



# **INFORMATION PAIA MANUAL OF IDM HOLDINGS ( PAIA MANUAL)**

**Promotion of Access to Information Act (PAIA) MANUAL**

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

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## 1. ABOUT THIS MANUAL

If you need access to information, this manual will provide you with the necessary contact details and procedures to ask us for that information. It provides a clear overview of the structure, functions, services, and index of information we hold to help identify where the required information could be. It also provides the forms you need to complete and sets out the fees you may need to pay before assisting you.

This manual applies to **The IDM Group** and its subsidiaries:

- IDM Holdings (Pty) Ltd, registration number: 2008/016916/07
- New IDM Holdings (RF) (Pty) Ltd, registration number: 2022/716762/07
- Debt Matters (Pty) Ltd, registration number: 2007/026552/07
- IDM Protect (Pty) Ltd, registration number: 2007/015303/07
- Just Money (Pty) Ltd, registration number: 2007/012821/07
- Intelligent Debt Management (Pty) Ltd, registration number: 2004/031355/07
- Consumer Debt Matters (Pty) Ltd, registration number: 2011/136077/07
- IDM Motor & Home (Pty) Ltd, registration number: 2019/588488/07
- Intelligent Credit Management Services (Pty) Ltd, registration number: 2023/607808/07

## 2. OUR DETAILS

Name: IDM Holdings  
Address: Mutual Park, Jan Smuts Drive, Pinelands, Cape Town, 7450  
Contact details: +27 21 481 1700  
Email address: [info@intelligentdebtgroup.co.za](mailto:info@intelligentdebtgroup.co.za)

### 3. INFORMATION OFFICER AND DEPUTY INFORMATION OFFICER(S)

Our information officer and deputy information officer(s) will tend to your PAIA request.

#### 3.1. Information Officer

Name and surname	Mark Finlayson
Postal Address	Mutual Park, Jan Smuts Drive, Pinelands, Cape Town, 7450
Physical Address	Mutual Park, Jan Smuts Drive, Pinelands, Cape Town, 7450
Phone	021 481 1700
E-mail	Mark.Finlayson@idmgroup.co.za
Entity	<b>IDM Holdings (Pty) Ltd</b>

#### 3.1.1. Deputy Information Officer

Name and surname	James O'Haughey
Postal Address	Mutual Park, Jan Smuts Drive, Pinelands, Cape Town, 7450
Physical Address	Mutual Park, Jan Smuts Drive, Pinelands, Cape Town, 7450
Phone	021 481 1700
E-mail	James.O'Haughey@idmgroup.co.za
Entity	<b>IDM Holdings (Pty) Ltd</b>

#### 3.2. Information Officer

Name and surname	Mark Finlayson
Postal Address	Mutual Park, Jan Smuts Drive, Pinelands, Cape Town, 7450
Physical Address	Mutual Park, Jan Smuts Drive, Pinelands, Cape Town, 7450
Phone	021 481 1700
E-mail	Mark.Finlayson@idmgroup.co.za
Entity	<b>New IDM Holdings (RF) (Pty) Ltd</b>

### 3.2.1. Deputy Information Officer

Name and surname	James O'Haughey
Postal Address	Mutual Park, Jan Smuts Drive, Pinelands, Cape Town, 7450
Physical Address	Mutual Park, Jan Smuts Drive, Pinelands, Cape Town, 7450
Phone	021 481 1700
E-mail	James.O'Haughey@idmgroup.co.za
Entity	<b>New IDM Holdings (RF) (Pty) Ltd</b>

### 3.3. Information Officer

Name and surname	Gary Light
Postal Address	Mutual Park, Jan Smuts Drive, Pinelands, Cape Town, 7450
Physical Address	Mutual Park, Jan Smuts Drive, Pinelands, Cape Town, 7450
Phone	021 481 1700
E-mail	Gary.Light@idmgroup.co.za
Entity	<b>Debt Matters (Pty) Ltd</b>

### 3.4. Information Officer

Name and surname	Gary Light
Postal Address	Mutual Park, Jan Smuts Drive, Pinelands, Cape Town, 7450
Physical Address	Mutual Park, Jan Smuts Drive, Pinelands, Cape Town, 7450
Phone	021 481 1700
E-mail	Gary.Light@idmgroup.co.za
Entity	<b>Consumer Debt Matters (Pty) Ltd</b>

### 3.5. Information Officer

Name and surname	Bridget Gishen
Postal Address	Mutual Park, Jan Smuts Drive, Pinelands, Cape Town, 7450
Physical Address	Mutual Park, Jan Smuts Drive, Pinelands, Cape Town, 7450
Phone	021 481 1700
Email	Bridget.Gishen@idmgroup.co.za
Entity	<b>IDM Protect (Pty) Ltd</b>

#### 3.5.1. Deputy Information Officer

Name and surname	Tiaan Wilsnach
Postal Address	Mutual Park, Jan Smuts Drive, Pinelands, Cape Town, 7450
Physical Address	Mutual Park, Jan Smuts Drive, Pinelands, Cape Town, 7450
Phone	021 481 1700
E-mail	Tiaan.Wilsnach@idmgroup.co.za
Entity	<b>IDM Protect (Pty) Ltd</b>

### 3.6. Information Officer

Name and surname	Bridget Gishen
Postal Address	Mutual Park, Jan Smuts Drive, Pinelands, Cape Town, 7450
Physical Address	Mutual Park, Jan Smuts Drive, Pinelands, Cape Town, 7450
Phone	021 481 1700
Email	Bridget.Gishen@idmgroup.co.za
Entity	<b>Just Money (Pty) Ltd</b>

### 3.6.1. Deputy Information Officer

Name and surname	Tiaan Wilsnach
Postal Address	Mutual Park, Jan Smuts Drive, Pinelands, Cape Town, 7450
Physical Address	Mutual Park, Jan Smuts Drive, Pinelands, Cape Town, 7450
Phone	021 481 1700
E-mail	Tiaan.Wilsnach@idmgroup.co.za
Entity	<b>Just Money (Pty) Ltd</b>

### 3.7. Information Officer

Name and surname	James O'Haughey
Postal Address	Mutual Park, Jan Smuts Drive, Pinelands, Cape Town, 7450
Physical Address	Mutual Park, Jan Smuts Drive, Pinelands, Cape Town, 7450
Phone	021 481 1700
E-mail	James.O'Haughey@idmgroup.co.za
Entity	<b>Intelligent Debt Management (Pty) Ltd</b>

### 3.8. Information Officer

Name and surname	Johan van Tonder
Postal Address	1 <sup>st</sup> Floor East Block, Centennial Place, Century City, 7441
Physical Address	1 <sup>st</sup> Floor East Block, Centennial Place, Century City, 7441
Phone	021 524 4330
Email	johanvt@regalhouse.co.za
Entity	<b>IDM Motor &amp; Home (Pty) Ltd</b>

### 3.9. Information Officer

Name and surname	Bridget Gishen
Postal Address	Mutual Park, Jan Smuts Drive, Pinelands, Cape Town, 7450
Physical Address	Mutual Park, Jan Smuts Drive, Pinelands, Cape Town, 7450
Phone	021 481 1700
Email	Bridget.Gishen@idmgroup.co.za
Entity	<b>Intelligent Credit Management Services (Pty) Ltd</b>

#### 3.9.1. Deputy Information Officer

Name and surname	Tiaan Wilsnach
Postal Address	Mutual Park, Jan Smuts Drive, Pinelands, Cape Town, 7450
Physical Address	Mutual Park, Jan Smuts Drive, Pinelands, Cape Town, 7450
Phone	021 481 1700
Email	Tiaan.Wilsnach@idmgroup.co.za
Entity	<b>Intelligent Credit Management Services (Pty) Ltd</b>



#### 4. THE INFORMATION AND CATEGORIES OF RECORDS WE HOLD

Here is a description of different subjects about which we have information and the categories of records we hold for each subject, including but is not limited to the following:

Subject	Category of records	Availability
Client records	Name, Surname, ID number, marital status, cellphone, email address, gross income, residential address, bank details, gender, credit report data, information about a client's debt counselling application	Client records are freely available to the client upon request  Third parties are required to provide consent from the client in order to obtain client information
Human resources	Personal records provided to the subsidiaries by an employee/ personnel; Records a third party has provided to the group about its personnel; Conditions of employment and other personnel-related contractual and quasi-legal; Records internal evaluation records; Advertised posts; other internal records and correspondence related to a particular employee; HR policies and procedures	Records should be formally requested in terms of PAIA
Finances	Financial statements, Financial and tax records, Asset register, Management accounts	Records should be formally requested in terms of PAIA

#### 5. PROTECTION OF PERSONAL INFORMATION

Our company uses personal information to deliver our services and make sure our operations run smoothly. You can find more information about how we use personal information in our privacy notices available on our website.

Personal information is any information about an identifiable living individual or an identifiable, existing juristic person.

### 5.1. Categories of data subjects, categories of information, and the purposes for which information is collected and used

Here is a broad description of the categories of data subjects whose information we collect and the categories of information we collect and use:

Categories of data subjects	Categories of information we collect and use	Why we collect and use the information
Clients	Name, Surname, ID number, marital status, cellphone, email address, gross income, residential address, bank details, gender, credit report data	To deliver on services offered by the subsidiaries.
Employees	Name, Surname, ID number, marital status, cellphone, email address, gross income, residential address, bank details, gender, skills training history, internal evaluations	Ongoing Employment purposes Statistical and Historical purposes
Prospective employees	Name, Surname, ID number, marital status, cellphone, email address, residential address, gender, employment history	To consider employment prospects Statistical and Historical purposes
Service providers	Details of entity, business address, employee details where necessary, bank details	For purposes of performing in terms of a mandate/contract

### 5.2. Who receives personal information

We share personal information with:

- Our Service providers
- Our Partners
- Other companies in the group

### 5.3. Cross-border flows of information

We may share personal information with parties that are outside the borders of South Africa.

### 5.4. Information security measures

We have implemented appropriate, reasonable, technical, and organisational measures to secure the integrity and confidentiality of personal information.

## 6. RECORDS THAT ARE AUTOMATICALLY AVAILABLE

The following categories of records are automatically available:

- [Any information available on our public website](#)
- [Register of directors](#)
- [Media releases](#)

## 7. RECORDS AVAILABLE IN TERMS OF OTHER LEGISLATION

The IDM Group and its subsidiaries is required in accordance with legislation to retain certain records. We hold records for the purposes of PAIA in accordance with the following legislation, among others

<b>Name of legislation</b>
<a href="#">National Credit Act 34 of 2005</a>
<a href="#">Basic Conditions of Employment Act 75 of 1997</a>
<a href="#">Income Tax Act 58 of 1962</a>
<a href="#">Unemployment Contributions Act 63 of 2001</a>
<a href="#">Unemployment Insurance Act No. 30 of 1966</a>
<a href="#">Employment Equity Act No. 55 of 1998</a>
<a href="#">Copyright Act No. 98 of 1978</a>
<a href="#">Broad-Based Black Economic Empowerment Act, 2003</a>
<a href="#">Value Added Tax Act No. 89 of 1991</a>
<a href="#">Business Act No. 71 of 1991</a>
<a href="#">Electronic Communications and transactions Act No. 25 of 2002</a>

Companies Act 71 of 2008
Occupational Health and Safety Act No. 85 of 1993
Insolvency Act No. 24 of 1936
Pension Funds Act No. 24 of 1956
Financial Advisory and Intermediary Services Act, 2002 (Act No. 37 of 2002)
Financial Intelligence Act 38 of 2001
Financial Sector Regulation Act 2017
Labour Relations Act 66 of 1995
Skills Development and Levies Act 9 of 1999
Prevention of Organised Crime Act No. 121 of 1998
Prescription Act No. 68 of 1969
Unemployment Insurance Act 63 of 2001
Insurance Act No. 18 of 2017
Promotion of Access to Information Act No. 2 of 2000
Protection of Personal Information Act No. 4 of 2013
Financial Advisory and Intermediary Services Act, 2000 (Act No. 37 of 2002)
Long-term Insurance Act, 1998 (Act No 52 of 1998)
Short-term Insurance Act, 1998 ( Act No 53 Of 1998)

## **8. HOW TO REQUEST ACCESS TO RECORDS**

You can request access to records by completing Form 2 (attached to this manual in Appendix A). If your request does not comply with the formalities in this manual, we will let you know which steps you should take to comply. If you are making a request on behalf of someone else, you must submit reasonable proof of authority.

You must provide us with proof of identity before we can process any request.

## **9. OUTCOME OF YOUR REQUEST AND FEES PAYABLE**

We will decide within 30 days of receiving your request whether to grant or decline the request. We will notify you in writing of our decision and explain why we accepted or refused your request.

If your request is successful, we will let you know what the related fees are and how you can pay them.

We may require that you pay a deposit before we process your request. The fee structure is available on the SAHRC website at [www.sahrc.org.za](http://www.sahrc.org.za)

If you request large quantities of information or if we cannot reasonably obtain the information you request within the original 30 days, we might have to extend the period by another 30 days. We will notify you in writing if we require an extension.

If you do not hear from us within the period stipulated above, it means that we refused your request in terms of section 58 of PAIA.

## **10. REASONS WHY WE MAY REFUSE YOUR REQUEST**

The SAHRC's guide to understanding PAIA sets out all the reasons why an entity may or must refuse a PAIA request.

## **11. IF WE CANNOT FIND A RECORD**

If there are records that we cannot find despite a reasonable and diligent search, we will notify you explaining the measures we have taken to locate the record. If, after we have provided explanation, we find the records, we will grant you access to the records unless we have a reason to refuse your request.

## **12. IF YOU NEED ASSISTANCE OR MORE INFORMATION**

If you require further assistance, the [Information Regulator](#) has published a guide that introduces PAIA, describes where to find information and how to request access to information. It explains when access to information may be refused and may offer key references and resources.

The guide will be available at the head office of the [Information Regulator](#), and may be provided by IDM Holdings to a requestor upon request.

**JD House, 27 Stiemens Street,**

**Braamfontein, Johannesburg, 2001**

Alternatively, it may be found at all the provincial offices and on the Information Regulator website at: <https://inforegulator.org.za/paia-guidelines/>.

# FORMS

Please see below forms you will be required to complete in order to submit a request:

- Form 2: request for access to a record
- Form 3: Outcome of request and fees payable
- Form 5: Lodging of complaint to the Information Regulator (available at: [PAIA Forms](#))

## APPENDIX A: FORM 2 REQUEST FOR ACCESS TO RECORD

**NOTE:**

1. Proof of identity must be attached by the requestor.
2. If requests made on behalf of another person, proof of such authorisation, must be attached to this form.

**TO:** The Information Officer

Address:

E-mail address:

Fax number:

*Mark with an "X"*

Request is made in my own name     Request is made on behalf of another person

PERSONAL INFORMATION	
<b>Full names &amp; surname</b>	
<b>Identity number</b>	
<b>Capacity in which request is being made (<i>when made on behalf of another person</i>)</b>	
<b>Postal address</b>	
<b>Street address</b>	
<b>Fax number</b>	
<b>Telephone/cell phone number</b>	
<b>Email address</b>	
<b>Full names of person on whose behalf request is made (<i>if applicable</i>):</b>	

<b>Identity number</b>	
<b>Postal address</b>	
<b>Street address</b>	
<b>Email address</b>	
<b>Telephone/cell phone number</b>	
<b>PARTICULARS OF RECORD REQUESTED</b>	
<p><i>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. (If the space is inadequate, please continue on a separate page and attach it to this form. All additional pages must be signed).</i></p>	
<b>Description of record or relevant part of the record:</b>	
<b>Reference number, if available:</b>	
<b>Any further particulars of record:</b>	
<b>TYPE OF RECORD</b>	
<i>(Mark the applicable box with an "X")</i>	
<b>Record is in written or printed form</b>	



Record comprises virtual images ( <i>this includes photographs, slides, video recordings, computer-generated images, sketches, etc</i> )	
Record consists of recorded words or information which can be reproduced in sound	
Record is held on a computer or in an electronic, or machine-readable form	
<b>FORM OF ACCESS</b> (Mark the applicable box with an "X")	
Printed copy of record ( <i>including copies of any virtual images, transcriptions and information held on computer or in an electronic or machine-readable form</i> )	
Written or printed transcription of virtual images ( <i>this includes photographs, slides, video recordings, computer-generated images, sketches, etc</i> )	
Transcription of soundtrack ( <i>written or printed document</i> )	
Copy of record on flash drive ( <i>including virtual images and soundtracks</i> )	
Copy of record on compact disc drive ( <i>including virtual images and soundtracks</i> )	
Copy of record saved on cloud storage server	
<b>MANNER OF ACCESS</b> (Mark the applicable box with an "X")	
Personal inspection of record at registered address of public/private body ( <i>including listening to recorded words, information which can be reproduced in sound, or information held on computer or in an electronic or machine-readable form</i> )	
Postal services to postal address	
Postal services to street address	

<b>Courier service to street address</b>	
<b>Facsimile of information in written or printed format <i>(including transcriptions)</i></b>	
<b>Email of information <i>(including soundtracks if possible)</i></b>	
<b>Cloud share/file transfer</b>	
<b>Preferred language</b> <i>(Note that if the record is not available in the language you prefer, access may be granted in the language in which the record is available)</i>	
<b>PARTICUALRS OF THE RIGHT TO BE EXERCISED OR PROTECTED</b> <i>If the provided space is inadequate, please continue on a separate page and attach it to this Form. The requestor must sign all the additional pages.</i>	
<b>Indicate which right is to be exercised or protected</b>	
<b>Explain why the record requested is required for the exercise or protection of the aforementioned right</b>	
<b>FEES</b> <i>a) A request fee must be paid before the request will be considered.</i> <i>b) You will be notified of the amount of the access fee to be paid.</i> <i>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.</i> <i>d) If you qualify for exemption of the payment of any fee, please state the reason for exemption</i>	
<b>Reason</b>	

You will be notified in writing whether your request has been approved or denied and if approved the costs relating to your request, if any. Please indicate your preferred manner of correspondence:

Postal address	Facsimile	Electronic communication <i>(Please specify)</i>

Signed at \_\_\_\_\_ this \_\_\_\_\_ day of \_\_\_\_\_ 20\_\_\_\_\_.

\_\_\_\_\_

**Signature of Requestor / person on whose behalf request is made**

\_\_\_\_\_

**FOR OFFICIAL USE**

<b>Reference number:</b>	
<b>Request received by: (State rank, name and surname of Information Officer)</b>	
<b>Date received:</b>	
<b>Access fees:</b>	
<b>Deposit (if any):</b>	

\_\_\_\_\_

**Signature of Information Officer**

**APPENDIX B: FORM 3 OUTCOME OF REQUEST AND FEES  
PAYABLE**

Note:

1. If your request is granted the—
  - (a) amount of the deposit, (if any), is payable before your request is processed; and
  - (b) requested record/portion of the record will only be released once proof of full payment is received.
2. Please use the reference number hereunder in all future correspondence.

Reference number: \_\_\_\_\_

**TO:**

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

Your request dated \_\_\_\_\_, refers.

**1. You requested:**

Personal inspection of information at registered address of public/private body (including listening to recorded words, information which can be reproduced in sound, or information held on computer or in an electronic or machine-readable form) is free of charge. You are required to make an appointment for the inspection of the information and to bring this Form with you. If you then require any form of reproduction of the information, you will be liable for the fees prescribed in Appendix C.	
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**OR**

**2. You requested:**

Printed copies of the information (including copies of any virtual images, transcriptions and information held on computer or in an electronic or machine-readable form)	
Written or printed transcription of virtual images (this includes photographs, slides, video recordings, computer-generated images, sketches, etc)	

Transcription of soundtrack (written or printed document)	
Copy of information on flash drive (including virtual images and soundtracks)	
Copy of information on compact disc drive (including virtual images and soundtracks)	
Copy of record saved on cloud storage server	

**3. To be submitted:**

Postal services to postal address	
Postal services to street address	
Courier service to street address	
Facsimile of information in written or printed format (including transcriptions)	
E-mail of information (including soundtracks if possible)	
Cloud share/file transfer	
Preferred language: (Note that if the record is not available in the language you prefer, access may be granted in the language in which the record is available).	

Kindly note that your request has been:

**Approved**

**Denied, for the following reasons:**

**4. Fees payable with regards to your request:**

Item	Cost per A4-size page or part thereof/item	Number of pages/items	Total

<b>Photocopy</b>			
<b>Printed copy</b>			
<b>For a copy in a computer-readable form on:</b>			
<b>(i) Flash drive (provided by requestor)</b>	R40.00		
<b>(ii) Compact disc (provided by requestor)</b>	R40.00		
<b>(iii) Compact disc (provided to requestor)</b>	R60.00		
<b>For a transcription of visual images per A4-size page</b>	Service to be outsourced. Will depend on the quotation of the service provider.		
<b>Copy of visual images</b>	Service to be outsourced. Will depend on the quotation of the service provider.		
<b>Transcription of an audio record, per A4-size</b>	R24.00		
<b>Copy of an audio record</b>			
<b>(i) Flash drive (provided by requestor)</b>	R40.00		
<b>(ii) Compact disc (provided by requestor)</b>	R40.00		
<b>(iii) Compact disc (provided to requestor)</b>	R60.00		
<b>Postage, e-mail or any other electronic transfer:</b>	Actual costs		
<b>TOTAL:</b>			

5. Deposit payable (if search exceeds six hours):

Yes

No

<b>Hours of search</b>		<b>Amount of deposit (calculated on one third of total amount per request)</b>	
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The amount must be paid into the following Bank account:

Name of Bank: \_\_\_\_\_

Name of account holder: \_\_\_\_\_

Type of account: \_\_\_\_\_

Account number: \_\_\_\_\_

Branch Code: \_\_\_\_\_

Reference Nr: \_\_\_\_\_

Submit proof of payment to: \_\_\_\_\_

Signed at \_\_\_\_\_ this \_\_\_\_\_ day of \_\_\_\_\_ 20\_\_\_\_\_

Information officer: \_\_\_\_\_

## APPENDIX C: PRESCRIBED FEES IN REQUEST FOR INFORMATION

<b>FEES IN RESPECT OF PRIVATE BODIES</b>		
<b>Item</b>	<b>Description</b>	<b>Amount</b>
1.	The request fee payable by every requester	R140.00
2.	Photocopy/printed black and white copy of A4-size page	R2.00 per page or part thereof.
3.	Printed copy of A4-size page	R2.00 per page or part thereof.
4.	For a copy in a computer-readable form on: <ul style="list-style-type: none"> <li>• Flash drive (to be provided by requester)</li> <li>• Compact disc <ul style="list-style-type: none"> <li>○ if provided to requestor</li> <li>○ if provided by requestor</li> </ul> </li> </ul>	R40.00  R40.00 R60.00
5.	For a transcription of visual images per A4-size page	Service to be outsourced. Will depend on quotation from service provider.
6.	Copy of visual images	
7.	Transcription of an audio record, per A4-size page	R24.00
8.	Copy of an audio record, per A4-size page: <ul style="list-style-type: none"> <li>• Flash drive (to be provided by requester)</li> <li>• Compact disc <ul style="list-style-type: none"> <li>○ if provided to requestor</li> <li>○ if provided by requestor</li> </ul> </li> </ul>	R40.00  R40.00 R60.00
9.	To search for and prepare the record for disclosure for each hour or part of an hour, excluding the first hour, reasonably required for such search and preparation.  To not exceed the cost of	R145.00  R435.00
10.	Deposit: If search exceeds 6 hours	One third of amount per request calculated in terms of items 2 to 8.
11.	Postage, e-mail or any other electronic transfer	Actual expense, if any.