. our page on social media websites and our contractual partners; and
 - (xiv) business contact information, such as the contact details of the employees of our vendors and corporate customers, as well as

the contact details collected by our divisions including the Cargo Division and Engineering Division.

- Technical Data. This includes device and technical information you give us when using our website or mobile application, such as IP addresses or other unique identifiers, cookies, mobile carrier, time zone setting, operating system and platform, and information about your customer journey on the website or mobile application. Information on cookies may be found in our [cookie policy](#). Please note that in limited circumstances, this Technical Data may be linked with your Personal Data in order to identify you.

7.8. Supplier records

- Records about a supplier provided by the supplier or a third party
- Records generated by Singapore Airlines Limited relating to suppliers, including transactional records

7.9. Planning records

- Annual Reports
- Strategic Plan
- Annual Performance Plan
- Proposals

7.10. Singapore Airlines Limited records

- Financial records
- Operational 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
- Records held by officials of the company

7.11. Internal correspondence

- Product records
- Statutory records
- Internal policies and procedures

7.12. Third party records

- Records held by Singapore Airlines Limited pertaining to other parties, including financial records, correspondence, contractual records, records provided by third parties, and records which third parties have provided about their contractors or suppliers.

8. PROCESSING OF PERSONAL INFORMATION

8.1 Purpose of Processing Personal Information

8.1.1 The Body uses personal information under its care in the following ways:

8.1.1.1 Rendering services according to contractual agreements;

8.1.1.2 Marketing and advertising;

8.1.1.3 Administration;

8.1.1.4 Staff administration;

8.1.1.5 Recruitment;

- 8.1.1.6. Security purposes;
- 8.1.1.7. Keeping accounts and records;
- 8.1.1.8. Compliance with tax laws / fulfilling its statutory obligations in terms of applicable legislation;
- 8.1.1.9. Historical record keeping / recording statistics necessary to fulfil Singapore Airlines Limited business objectives; and
- 8.1.1.10. In accordance with our Privacy Policy , see excerpt reproduced below, and also available on our Privacy Policy page linked [here](#) (see section 3. How we use your Customer Data), as updated from time to time.

In accordance with our contract of carriage with you, we will use the Customer Data to:

- process and assist you with any transactions related to your booking (e.g., making a booking, providing services related to the booking (e.g., seat selection, accommodation, insurance, etc.), fulfilling such booking and investigating potential fraudulent transactions);
- notify you about changes to our service, including through flight alert messages via our mobile services facility;
- facilitate airport, internet check-in and self check-in;
- provide airport services such as processing information relating to connecting flights, arrangements at airports and customs and immigration facilities;
- provide baggage related services such as processing of any baggage related queries, including mishandled or missing baggage claims; and
- provide in-flight catering and other services (e.g. to provide you with a personalised inflight experience);

- in accordance with our contract with you as a KrisFlyer member or Registered Customer, we will use the Customer Data to:
 - i. maintain your account;
 - ii. facilitate your transactions and services;
 - iii. enable you to log in using your account on any of the platforms hosted by us; and
 - iv. Send you updates and other account related information.

As a KrisFlyer member, Customer Data will be used to administer your KrisPay programme and mobile application.

As it is in our legitimate interests to be responsive to you, to provide customised services and marketing, to ensure the success of our business and to ensure the proper functioning of our products, services and organisation, we will use your Customer Data to:

- improve our website and mobile application and to ensure content from the website and mobile application is presented in the most effective manner for you and your device;
- administer the website and mobile application, and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- monitor and record calls for quality, training, legal compliance, analysis and other related purposes in order to pursue our legitimate interest of improving service delivery;
- send you surveys by email (including surveys related to our Registered Customer, KrisFlyer or HighFlyer programmes, if you are a member, as detailed below). You can opt-out of receiving these surveys at any time by contacting us;

- send you service emails, such as reminders when you have not checked out your purchases on our website or mobile application.
- respond to your enquiries, requests or feedback;
- enforce our terms, conditions and policies;
- allow you to participate in interactive features of the website and mobile application, when you choose to do so;
- customise our products and services to you, including by responding to and catering for your customer preferences;
- personalise the content you see on our website, mobile application and inflight entertainment systems, including by enabling you to save your preferences on our inflight entertainment systems and suggesting content for your next flight;
- keep the website and mobile application safe and secure;
- aggregate Customer Data into anonymised statistical data (such as number of passengers flown on a particular journey), which we will use for statistical analysis so that we can better understand our customers' profile and improve our service offering;
- to customise our marketing e.g. sending you targeted marketing on places you would like to visit, based on your responses to optional questions on our website and mobile application, and your prior travels.
- share the Customer Data with selected partners to enable them to better tailor offers, promotions and other direct marketing to you.
- participate in industry studies conducted by public agencies or regulatory authorities in Singapore; and

In relation to our KrisFlyer and Registered Customer programmes, we will use your Customer Data to:

- i. provide you with any information including promotions and offers from us and other KrisFlyer

- programme partners, where applicable (with your consent where required by applicable laws);
- ii. deliver programme-related benefits including, but not limited to, automatically enrolling you in lucky draw promotions;
- iii. contact you regarding product and customer related surveys and market research; and
- iv. respond to your email and call enquiries;

Further, as a KrisFlyer member, Customer Data will be used to provide services to celebrate special occasions; sending you KrisFlyer-related news and KrisFlyer e-statements and associated promotions and offers (with your consent where required by applicable laws).

If you are a participating company under the HighFlyer programme or under our Corporate Travel Programme (“**Participating Company**”) and if you are a Corporate Travel Manager (“**CTM**”) or Assistant Corporate Travel Manager (“**ACTM**”), we will use the Customer Data to:

- i. maintain the Participating Company’s HighFlyer account
- ii. facilitate Participating Company-related transactions and services;
- iii. market and communicate to the CTMs and ACTMs information on SIA and HighFlyer promotions, contests, events and lucky draws, including those conducted by HighFlyer program partners (with your consent where required by applicable laws);
- iv. contact the CTMs and ACTMs regarding product and customer related surveys and market research;
- v. respond to email and call enquiries from the CTMs and ACTMs; and

- vi. Send the CTMs and ACTMs programme information updates and other account related information.

If you are a Participating Company under the HighFlyer programme or under our Corporate Travel Programme and if you are a Corporate Traveller (“CT”), we will use the Customer Data to:

- i. maintain your travel records in the Participating Company’s HighFlyer account;
- ii. facilitate Participating Company-related transactions and services;
- iii. contact the CTs regarding product and customer related surveys and market research; and
- iv. respond to email and call enquiries from the CTs.

If you are an employee of an entity with a contractual relationship with us:

- i. to contact you to perform our services, and in particular, to monitor and record calls for quality, training, legal compliance, analysis and other related purposes in order to pursue our legitimate interest to improve service delivery;
- ii. enforce our terms and conditions against your employer; and
- iii. communicate with you about products, services, promotions, events and other news and information we think will be of interest to you.

With your consent where required by applicable laws, we will use your Customer Data to:

- send you marketing and promotional materials in relation to products and services offered by us, our subsidiaries and affiliated airlines and service partners (such as accommodation partners or transportation partners), as

well as our appointed agents, in relation to the Registered Customer, KrisFlyer and HighFlyer programmes;

- retarget you with advertisements (including adverts from the SIA Group) across multiple websites you visit, leveraging the cookies we have in place. The effect of this is that where you go to a different website after visiting the SIA website, you may see tailored SIA Group advertisements on these websites. Please see our cookie policy for more information on our use of cookies (and similar technologies).
- retarget you with SIA advertisements across multiple websites you visit, leveraging the cookies other SIA Group companies have in place on your device. The effect of this is that where you go to a different website after visiting the relevant SIA Group company website, you may see tailored SIA advertisements on these websites. We only do this where you have consented to the relevant SIA Group company sharing your cookie information with us for these purposes. Please see our cookie policy for more information on our use of cookies (and similar technologies).
- serve you with customised advertising from the SIA Group that is relevant to you on social media platforms. We use audience targeting technologies to do this. For example, we may display interest-based advertising to you when you are using Facebook through a tool offered by Facebook called the Custom Audience tool. This tool allows email addresses to be hashed locally on our browser and then sent to Facebook. There, the email addresses are matched against Facebook's existing list of Facebook users' hashed IDs and the matches are added to our Custom Audience for advertising. The matched and unmatched hashes are then deleted; and
- register you for the Registered Customer and KrisFlyer programmes.

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
Customers / Clients	<p>Nature of the personal information processed in respect of the categories of data subjects, includes, in relation to:</p> <ul style="list-style-type: none"> - Natural persons: name, gender, medical information, biometric information, pregnancy, marital status, race, age, date of birth, language, education information, financial information, employment history, identity number, physical and postal addresses, contact details, criminal behaviour, disability, personal opinions, views, views and opinions of another individual about the data subject. - Juristic persons / entities: names of contact persons, name of legal entity, physical and postal addresses, contact details, registration number, founding documents, tax related information, authorised signatories and financial information. - Service providers: names of contact persons, name of legal entity, physical and postal addresses, contact details, registration number, founding documents, tax related information, authorised signatories, and financial information.
Service Providers and Suppliers	
Existing and former employees and job applicants	
Directors and officers of Singapore Airlines Limited	
Shareholders	

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

8.3.1 Singapore Airlines Limited may supply personal information to the following recipients:

8.3.1.1. Within Singapore Airlines globally;

8.3.1.2. Regulatory, statutory and government bodies;

8.3.1.3. Service providers;

8.3.1.4. Suppliers;

8.3.1.5. Customers;

8.3.1.6. Professional advisors;

8.3.1.7. Employees of Singapore Airlines Limited;

8.3.1.8. Shareholders and other stakeholders;

8.3.1.9. A potential acquirer of Singapore Airlines Limited or any of its divisions as part of a due diligence process; and

8.3.1.10. Banks and other financial institutions.

Disclosures will be made subject to applicable law. We require all third parties to respect the security of your personal data and to treat it in accordance with the law.

8.4 Planned trans-border flows of personal information

8.4.1 The Body intends to transfer personal information, subject to applicable law, to third parties in other countries who provide us with data hosting

services on foreign cloud-based servers. We require such third parties to adhere to applicable law in respect of such cross-border transfer of personal information, and to respect the security of your personal information and to treat it in accordance with the applicable law.

8.4.2 As an international organisation, we may sometimes have to send personal information to other countries for the purposes of fulfilling our contractual obligations or to meet business needs. If this is the case, we require that all third parties undertake to protect your personal information in accordance with the same standards that we do.

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

8.5.1 The Body has established and maintains appropriate, reasonable technical and organisational measures to ensure the integrity of personal information in its care and control, and to ensure that such personal information is protected against unauthorised or unlawful processing, accidental loss, destruction or damage, alteration or access by having regard to the requirements of POPIA.

9. AVAILABILITY OF THE MANUAL

9.1 A copy of the Manual is available-

9.1.1 on SIA's website at <https://www.singaporeair.com>;

9.1.2 at the national South African head office of Singapore Airlines Limited (as cited in clause 3.4) 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 Regulator upon request.

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

The IO will update this manual on a regular basis.

Issued by

Mr. Dale Woodhouse
General Manager Central & South Africa