

ALLIANZ COMMERCIAL

PAIA Information Manual

Prepared in accordance with Section 51 of the Promotion of Access to Information Act (Act 2 of 2000)

Content

1	Introduction	3
2	Contact details and general information	4
3	South African Human Rights Guide	4
4	Record types that may be requested	5
5	Processing of Personal Information ("PI")	8
6	Grounds for refusal of access to records	11
7	Records that cannot be found or do not exist	12
8	Request procedure	13
9	Fees	13
10	Right of appeal	13
11	Availability of Manual	14
12	Annexsure A	15
13	Annexure B	18

1 Introduction

The Promotion of Access to Information Act, No 2 of 2000 ("PAIA") gives effect to the Constitutional right to request access to information in records held by public or private bodies that is required for the exercise or protection of any rights. PAIA sets out the requisite procedural issues attached to such request, the requirements which such request must meet as well as the grounds for refusal or partial refusal of such request.

PAIA recognizes that the right of access to information cannot be unlimited and should be subject to justifiable limitations, including but not limited to limitations aimed at reasonable protection of privacy and commercial confidentiality.

Allianz Global Corporate & Specialty SA Limited ("the Company" / "AGCS SA") has compiled this Manual to comply with the provisions of PAIA and the Protection of Personal Information Act, 2013 ("POPIA") and to ensure that members of the public have effective access to information in AGCS SA's possession which will assist them in exercising and protecting their rights. Where information requested is not immediately available, AGCS SA will endeavour to make it available in a timely manner insofar as that is reasonably practicable in the circumstances.

This Manual sets out the procedure to be followed to facilitate a request to access to information as well as the following information:

- Purpose of the processing of Personal Information ("PI");
- Description of the categories of data subjects and of the information or categories of information relating thereto;
- The recipients or categories of recipients to whom PI may be supplied;
- Planned transborder flows of PI;
- A general description of the security measures implemented by AGCS SA to ensure the confidentiality, integrity and availability of the information which is to be processed.

This Manual is available for inspection, free of charge, at the offices of AGCS SA (see details below)

2 Contact details and general information

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3 South African Human Rights Guide

The South African Human Rights Commission (SAHRC) has compiled the guide contemplated in Section 10 of PAIA, which contains such information as may reasonably be required by a person who wishes to exercise any right contemplated in PAIA.

Copies of PAIA and POPIA, the relevant regulations and guides to these acts, can be obtained from the SAHRC or the Information Regulator and queries should be directed to:

South African Human Rights Commission

Department	Promotion of Access to Information Act Unit Research and Documentation Department
Telephone	(011) 877 3600
Address	Private Bag 2700, Houghton, Johannesburg, 2041
Email	info@sahrc.org.za
Website	www.sahrc.org.za

Information regulator

Telephone	(010) 023 5200
Postal Address	P.O Box 3153, Braamfontein, Johannesburg, 2017
Physical Address	JD House, 27 Stiemens Street, Braamfontein, Johannesburg 2001
General enquiry email	enquiries@inforegulator.org.za
Complaint by email	(together with the complete POPIA/PAIA form 5) PAIAComplaints@inforegulator.org.za and POPIAComplaints@inforegulator.org.za
Website	https://inforegulator.org.za/

4 Record types that may be requested

4.1 Personnel Records

"Personnel" refers to any person who works for or provides services to or on behalf of and who receives or is entitled to receive remuneration, and any other person who assists in carrying out or conducting AGCS SA's business and includes, without limitation, directors (executive and non- executive), all permanent, temporary and part-time staff as well as contract workers. Employees do not need to use the PAIA/POPIA process to obtain such records. Personnel records include:

- 4.1.1 personal records (provided by personnel themselves);
- 4.1.2 records provided by a third party relating to personnel;
- 4.1.3 conditions of employment and other personnel-related contractual and quasi-legal records;
- 4.1.4 internal evaluation records and other internal records;
- 4.1.5 correspondence relating to personnel;
- 4.1.6 training schedules and material;
- 4.1.7 employment policies and procedures;
- 4.1.8 payroll records;
- 4.1.9 disciplinary and performance records;
- 4.1.10 registrations with Department of Labour, Unemployment Insurance Fund, Compensation Fund and in terms of the Skills Development Levies Act, 1998;
- 4.1.11 records of Unemployment Insurance Fund contributions;
- 4.1.12 records regarding benefit schemes;
- 4.1.13 health and safety records; and
- 4.1.14 workplace skills plans

4.2 Customer records

A "customer" refers to any natural or juristic entity that receives services from AGCS SA. Customer records include:

- 4.2.1 records pertaining to products sold and/or serviced by AGCS SA namely Insurance products;
- 4.2.2 records provided by a customer to a third party acting for or on behalf of AGCS SA;
- 4.2.3 records provided by a third party;
- 4.2.4 records generated by or within AGCS SA relating to its customers, including transactional data;
- 4.2.5 policy documents.

4.3 Private body records

These are records which include, but are not limited to, records which pertain to AGCS SA's own affairs including:

- 4.3.1 financial records;
- 4.3.2 operational records;
- 4.3.3 databases;
- 4.3.4 information technology systems and documents;
- 4.3.5 marketing records;
- 4.3.6 internal correspondence;
- 4.3.7 product records;
- 4.3.8 statutory records;
- 4.3.9 internal policies and procedures;
- 4.3.10 Supervisory body-related records;
- 4.3.11 Securities and equities;
- 4.3.12 Records held by officials of the group;
- 4.3.13 product records;
- 4.3.14 accounting records;
- 4.3.15 taxation records;
- 4.3.16 agreements and contracts;
- 4.3.17 administration, secretarial and legal records;
- 4.3.18 records of litigation / arbitration proceedings;
- 4.3.19 insurance policies and records; and
- 4.3.20 records pertaining to health and safety and the environment.

4.4 Other party records

- 4.4.1 Personnel, customer or private body records which are held by another party on AGCS SA's behalf, as opposed to the records held by AGCS SA itself.
- 4.4.2 Records held by AGCS SA pertaining to other parties, including without limitation, financial records, correspondence, contractual records, and records about AGCS SA's contractors / suppliers / service providers.

4.5 Records available in terms of other legislation

Records are available from AGCS SA in terms of the following legislation:

- 4.5.1 Administration of Estates Act 66 of 1965
- 4.5.2 Basic Conditions of Employment Act 75 of 1997
- 4.5.3 Companies Act 71 of 2008
- 4.5.4 Compensation of Occupational Injuries and Diseases Act 130 of 1993
- 4.5.5 Competition Act 89 of 1998
- 4.5.6 Copyright Act 98 of 1978
- 4.5.7 Electronic Communications and Transaction Act 25 of 2002
- 4.5.8 Employment Equity Act 55 of 1998
- 4.5.9 Financial Advisory and Intermediary Services Act 37 of 2002
- 4.5.10 Financial Intelligence Centre Act 38 of 2001
- 4.5.11 Income Tax Act 58 of 1991
- 4.5.12 Insurance Act, 63 of 2001;
- 4.5.13 Labour Relations Act 66 of 1995
- 4.5.14 Occupational Health and Safety Act, 85 of 1993;
- 4.5.15 Pension Funds Act, 24 of 1956;
- 4.5.16 Protected Disclosures Act, 26 of 2000;
- 4.5.17 Protection of Personal Information Act, 4 of 2013;
- 4.5.18 Prevention of Organised Crime Act 121 of 1998
- 4.5.19 Promotion of Access to Information Act 25 of 2000
- 4.5.20 Protection of Constitutional Democracy against Terrorist and Related Activities Act 33 of 2004
- 4.5.21 Skills Development Act, 97 of 1998;
- 4.5.22 Skills Development Levies Act, 9 of 1999;
- 4.5.23 Unemployment Insurance Act, 63 of 2001;
- 4.5.24 Unemployment Insurance Contributions Act, 4 of 2002;
- 4.5.25 Value-added Tax Act

4.6 Information automatically available

The following categories of records are automatically available for inspection, purchase or photocopying. Request forms for these categories of information are also available from our Information Officer, whose contact details appear herein:

- 4.6.1 General information pertaining to AGCS SA and /or Allianz
- 4.6.2 Services information and brochures;
- 4.6.3 Newsletters

5 Processing of Personal Information ("PI")

AGCS SA takes the privacy and protection of PI very seriously and will only process PI in accordance with the current South African privacy legislation (POPIA) or any other applicable legislation which deals with privacy rights. Accordingly, the relevant PI privacy conditions and requirements relating to the processing thereof (including, but not limited to, the collection, handling, transfer, sharing, correction, storage, archiving and deletion of personal information) will be applied to any PI processed by the group. For further information please refer to our Privacy Notice: https://commercial.allianz.com/global-offices/africa/data-privacy.html

5.1 Conditions for lawful processing

Chapter 3 of POPIA sets out the conditions for lawful processing of PI (as defined in POPIA) which must be complied with when a responsible party such as AGCS SA processes the personal information of natural persons and juristic persons.

5.2 The purpose for AGCS SA processing personal information:

AGCS SA processes PI for a variety of purposes, where legally justified to do so.

5.3 Categories of data subjects and PI processed:

- 5.3.1 Customers including potential and previous customers
 - Customer personal/special PI, e.g. name, identity number (ID), race, etc.
 - Customer's products
 - Surveillance records
 - Customer contracts
 - Customer location information
 - Customer third-party information, such as from credit bureaux and the Companies and Intellectual Property Commission (CIPC).

5.3.2 Supplier personal information

- Supplier contracts
- Supplier bank details
- Biometric information of supplier representatives
- PI of supplier representatives

5.3.3 Employees (prospective, previous and existing employees)

- Employee PI (e.g. name, ID, etc.)
- Employee education and psychometrics records
- Employee medical information
- Employee disability information
- Employee biometric information
- Employee pension and provident fund information
- Employee bank details
- Employee tax and financial information
- Employee contracts
- Employee beneficiary information
- Employee vehicle registration
- Employee performance records
- Payroll records
- Electronic access records
- Physical access records

- Surveillance records
- Health and safety records
- Training records
- · Background checks
- · Criminal checks
- · Employment history

5.3.4 Job Applicants

- Curriculum vitae and application forms
- Criminal checks
- Background checks

5.3.5 Family members of employees

- PI e.g. name, ID, etc.
- · Medical and disability information
- · PI acquired for processing travel documents

5.3.6 Children of employees

- Child's PI processed e.g. birth certificate, ID, etc.
- · Child's medical information and disability information
- · Child's information acquired for processing travel documents

5.3.7 Visitors

- Physical access records
- Electronic access records, scans and photographs
- Surveillance records (like CCTV footage)
- · Biometric information

5.4 Recipients or categories with whom PI is shared

- 5.4.1 AGCS SA may share the PI of its data subjects, where legally justified to do so, for any of the purposes outlined herein with the following parties (among others):
 - other Allianz group companies in other countries; and
 - AGCS SA's service providers, operators (suppliers and third parties) who perform services on its behalf including but not limited to various vendors and suppliers, medical aid and pension fund providers, insurers and reinsurers, third party administrators.
- 5.4.2 AGCS SA does not share the PI of its data subjects with any third parties, except if:
 - it is obliged to provide such information for legal or regulatory purposes;
 - it is required to do so for purposes of existing or future legal proceedings;
 - it is selling one or more of its businesses or part of its businesses to a third party to whom it may transfer its rights under any agreement it may have with data subjects;
 - it is involved in the prevention of fraud, loss, bribery or corruption;
 - the third party performs services and processes PI on the AGCS SA's behalf as its operator;
 - this is required to provide or manage any information, products and/or services to data subjects;
 - this is needed to help AGCS SA improve the quality of its products and services.

- 5.4.3 AGCS SA will send its data subjects appropriate notifications or communications of its processing if it is obliged to do so by law, or in terms of its contractual relationship with data subjects.
- 5.4.4 AGCS SA will only disclose PI to government authorities if it is required to do so by law.
- 5.4.5 AGCS SA's employees and suppliers are required to adhere to legislation relating to privacy and confidentiality principles and to complete privacy training.

5.5 Information security measures to protect personal information:

- 5.5.1 Reasonable technical and organisational measures have been implemented for the protection of PI processed by AGCS SA and its operators (suppliers and third parties). In terms of POPIA, operators (suppliers and third parties) process PI on behalf of the AGCS SA.
- 5.5.2 AGCS SA continuously implements and monitors technical and organisational security measures to protect the PI it holds, against unauthorised access, as well as accidental or wilful manipulation, loss, damage, or destruction.
- 5.5.3 AGCS SA will take steps to ensure that operators (suppliers and third parties) that process PI on its behalf apply adequate safeguards as outlined herein.

5.6 Cross-border flows of personal information:

- 5.6.1 AGCS SA will only transfer PI across South African borders if the relevant transactions or situation requires cross-border processing. It will only do so in accordance with South African legislative requirements, or if the data subject consents to the transfer of their PI to third parties in foreign countries.
- 5.6.2 AGCS SA will take steps to ensure that operators (suppliers and third parties) that process PI in jurisdictions outside of South Africa, apply adequate safeguards as outlined in herein.
- 5.6.3 AGCS SA will take steps to ensure that operators (suppliers and third parties) in foreign countries are bound by laws, binding corporate rules or binding agreements that provide an adequate level of protection of PI and uphold principles for reasonable and lawful processing of personal information.
- 5.6.4 Whenever AGCS SA transfers PI for processing outside of South Africa by another Allianz Group company, it will do so on the basis of Allianz' approved binding corporate rules known as the Allianz Privacy Standard (Allianz' BCR) which establish adequate protection for personal data and are legally binding on all Allianz Group companies. Allianz' BCR and the list of Allianz Group companies that comply with them can be accessed under www.allianz.com.

5.7 PI Received from third parties

When AGCS SA receives PI from a third party on behalf of a data subject, it requires confirmation that the third party has a lawful justification in terms of section 11 of POPIA, to share such information.

5.8 Data subject participation

A data subject is entitled to request a responsible party to confirm whether or not it holds personal information about the data subject, and to request the record itself or a description of the record, subject to the requirements in PAIA. A data subject may also request a responsible party to correct or delete personal information that is inaccurate, irrelevant, excessive, out of date, incomplete, misleading, obtained unlawfully, or to destroy or delete personal information that a responsible party is no longer authorised to retain. Such an application can be submitted via our Information Officer. For the relevant form please follow the link Home - Information Regulator (inforegulator.org.za)

5.9 Objection to the processing of personal information by a data subject

- 5.9.1 Section 11(3) of POPIA and Regulation 2 of the POPIA Regulations provides that a data subject may object to processing in the prescribed form found here where the processing is based on one of the Home Information Regulator (inforegulator.org.za) following grounds, unless legislation provides for such processing:
- 5.9.2 processing protects a legitimate interest of the data subject;
- 5.9.3 processing is necessary for the proper performance of a public law duty by a public body;
- 5.9.4 processing is necessary for pursuing the legitimate interests of the responsible party or of a third party to whom it is supplied;
- 5.9.5 processing is for purposes of direct marketing other than direct marketing by means of unsolicited electronic
- 5.9.6 communications as referred to in section 69 of POPIA.

5.10 Request for correction or deletion of Personal Information

Section 24 of POPIA and Regulation 3 of the POPIA Regulations provides that a data subject may request for its personal information to be corrected/deleted in the prescribed form attached to this Manual.

6 Grounds for refusal of access to records

AGCS SA may refuse a request for information on, inter alia, the following basis:

- **6.1** The mandatory protection of the privacy of a third party who is a natural person, in order to avoid the unreasonable disclosure of personal information concerning that natural person (including a deceased individual).
- **6.2** The mandatory protection of the commercial information of a third party, if the record contains:
- 6.2.1 trade secrets of that third party;
- 6.2.2 financial, commercial, scientific or technical information, other than trade secrets, of a third party, the disclosure of which would be likely to cause harm to the commercial or financial interests of that third party;
- 6.2.3 information supplied in confidence by a third party, the disclosure of which could reasonably be expected:
 - to put that third party at a disadvantage in contractual or other negotiations;
 - to prejudice that third party in commercial competition.
- 6.2.4 the mandatory protection of confidential information of third parties if disclosure would constitute an action for breach of a duty of confidence owed to that third party in terms of an agreement;
- **6.3** the mandatory protection of the safety of individuals and the protection of property.
- **6.4** the mandatory protection of records which would be privileged from production in legal proceedings.
- **6.5** the protection of AGCS SA's commercial activities including, without limitation, records that contain:
- 6.5.1 AGCS SA's trade secrets;
- 6.5.2 financial, commercial, customer, scientific or technical information, the disclosure of which would be likely to cause harm to AGCS SA's commercial or financial interests;
- 6.5.3 information, the disclosure of which could reasonably be expected:
 - to put AGCS SA at a disadvantage in contractual or other negotiations; or
 - to prejudice AGCS SA in commercial competition.

- 6.5.4 computer programs owned by AGCS SA.
- 6.6 the mandatory protection of research information of AGCS SA or a third party, if disclosure would expose the identity of AGCS SA or the third party, the researcher or the subject matter of the research to serious disadvantage.
- **6.7** requests for information that are, in the opinion of AGCS SA, frivolous or vexatious or which involve an unreasonable diversion of resources.

Section 70 of PAIA contains an overriding provision. Disclosure of a record that has been requested is compulsory if it would reveal a substantial contravention of, or failure to comply with the law, or imminent and serious public safety or environmental risk and the public interest in the disclosure of the record clearly outweighs the harm contemplated by its disclosure.

7 Records that cannot be found or do not exist

In terms of chapter 3 of Section 55 of the PAIA, AGCS SA will after all reasonable steps have been taken to find the record requested, notify the requester that the records does not exist.

8 Request procedure

- **8.1** A request must comply with all the procedural requirements as contained in section 53 of PAIA relating to a request for access to a record. A requester requiring access to information held by AGCS SA must make the request in the prescribed form and submit the request, together with the prescribed fee and deposit, if applicable, to the Head of Legal and Compliance at the postal or physical address above.
- **8.2** The application form must be completed in full in accordance with the instructions thereon and must be accompanied by payment or proof of payment of the prescribed fees payable.
- **8.3** All requests for access to records in terms of PAIA must be in writing.
- 8.4 The requester will be informed within 30 (thirty) days of receipt of the request whether the request has been granted or not, unless the request for access is of such a nature that an extension of the prescribed time limit is necessitated in accordance with section 57 of PAIA. In the case of an extension of the time limit, the requester has the right to lodge a complaint with the Information Regulator in accordance with section 57(3)(c) of PAIA by following the process and completing the form prescribed by POPIA. The requester may also make an application with a court against the extension.
- 8.5 It is important to note that access to information is not guaranteed the requester must identify the right she/he is seeking to protect and explain why the record requested is required for the exercise or protection of that right. The request for access form must be completed with enough particularity to at least enable the Information Officer to identify the following:
- 8.5.1 The record/s requested;
- 8.5.2 The identity of the requester;
- 8.5.3 The form of access that is required, if the request is granted;
- 8.5.4 The postal address or fax number of the requester; and
- 8.5.5 The right that the requester is seeking to protect and an explanation as to why the record is necessary to exercise or protect such a right.
- 8.6 If the requester's interest does affect a third party then AGCS SA will first need to inform the third party within 21 days of receiving the request and the third party will have 21 days to make representations and/or submissions regarding the granting of access to the record. If the Information Officer does decide to grant access to the record after considering these submissions, the third party that has been affected has 30 days in which to appeal the decision in the High Court or to lodge a complaint with the Information Regulator in accordance with section 74 of POPIA in the prescribed form. If no appeal or complaint is lodged within 30 days, the requester must be granted access to the Record

9 Fees

- **9.1** The Act provides for two types of fees, namely;
- 9.1.1 **Request fee:** This is a non- refundable administration fee paid by all requestors with the exclusion of personal requestors. It is paid before the request is considered;
- 9.1.2 Access fee: This is paid by all requestors only when access is granted. This fee is intended to reimburse the private body for the costs involved in searching for a record and preparing it for delivery to the requestor.
- **9.2** AGCS SA may withhold a record until the request fee and the deposit (if applicable) has been paid. A schedule of the prescribed fees is attached as Annexure B to the manual.

10 Right of appeal

AGCS SA does not have an appeal process. As such, the decision made by the Information Officer is final, and requestors will have to exercise such external remedies at their disposal if the request for information is refused and the requestor is not satisfied with the answer supplied by the Information Officer.

- **10.1** Subject to the provisions of PAIA, a requestor that is dissatisfied with an information Officer's refusal to disclose information, may within 180 days of notification of the decision, apply to a court or to the Information Regulator for relief.
- **10.2** Likewise, a third party dissatisfied with an Information Officer's decision to grant a request for information, apply to the Information Regulator or to a court with appropriate jurisdiction for relief
- **10.3** The requester may also approach the Information Regulator and lodge a complaint in accordance with section 74 of POPIA in the prescribed form against the access fee to be paid or the form of access granted. The details of the Information Regulator are set out above.

11 Availability of Manual

This manual will be available on AGCS SA's website and may be amended from time to time. Alternatively, a copy can be requested from the Head of Legal and Compliance for AGCS SA.

12 Annexsure A

Application form - prescribed form to be completed by a requester

Request for access to records of a private body

Full name and surname

Identity number

(Section 53(1) of the Promotion of Access to Information Act, 2000 (Act No 2 of 2000) (Regulation 4) The Information

-	The Head		
P	Particulars of person requesting access to the record		
a b c	Furnish an address and/or fax number in the Republic to which information must be sent.		
ı	Full name and surname		
I	dentity number		
Ī	Postal Address		
	Telephone number		
ı	E-mail address		

4 Particulars of record:

- a. Provide full particulars of the record to which access is requested, including the reference number if that is known to you, to enable the record to be located.
- b. If the provided space is inadequate please continue on a separate folio and attach it to this form. The requester must sign all the additional folios.

Description of record or relevant part of the record
Reference number, if available:
Any further particulars of record
Fees
 a. A request for access to a record other than a record containing personal information about Yourself will be processed only after a request fee has been paid b. You will be notified of the amount required to be paid as the request fee. c. The fee payable for access to a record depends on the form in which access is required and the reasonable time required to search for and prepare a record. d. If you qualify for exemption of the payment of any fee, please state the reason therefore.
Reason for exemption from payment of fees
Form of access to record
If you are prevented by a disability to read, view or listen to the record in the form of access provided for in to 4 hereunder, state your disability and indicate in which form the record is required.
Disability
Form in which record is required: Mark the appropriate box with an "X"
 Notes: a. Your indication as to the required form of access depends on the form in which the record is available b. Access in the form requested may be refused in certain circumstances. In such a case you will be informed if access will be granted in another form. c. The fee payable for access to the record, if any, will be determined partly by the form in which access is requested.
1. If the record is in written or printed form: Copy of record Inspection of record
2. If record consists of visual images:

☐ View the images☐ Copy of the images

5

6

	☐ Transcription of the images
	 3. If record consists of recorded words or information which can be reproduced in sound: Listen to the soundtrack (audio cassette) Transcription of soundtrack (written or printed document)
	 4. If record is held on computer or in an electronic or machine-readable form: Printed copy of record Printed copy of information derived from the record Copy in computer readable form (stiffy or compact disc) *If you requested a copy or transcription of a record (above), do you wish the copy or transcription to be posted to you?
	Yes ☐ No ☐ If yes, a postal fee is payable.
7	Particulars of right to be exercised or protected.
	If the provided space is inadequate please continue on a separate folio and attach it to this form. The requester must sign all the additional folios.
	Indicate which right is to be exercised or protected:
	
	Explain why the requested record is required for the exercising or protection of the aforementioned right:
В	Notice of decision regarding request for access:
	You will be notified in writing whether your request has been approved /denied. If you wish to be informed thereof in another manner, please specify the manner and provide the necessary particulars to enable compliance with your request.
	How would you prefer to be informed of the decision regarding your request for access to the record?
S	igned at this day of 20
c	ignature of requester/ person on behalf of requester
J	griatare of requester/ person on benait of requester

13 Annexure B

Table of fees

Reproduction Fees

Where AGCS SA has voluntarily provided the Minister with a list of categories of records that will automatically be made available to any person requesting access thereto, the only charge that may be levied for obtaining such records, will be a fee for reproduction of the record in question.

For every photocopy of an A4-size page or part thereof	R1.10
For every printed copy of an A4-size page or part thereof held on a computer or in electronic or machine-readable form	R0.75
For a copy in a computer-readable form on	R70.00
For a transcription of visual images, for an A4-size page or part thereof For a copy of visual images	R40.00 R60.00
For a transcription of an audio record, for an A6-size page or part thereof For a copy of an audio record	R20.00 R30.00

Request Fees

The request fee payable by a requester, other than a personal requester, referred to in regulation 7(2) is R50.00.

Access Fees

The access fees payable by a requester referred to in regulation 7(3) are as follows:

For every photocopy of an A4-size page or part thereof	R1.10
For every printed copy of an A4-size page or part thereof held on a computer or in electronic or machine-readable form	R0.75
For a copy in a computer-readable form on	R70.00
For a transcription of visual images, for an A4-size page or part thereof For a copy of visual images	R40.00 R60.00
For a transcription of an audio record, for an A6-size page or part thereof For a copy of an audio record	R20.00 R30.00

To search for and prepare the record for disclosure R30, 00 for each hour or part of an hour reasonably required for such search and preparation.

The actual postage is payable when a copy of a record must be posted to a requester.