



**INFORMATION MANUAL FOR SCOTTFIN INSURANCE BROKERS (PTY) LTD**

**in terms of**

**THE PROMOTION OF ACCESS TO INFORMATION ACT**

## 1. LIST OF ACRONYMS AND ABBREVIATIONS

1.1	<b>“CEO”</b>	Chief Executive Officer
1.2	<b>“DIO”</b>	Deputy Information Officer;
1.3	<b>“IO”</b>	Information Officer;
1.4	<b>“Minister”</b>	Minister of Justice and Correctional Services;
1.5	<b>“PAIA”</b>	Promotion of Access to Information Act No. 2 of 2000 (as Amended)
1.6	<b>“POPIA”</b>	Protection of Personal Information Act No.4 of 2013;
1.7	<b>“Regulator”</b>	Information Regulator; and
1.8	<b>“Republic”</b>	Republic of South Africa
1.9	<b>“Scottfin”</b>	Scottfin Insurance Brokers Company Registration No. 2013/ 236837/07 FSP no. 3468

## 2. PURPOSE OF PAIA MANUAL

The purpose of this PAIA Manual is to assist you with the following:

- 2.1 Provide you with the categories of records held by Scottfin which are available without you having to submit a formal PAIA request;
- 2.2 Enable you to have a sufficient understanding of how to make a request for access to a record of Scottfin, by providing a description of the subjects on which Scottfin holds records and the categories of records held on each subject;
- 2.3 Provide you with a description of Scottfin’s records which are available in accordance with legislation;
- 2.4 Provide you with access to the relevant contact details of the Information Officer and Deputy Information Officer/s who will assist you with the records you intend on accessing;
- 2.5 Provide you with a description of the guide on how to use PAIA, as updated by the Regulator and how to obtain access to it;
- 2.6 To assist you to understand that where Scottfin processes personal information, the purpose of processing of personal information and the description of the categories of data subjects and of the information or categories of information relating thereto.
- 2.7 Provide you with a description of the categories of data subjects and the information or categories of information relating thereto;
- 2.8 Provide you with the recipients or categories of recipients to whom the personal information may be supplied;
- 2.9 To make you aware of instances where Scottfin 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 To make you aware of appropriate security measures Scottfin has in place to ensure the confidentiality, integrity and availability of the personal information which is to be processed.

### 3. KEY CONTACT DETAILS FOR ACCESS TO INFORMATION ABOUT SCOTTFIN

#### 3.1. Chief Information Officer

Name: Debbie Holroyd  
Tel: 039 978 2220  
Email: debbie@scottfin.com

#### 3.2. Deputy Information Officer

Name: Michelle Penprase  
Tel: 039 978 2220  
Email: michelle@scottfin.com

#### 3.3. Deputy Information Officer

Name: Anki Rossouw  
Tel: 039 978 2220  
Email: anki@scottfin.com

#### 3.4. HEAD OFFICE

Postal address	Physical address	Contact Details	
PO Box 1325	52 Bram Fischer Street	Tel no:	(039) 978 2220
Scottburgh	Scottburgh	Fax no:	(039) 978 1123
4180	4180	E-mail:	info@scottfin.com
		Website:	www.scottfin.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 Information Officer of every public body, and

- 4.3.2.2. every Deputy Information Officer of every public and private body designated in terms of section 17(1) of PAIA<sup>1</sup> and section 56 of POPIA<sup>2</sup>;
- 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<sup>3</sup>; and
  - 4.3.3.2. access to a record of a private body contemplated in section 50<sup>4</sup>;
- 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 information officer 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<sup>5</sup> and 51<sup>6</sup> 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<sup>7</sup> and 52<sup>8</sup> providing for the voluntary disclosure of categories of records by a public body and private body, respectively;

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<sup>1</sup> Section 17(1) of PAIA- *For the purposes of PAIA, each public body must, subject to legislation governing the employment of personnel of the public body concerned, designate such number of persons as deputy information officers as are necessary to render the public body as accessible as reasonably possible for requesters of its records.*

<sup>2</sup> Section 56(a) of POPIA- *Each public and private body must make provision, in the manner prescribed in section 17 of the Promotion of Access to Information Act, with the necessary changes, for the designation of such a number of persons, if any, as deputy information officers as is necessary to perform the duties and responsibilities as set out in section 55(1) of POPIA.*

<sup>3</sup> Section 11(1) of PAIA- *A requester must be given access to a record of a public body if that requester complies with all the procedural requirements in PAIA relating to a request for access to that record; and access to that record is not refused in terms of any ground for refusal contemplated in Chapter 4 of this Part.*

<sup>4</sup> Section 50(1) of PAIA- *A requester must be given access to any record of a private body if-*  
 a) *that record is required for the exercise or protection of any rights;*  
 b) *that person complies with the procedural requirements in PAIA relating to a request for access to that record; and*  
 c) *access to that record is not refused in terms of any ground for refusal contemplated in Chapter 4 of this Part.*

<sup>5</sup> Section 14(1) of PAIA- *The information officer of a public body must, in at least three official languages, make available a manual containing information listed in paragraph 4 above.*

<sup>6</sup> Section 51(1) of PAIA- *The head of a private body must make available a manual containing the description of the information listed in paragraph 4 above.*

<sup>7</sup> Section 15(1) of PAIA- *The information officer of a public body, must make available in the prescribed manner a description of the categories of records of the public body that are automatically available without a person having to request access*

<sup>8</sup> Section 52(1) of PAIA- *The head of a private body may, on a voluntary basis, make available in the prescribed manner a description of the categories of records of the private body that are automatically available without a person having to request access*

- 4.3.9. the notices issued in terms of sections 22<sup>9</sup> and 54<sup>10</sup> regarding fees to be paid in relation to requests for access; and
- 4.3.10. the regulations made in terms of section 92<sup>11</sup>.
- 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 business hours.
- 4.5. The Guide can also be obtained-
  - 4.5.1. upon request to the Information Officer;
  - 4.5.2. from the website of the Regulator (<https://www.justice.gov.za/infoereg/>).
- 4.6. A copy of the Guide is also available in the following two official languages namely English and IsiZulu, for public inspection during office hours.

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<sup>9</sup> Section 22(1) of PAIA- The information officer of a public body to whom a request for access is made, must by notice require the requester to pay the prescribed request fee (if any), before further processing the request.

<sup>10</sup> Section 54(1) of PAIA- The head of a private body to whom a request for access is made must by notice require the requester to pay the prescribed request fee (if any), before further processing the request.

<sup>11</sup> Section 92(1) of PAIA provides that –“The Minister may, by notice in the Gazette, make regulations regarding-  
(a) any matter which is required or permitted by this Act to be prescribed;  
(b) any matter relating to the fees contemplated in sections 22 and 54;  
(c) any notice required by this Act;  
(d) uniform criteria to be applied by the information officer of a public body when deciding which categories of records are to be made available in terms of section 15; and  
(e) any administrative or procedural matter necessary to give effect to the provisions of this Act.”

## 5. AVAILABILITY OF RECORDS

Scottfin maintains the following categories of records and related subject matter. The status of the record's availability, the purpose for its processing and the relevant data subject category to who the record relates are set out below:

Category:	Record:	Availability:	Purpose:	Data Subject:
<b>Public Affairs</b>	Public Product Information	Freely Available	Convey Public Information	Organisation
	Public Corporate Records	Freely Available	Convey Public Information	Organisation
	Media Releases	Freely Available	Convey Public Information	Organisation
	Published Newsletters	Freely Available	Convey Public Information	Organisation
	Magazine Articles	Freely Available	Convey Public Information	Organisation
<b>Regulatory &amp; Administrative</b>	FSP license	Freely Available	Statutory Requirement	Organisation
	Promotion of Access to Information Manual	Freely Available	Statutory Requirement	Organisation
	Website & Email Disclaimers	Freely Available	Statutory Requirement	Organisation
	Privacy Policy	Freely Available	Statutory Requirement	Organisation
	Conflict of Interest Management Policy	Freely Available	Statutory Requirement	Organisation
	Complaint's resolution Policy	Freely Available	Statutory Requirement	Organisation
	Suspicious and unusual transactions Policy	PAIA Request	Statutory Requirement	Organisation
	Health & Safety Plan	PAIA Request	Statutory Requirement	Organisation
	Memorandum of Incorporation	PAIA Request	Statutory Requirement	Organisation
	Register of Board of Directors	PAIA Request	Statutory Requirement	Organisation
	Internal correspondence (e-mails/memos)	PAIA Request	Internal Communications	Employees
	Insurance Policies held by organization	PAIA Request	Risk Management	Organisation
<b>Human Resources</b>	Employment Applications	PAIA Request	Internal Referencing	Employees
	Employment Contracts	PAIA Request	Contractual Agreement	Employees
	Personal Information of Employees	PAIA Request	Internal Referencing	Employees
	Employment Equity Plan	PAIA Request	Statutory Requirement	Organisation
	Medical Aid Records	PAIA Request	Internal Referencing	Employees
	Pension Fund Records	PAIA Request	Internal Referencing	Employees
	Disciplinary Records	PAIA Request	Statutory Requirement	Employees
	Performance Management Records	PAIA Request	Internal Referencing	Employees
	Salary Records	PAIA Request	Internal Referencing	Employees
	Employee Benefit Records	PAIA Request	Internal Referencing	Employees
	PAYE Records	PAIA Request	Statutory Requirement	Employees
	Seta Records	PAIA Request	Statutory Requirement	Employees
	Disciplinary Code	PAIA Request	Statutory Requirement	Organisation
	Leave Records	PAIA Request	Internal Referencing	Employees
	Training Records	PAIA Request	Internal Referencing	Employees

	Training Manual	PAIA Request	Internal Referencing	Organisation
<b>Financial</b>	Financial Statements	PAIA Request	Statutory requirement	Organisation
	Financial and Tax Records	PAIA Request	Statutory Requirement	Organisation
	Asset Register	PAIA Request	Internal Referencing	Organisation
	Management Accounts and Reports	PAIA Request	Internal Referencing	Organisation
	Vouchers, Cash Books and Ledgers	PAIA Request	Internal Referencing	Organisation
	Banking Records and Statements	PAIA Request	Internal Referencing	Organisation
	Electronic Banking Records	PAIA Request	Internal Referencing	Organisation
<b>Marketing</b>	Market Information	PAIA Request	Internal Referencing	Organisation
	Product Brochures	PAIA Request	Internal Referencing	Organisation
	Advertisement policy	PAIA Request	Internal Referencing	Organisation
	Performance Records	PAIA Request	Internal Referencing	Organisation
	Product / Service Sales Records	PAIA Request	Internal Referencing	Organisation
	Marketing Strategies	PAIA Request	Internal Referencing	Organisation
<b>Client/ Customer</b>	Customer / Client Database	PAIA Request	Internal Referencing	Customers
	Customer / Client agreements	PAIA Request	Internal Referencing	Customers
	Customer / Client Files	PAIA Request	Internal Referencing	Customers
	Customer / Client Instructions	PAIA Request	Internal Communications	Customers
	Customer / Client Correspondence	PAIA Request	External Communications	Customers
<b>Third Party</b>	Intermediary agreements	PAIA Request	Contractual Agreement	Third Party
	Binder agreements	PAIA Request	Risk Management	Third Party
	Referral agreements	PAIA Request	Contractual Agreement	Third Party
	Outsource agreements	PAIA Request	Contractual Agreement	Third Party
	Non-disclosure agreements	PAIA Request	Contractual agreement	Third party
	Lease agreements	PAIA Request	Contractual agreement	Third party
	Service Provider agreements	PAIA Request	Contractual agreement	Third party

## 6. STATUTORY RECORDS

Administrative Adjudication of Road Traffic Offences
Basic Conditions of Employment Act
Broad Based Black Economic Empowerment Act
Companies Act
Competition Act
Compensation for Occupational Injuries and Diseases Act
Constitution of the Republic of South Africa
Copyright Act
Disaster Management Act
Electronic Communications Act
Electronic Communications and Transactions Act
Employment Equity Act
Financial Advisory and Intermediary Services Act
Financial Sector Regulation Act
Health and Safety Regulations
Income Tax Act
Insurance Act
Labour Relations Act
National Minimum Wage Act
National Payment System Act
National Qualifications Framework Act
Occupational Health and Safety Act
Policyholder Protections Rules 2017 Short Term Insurance
Prescription Amendment Act
Promotion of Equality and Prevention of Unfair Discrimination Act
Promotion of Access to Information Amendment Act
Protected Disclosures Act
Protection of Personal Information Act
Rental Housing Act
Skills Development Act



Skills Development Levies Act
Short Term Insurance Act
Tax Administration Act
Unemployment Insurance Act
Unemployment Insurance Contributions Act
Value-Added Tax Act

## 7. DESCRIPTION OF THE CATEGORIES OF DATA SUBJECTS AND THE INFORMATION OR CATEGORIES OF INFORMATION RELATING THERETO

Below is a description of all data subjects and the description of the nature or category of personal information to be processed.

<b>Category of Data Subjects</b>	<b>Types of Information processed</b>
<b>Individuals (customer, policyholders etc)</b>	Name, surname, South African identity number or other identifying number (e.g., passport), date of birth, age, marital status, citizenship, telephone numbers, email address, physical and postal addresses, drivers' licence, income tax number, employment information, occupation, financial information (e.g., remuneration), banking information including account numbers, claims and payment history, FICA documentation.
<b>Entities (Corporate Customers, Companies, Close Corporations, Trusts and Partnerships)</b>	Entity name, registration number, tax-related information, contact details for representatives, FICA documentation, beneficial owners' personal information (as for Individuals).
<b>Directors, Members, Partners &amp; Trustees</b>	Identity numbers, names, physical and postal address, contact numbers, email address & FICA documentation.
<b>Employees (potential employees, new recruitments, independent contractors)</b>	Name, surname, South African identity number or other identifying number (e.g., passport number), contact details, physical and postal address, date of birth, age, marital status, race, disability, information, employment history, criminal background checks, fingerprints, CVs, education history, banking details, income tax reference number, remuneration and benefit information, drivers' licence, health information, details related to employee performance, disciplinary procedure information.  May also include the personal information of children / minors, if they are listed as beneficiaries or dependants.
<b>Service providers (including outsourced or hosted services, auditors, etc)</b>	Company registration details, identity numbers, BEE certificates, tax clearance, income tax and VAT registration details, payment information including bank account numbers, invoices, contractual agreements, addresses, contact details.

## **8. THE CATEGORIES OF RECIPIENTS TO WHOM THE PERSONAL INFORMATION MAY BE SUPPLIED**

Below is a description of recipients to whom your personal information may be shared:

- Service providers who are involved in the delivery of products or services to you. We have agreements in place to ensure that they comply with the privacy requirements as required by the Protection of Personal Information Act.
- Entities within the Group. We only do this, in instances where we have received your express consent to do so.
- Insurers, intermediaries, administrators, and Underwriting Managers.
- Provident Funds and their Trustees and Principal Officers.
- Medical aid companies.
- Recruitment organisations that may collect information on our behalf.
- Regulators and Law Enforcement Agencies.
- Motor Licencing Bureau.
- Original Equipment Manufacturers (OEMs).
- Banks and other financing Institutions.
- The South African Revenue Service (SARS).
- Auditors and External Compliance Practices

## **9. PLANNED TRANSBORDER FLOWS OF PERSONAL INFORMATION**

9.1. Scottfin Insurance Brokers make use of hosted services provided by third parties. These operations may be hosted in various countries resulting in the transfer of personal information.

9.2. In general, we try as far as possible to ensure that these service providers are located in jurisdictions with strong data protection legislation, such as the European Union or the United Kingdom. Where this is not possible, data protection requirements are enforced by means of contractual agreement.

## **10. GENERAL DESCRIPTION OF INFORMATION SECURITY MEASURES TO BE IMPLEMENTED BY THE RESPONSIBLE PARTY TO ENSURE THE CONFIDENTIALITY, INTEGRITY AND AVAILABILITY OF THE INFORMATION.**

10.1. We take every reasonable precaution to protect your personal information (including information about your activities) from theft, unauthorized access, and disruption of services.

10.2. Our security controls are designed to maintain an appropriate level of data confidentiality, integrity, and availability. We regularly test our website, data centers, systems, and other assets for security vulnerabilities.

10.3. Our security policies and procedures cover:

- Physical and environmental security controls.
- Network security.
- Protection from viruses and other malware.
- Restricted access and password control to personal information.
- Secure communications (email encryption).
- Secure remote working (VPN access only to the networks).
- Acceptable usage of IT equipment and mobile devices (Exit and entry procedures for staff).
- Clean Desk Policy.
- Lockable cabinets for physical storage of records with restricted access.
- IT disaster recovery and backup procedures.
- Training and awareness initiatives.
- Retention and disposal of information (Shred it).
- Cyber Security Incident Response.

- Active monitoring and review of the IT and business environment.

10.4. When we contract with third parties, we impose appropriate security, privacy, and confidentiality obligations on them to ensure that personal information that we remain responsible for, is kept secure. We will ensure that anyone to whom we pass your personal information agrees to treat your information with the same level of protection as we are obliged to.

## 11. REQUEST FOR INFORMATION PROCEDURE

11.1. To facilitate the processing of your information request, kindly complete the form marked Annexure A. The form must be submitted to the Deputy Information Officer whose details appear in this policy.

11.2. The Deputy Information Officer will notify you that a request for access has been received and that the prescribed fee (if any) is payable prior to processing the request. Please refer to Annexure B for a full breakdown of fees payable.

11.3. Please be advised that PAIA provides a number of grounds on which a request for access to information may be refused. These grounds mainly comprise instances where:

- the privacy and interests of other individuals are protected.
- where such records are already otherwise publicly available.
- instances where public interest are not served.
- the mandatory protection of commercial information of a third party.
- the mandatory protection of certain confidential information of a third party.

11.4. When completing the form below please:

- indicate the identity of the person seeking access to the information
- provide sufficient particulars to enable the Deputy Information Officer to identify the information requested
- specify the format in which the information is required
- indicate the contact details of the person requiring the information
- indicate the right to be exercised and/or to be protected, and specify the reasons why the information required will enable the person to protect and/or exercise the right
- where the person requesting the information wishes to be informed of the decision of the request in a particular manner, state the manner and particulars to be so informed
- if the request for information is made on behalf of another person, submit proof that the person submitting the request, has obtained the necessary authorisation to do so.

## 12. AVAILABILITY OF THE MANUAL


12.1. A copy of the Manual is available-

- on [www.scottfin.com](http://www.scottfin.com);
- at the Scottfin Head Office for public inspection during normal business hours;
- to any person upon request and upon the payment of a reasonable prescribed fee; and
- to the Information Regulator upon request.

12.2. A fee for a copy of the Manual, as contemplated in Annexure B, shall be payable per each A4-size photocopy made.

### 13. POLICY REVIEW

This policy will be reviewed on an ad hoc basis if there are any changes to the business operations or legislation that warrant such change. Alternatively, the policy will be reviewed once annually.

Name of the policy	Version NO	Reason for change	Author	Approver	Approver	Effective date
PAIA MANUAL	IC043V1	New Policy	Mpilo Shabalala	Debbie Holroyd		
PAIA MANUAL	IC043V2	Amendment to Policy	Prenisha Naidoo	Debbie Holroyd		1 December 2021

## ANNEXURE A: REQUEST FOR INFORMATION PROCEDURE

<b>A. Particulars of Private Body</b>	
The Head:	
<b>B. Particulars of person requesting access to the record</b>	
(i) The particulars of the person who requests access to the record must be recorded below	
(ii) Furnish an address and/or fax number in the Republic to which information must be sent	
(iii) Proof of the capacity in which the request is made, if applicable, must be attached	
Full names & surname:	
Identity number:	
Postal address:	
Fax number:	
Telephone number:	
Email address:	
Capacity:	
<b>C. Particulars of person on whose behalf request is made</b>	
This section must be completed <i>ONLY</i> if a request for information is made on behalf of another person	
Full names & surname:	
Identity number:	
<b>D. Particulars of Record</b>	
(i) Provide full particulars of the record to which access is requested, including the reference number if that is known to you	
(ii) If the provided space is inadequate, please continue on a separate page and attach to this form. Please sign any additional pages	
Description of record:	
Reference number:	
Any further particulars:	
<b>E. Fees</b>	
(i) 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	
(ii) You will be notified of the amount required to be paid as the request fee	
(iii) 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	
(iv) If you qualify for exemption of the payment of any fee, please state the reason therefor	
Reason for exemption:	

**F. 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 hereunder, please state your disability and indicate in which form the record is required

Disability:

Form in which required:

Mark the appropriate box with an "X"

- (i) Your indication as to the required form of access depends on the form in which the record is available
- (ii) Access in the form requested may be refused in certain circumstances, In such a case you will be informed of access will be granted in another form
- (iii) 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
- transcription of the images

3) If the record consists of recorded words or information which can be reproduced in sound:

- listen to the soundtrack
- transcription of the soundtrack

4) If the record is held on computer or in an electronic or machine-readable form:

- printed copy of record
- copy in computer readable form

Please indicate the preferred method of delivery

- By hand
- Email
- Post
- Fax

**G. 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 additional folios.

Indicate which right is to be exercised or protected:

Explain why the record requested is required for the exercise or protection of the aforementioned right:

**H. Notice of decision regarding the 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?

**I. Signature page**

Signed at:

Date:

Signature of Requester / Person on whose behalf request is made:

## ANNEXURE B: PRESCRIBED FEES

No.	Description	Fee
1.	The request fee payable by every requester	R140.00
2.	Photocopy/printed black & white copy of A4-size page	R2.00
3.	Printed copy of an A4 size page	R2.00
4.	For a copy in a computer-readable form on:	
	i. Flash drive (to be provided by requester)	R40.00
	ii. Compact disc:	
	- If provided by requestor	R40.00
	- If provided to the requestor	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 on:	
	i. Flash drive (to be provided by requester)	R40.00
	ii. Compact disc:	
	- If provided by requestor	R40.00
	- If provided to the requestor	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 a total cost of	R145.00
10.	Deposit: If search exceeds 6 hours	One third of amount per request  ito items 2-8.
11.	Postage, e-mail or any other electronic transfer	Actual expense, if any.



