



INFANTRY SECURITY (PTY) LTD

Registration Number: 2000/024695/07

PAIA AND POPIA MANUAL

In terms of Section 51 of the Promotion of Access to Information Act No 2 of 2000 as amended ("PAIA") and Section 55 of the Protection of Personal Information Act No. 4 of 2013 ("POPI Act")

Date of Compilation	30 August 2021		
Date of Revision	N/A		
Document Status	X	ACTIVE	INACTIVE



<u>INDEX</u>	<u>PAGE</u>
1. Background to the Promotion of Access to Information Act	3
2. Infantry Security Services (Pty) Ltd	3
3. Background to the Protection of Personal Information Act	3
4. Purpose of Manual	4
5. Details of the Information Officer and Deputy Information Officers	4
6. Guide compiled by the Information Regulator of South Africa	5
7. Subjects and Categories of Records available in terms of legislation, on Request or without Request	5
8. The Request Procedure	8
9. Fees	9
10. Refusal of a Request for Information	9
11. Protection of Personal Information processed by Infantry Security	10
12. The Categories of Data Subjects and the Information we Process	12
13. With whom we share Personal Information	13
14. Description of the Information Security Measures implemented by Infantry	13
15. PAIA Request Form	15
16. Fees Schedule	17



1. Background to the Promotion of Access to Information Act

- 1.1 The Promotion of Access to Information Act, No. 2 of 2000 (PAIA) was enacted on 3 February 2000, to give effect to the constitutional right of access to information held by the State and any information that is held by any other private body that is required for the exercise or protection of any right, as guaranteed in Section 32 in the Bill of Rights in the Constitution of the Republic of South Africa.
- 1.2 In terms of Section 51 of PAIA, all private bodies are required to compile an Information Manual generally referred to as a “PAIA Manual”.
- 1.3 Where a Request for information is made in terms of PAIA, the body to whom the Request is made is obliged to release the information, subject to applicable legislative and/or regulatory requirements and the justifiable limitations set out in section 9 of the Act.
- 1.4 Infantry Security may amend this Manual from time to time. It is available and accessible on our website – www.infantry.co.za, or on request to Infantry’s designated Information Officer (being the person duly authorized by the head of Infantry Security and appointed by Infantry Security to act in this capacity).

2. Infantry Security Services (Pty) Ltd (“Infantry Security”)

- 2.1 Infantry Security is a security solutions provider and are experts in our field.
- 2.2 Clinton McCabe is the Managing Director and Founder of Infantry Security which was established to aid and assist families & communities who were affected by increasing crime levels.
- 2.3 Our specialized and personal service has had a positive effect on all our trusted clients. Our reputation in the market has resulted in many of our clients coming from word of mouth. Infantry Security has always focused on Value for money, Friendliness, Quality, and Professionalism.
- 2.4 Our Mission is to provide our clients with superior levels of service excellence through people, technology, equipment and products.

3. Background to the Protection of Personal Information Act

- 3.1 The purpose of the Act is to give effect to the constitutional right to privacy, by safeguarding Personal Information when Processed by a Responsible Party, subject to justifiable limitations that are aimed at—
 - balancing the right to privacy against other rights, particularly the right of access to information; and
 - protecting important interests, including the free flow of information within the Republic and across international borders;
 - regulate the manner in which personal information may be Processed, by establishing conditions, in harmony with international standards, that prescribe the minimum threshold requirements for the lawful Processing of Personal Information;
 - provide persons with rights and remedies to protect their Personal Information from Processing that is not in accordance with the Act; and



- establish voluntary and compulsory measures, including the establishment of an Information Regulator, to ensure respect for and to promote, enforce and fulfil the rights protected by the Act.

4. Purpose of Manual

- 4.1 The purpose of this Manual is to promote the right of access to information, to foster a culture of transparency and accountability within Infantry Security by giving the right to information that is required for the exercise or protection of any right and to actively promote a society in which the people of South Africa have effective access to information to enable them to exercise and protect their rights.
- 4.2 Under the POPI Act, Infantry Security is required to be open and transparent about how Infantry Security handles Personal Information and allow individuals to access and correct their Personal Information.
- 4.3 This PAIA Manual complies with the requirements of guide mentioned in section 10 of the Act and recognizes that upon commencement of the Protection of Personal Information Act 4 of 2013, that the appointed Information Regulator will be responsible to regulate compliance with the Act and its regulations by private and public bodies.
- 4.4 This Manual may be revised from time to time to reflect changes in laws and regulations, or changes in Infantry Security's business operation.

5. Details of Infantry Security and the Information Officer

5.1 *(Information provided in terms of section 51(1) of PAIA)*

Name: Infantry Security Services (Pty) Ltd

Physical Address: Waterfall Office Park, Mac Mac Road, Vorna Valley, Midrand, 1685

Postal Address: P.O Box 50284, Randjiesfontein, Halfway House, 1683

Telephone Number: 011 315-5055

Website: www.infantry.co.za

Information Officer: Dirkie van Niekerk **Email:** accounts@infantry.co.za



- 5.2 Infantry Security has opted to appoint Deputy Information Officers as allowed in terms of section 17 of the Act as well as section 56 of the Protection of Personal Information Act.

Deputy Information Officer 1: Mokgadi Johanna Kobe
 Telephone: 011 315-5055
 Email: reception@infantry.co.za

Deputy Information Officer 2: Noza Benneth Mbhalati
 Telephone: 011 315-5055
 Email: ops@infantry.co.za

6. Guide compiled by the Information Regulator of South Africa

- 6.1 A guide to the Act (as contemplated under section 10 of the Act) is available from the South African Human Rights Commission. The guide contains such information as may reasonably be required by a person who wishes to exercise any right contemplated in the Act. Any enquiries regarding this guide and its contents should be directed to:

- 6.2 The South African Human Rights Commission:

PAIA Unit (the Research and Documentation Department)
 Postal address: Private Bag 2700, Houghton, 2041
 Telephone: +27 11 484-8300
 Fax: +27 11 484-7146
 Website: <https://www.sahrc.org.za>
 E-mail: PAIA@sahrc.org.za

7. Subjects and Categories of Records available in terms of legislation, on Request or without Request

- 7.1 Records which are freely available in terms of (Section 51(1)(c) of PAIA.

- 7.1.1 The following records are automatically available to the general public and need not be Requested in accordance with the procedure outlined in this Manual:

- a) Brochures
- b) Information available on Infantry's website

- 7.1.2 Where applicable to its operations, Infantry also retains records and documents in terms of the legislation below. Unless disclosure is prohibited in terms of relevant legislation, regulation or otherwise, these records are available, subject to approval, on a Request that has been made in accordance with PAIA.



No	Act	Reference
1.	<i>Arbitration Act</i>	42 of 1965
2.	<i>Basic Conditions of Employment Act</i>	75 of 1997
3.	<i>Companies Act</i>	71 of 2008
4.	<i>Compensation of Occupational Injuries & Diseases Act</i>	130 of 1993
5.	<i>Copyright Act</i>	98 of 1978
6.	<i>Competition Act</i>	71 of 2008
7.	<i>Criminal Procedure Act</i>	51 of 1977
8.	<i>Cybercrimes Act</i>	19 of 2020
9.	<i>Currency and Exchanges Act</i>	9 of 1933
10.	<i>Employment Equity Act</i>	55 of 1998
11.	<i>Electronic Communications Act</i>	36 of 2005
12.	<i>Financial Intelligence Centre Act</i>	38 of 2001
13.	<i>Firearms Control Act</i>	60 of 2000
14.	<i>Income Tax Act</i>	95 of 1967
15.	<i>Labour Relations Act</i>	66 of 1995
16.	<i>National Credit Act</i>	34 of 2005
17.	<i>Occupational Health & Safety Act</i>	85 of 1993
18.	<i>Pension Funds Act</i>	24 of 1956
19.	<i>Prevention of Organised Crime Act</i>	121 of 1998
20.	<i>Private Security Industry Regulation Act</i>	56 of 2001
21.	<i>Promotion of Access to Information Act</i>	2 of 2000
22.	<i>Protection of Personal Information Act</i>	4 of 2013
23.	<i>Protection of Businesses Act</i>	99 of 1978
24.	<i>Skills Development Levies Act</i>	9 of 1999
25.	<i>Unemployment Contributions Act</i>	4 of 2002
26.	<i>Unemployment Insurance Act</i>	63 of 2001
27.	<i>Value Added Tax Act</i>	89 of 1991



7.2 Records held by Infantry Security that are available on Request (Section 51(1)(e))

CATEGORY	RECORDS
Administration	<ul style="list-style-type: none"> • Licenses • Correspondence
Company Information	<ul style="list-style-type: none"> • Infantry Security Records • Incorporation Documents • PSIRA Certification
Property	<ul style="list-style-type: none"> • Lease Agreement
Income Tax Records	<ul style="list-style-type: none"> • PAYE Records • Records of Payments made to SARS for VAT purposes Documents relating to all other statutory requirements Skills Development Levies • UIF • Workmen's Compensation
Financial Records	<ul style="list-style-type: none"> • Accounting Records Annual Financial Reports • Annual Financial Statements Asset Registers • Bank Statements • Banking Details and Bank Accounts Banking Records • Debtors / Creditors Statements and Invoices General Ledgers and subsidiary ledgers General Reconciliations • Invoices • Salary Information • Tax Returns
Human Resources	<ul style="list-style-type: none"> • Disciplinary Records • Employee Information including personal information, employment history and health records that Infantry may hold from time to time • Employment Contracts • Employment Equity • Labour & Industrial Relations • Payroll reports / Wage Registers • Provident Fund benefits and contributions • Records relating to the vetting of an employee in terms with company policy • Remuneration, Benefits and Policies Conditions of Employment • Salary Records • SETA Records • Training Records



Procurement	<ul style="list-style-type: none"> • Supplier Agreements • Details of Suppliers including general business name, address, contract person, email address, postal address and bank account details
Client Related Records	<ul style="list-style-type: none"> • Client Details • Client Agreements • Correspondence
Risk Management and Reports	<ul style="list-style-type: none"> • Risk Management Policies & Procedures • Risk Management Plan
IT Department	<ul style="list-style-type: none"> • Domain Information • Hardware asset register • Software licensing
Operations	<ul style="list-style-type: none"> • Incident Reports • OB reports
Corporate Social Responsibility	<ul style="list-style-type: none"> • General information related to corporate social responsibility • Records of organisations receiving funding

7.2.1 Please note that a Request made for records listed above may be refused on grounds set out in this PAIA Manual. If the information relates to a third party, we will require consent to disclose, in addition to the other requirements when a Request is made.

8. The Request Procedure in accordance with PAIA [s 53(1)]

8.1 The Request for information must comply with the procedural requirements of the Act.

8.2 The Request must be made on the prescribed form attached hereto for ease of reference, and submit same along with the proof of payments of the prescribed fee (if any) to the Information Officer at the postal, physical or electronic email address as contained in Clause 3.1 above.

8.3 The prescribed form must be filled in with sufficient detail to enable the Information Officer to:

8.3.1 Identify the records; and

8.3.2 Establish the identity of the requester.

8.4 To enable the Information Officer to respond to the Request the requester needs to advise how they would prefer to be granted access and provide a postal or physical address within the Republic of South Africa.

8.5 The requester must advise that the Request is made in order to protect or exercise a right and clearly state what the nature of the right is that the requester seeks to exercise or protect. The requester must also specify why the record sought is necessary to exercise or protect the right in question (refer to Section 53(2)(d)).



- 8.6 If the Request is made on behalf of another person, the requester must submit proof of the capacity in which the requester is making the request to the satisfaction of the Information Officer or Deputy Information Officer.
- 8.7 The prescribed fee must be paid before Infantry Security can process the Request.
- 8.8 Infantry Security will process the Request within 30 (thirty) days.
- 8.9 All information listed in this Clause 6 must be provided, failing which the Request will be delayed. The time frame as set out above shall not commence until all the necessary and required information has been received.
- 8.10 If you are not satisfied about the way in which your Request was handled by Infantry Security (including where you are not happy about the Access Fee charged by Infantry Security or the length of time Infantry Security is taking to process your Request), you can make an application for relief to the Constitutional Court, the High Court or another court of similar status.
- 8.11 If an individual is unable to complete the prescribed form because of illiteracy or disability, such a person may make the request orally to the Information Officer

9. Fees

- 9.1 A requester who seeks access to a record containing Personal Information about the requester is not required to pay any fees.
- 9.2 If an application for information is made on behalf of another person, the requester must pay a fee of R50.00. The Information Officer shall advise the requester if a fee is payable and will do so before processing the Request. A requester may lodge an application to court against the tender or payment of a fee as described above.

10. Refusal of an Application for Information

- 10.1 In terms of PAIA, Infantry Security **must refuse** an application for information if (subject to certain exclusions):
 - 10.1.1 The disclosure would unreasonably disclose Personal Information about a third party, including a deceased individual;
 - 10.1.2 The disclosure contains trade secrets of a third party;
 - 10.1.3 The disclosure is likely to cause harm to the commercial or financial interests of a third party;
 - 10.1.4 The disclosure would put a third party at a disadvantage during contractual negotiations;
 - 10.1.5 The disclosure would be prejudicial to a third party in terms of commercial competition;
 - 10.1.6 The disclosure would constitute a breach of a duty of confidence owed to a third party;
 - 10.1.7 The disclosure could reasonably endanger the life or physical safety of an individual;
 - 10.1.8 The information is protected by legal privilege;



- 10.1.9 The disclosure would seriously disadvantage research carried by or on behalf of third party, and would identify the third party, a person carrying out the research and/or the subject matter of the research.
- 10.2 Infantry Security **may refuse** an application for information if (subject to certain exclusions):
- 10.2.1 The disclosure is likely to prejudice or impairs the security of a building, structure or system, including a computer or communication system;
- 10.2.2 The disclosure may compromise the methods, systems, plans or procedures of an individual that is included in a witness protection scheme;
- 10.2.3 The disclosure will compromise the safety of the public, or any part of the public;
- 10.2.4 The disclosure contains trade secrets of Infantry Security;
- 10.2.5 The disclosure is likely to cause harm to the commercial or financial interest of Infantry Security;
- 10.2.6 The disclosure would put Infantry Security at a disadvantage during contractual negotiations;
- 10.2.7 The disclosure would be prejudicial to Infantry Security in terms of commercial competition;
- 10.2.8 The disclosure relates to a computer program, as defined in Section 1 (1) of the Copyright Act, No 98 of 1978, owned by Infantry Security;
- 10.2.9 The disclosure would seriously disadvantage research carried by Infantry Security or would identify the identity of a person carrying out the research on behalf of Infantry Security and/or the subject matter of the research.
- 10.3 All applications will be assessed on their own merits and in accordance with the applicable legislation.
- 10.4 If a requested record cannot be found or alternatively does not exist, the Information Officer shall, by way of an affidavit, notify the requester that access to the record cannot be provided. Such a notice shall be deemed “refusal of a request” but should the record be found at a later stage access shall be given to the requester unless the application was refused on other allowable grounds.
- 10.5 In the event that a requester or third party being dissatisfied with a refusal to grant access, he/she may, within 30 (thirty) days of notification of the decision, apply to the appropriate Court as set out above.

11. Protection of Personal Information processed by Infantry Security

- 11.1 The purpose of Processing your Personal Information:
- 11.1.1 We will only use your Personal Information when the law allows us to use the information.
- 11.1.2 Most commonly we use your Personal Information in the following circumstances:
- 11.1.2.1 Consent: Where you have given us your consent to use the information;



- 11.1.2.2 Contract Performance: When the information is necessary to enter into a contract with you and during our contract performance to you;
 - 11.1.2.3 Legal Obligation: When it is necessary for us to use your Personal Information to comply with a legal obligation;
 - 11.1.2.4 Legitimate interest: Where we as a Responsible Party have established a legitimate interest to Process the information and our reasons for using the information outweighs the prejudice to your rights as a Data Subject;
 - 11.1.2.5 Legal Claim: Where your information is necessary to prosecute, defend or make a claim against you or another third party;
 - 11.1.2.6 Your Interest: In the instances where it becomes necessary to use your Personal Information to protect your interest or someone else's interest;
 - 11.1.2.7 Public Interest: Where it is in the public interest to use your Personal Information.
- 11.2 Chapter 3 of POPI provides for the minimum Conditions for Lawful Processing of Personal Information by a Responsible Party. These conditions may not be derogated from unless specific exclusions apply as outlined in POPI. Below is a description of the eight Conditions for Lawful Processing as contained in POPI:
- 11.2.1 Accountability - the Responsible Party has an obligation to ensure that there is compliance with POPI in respect of the Processing of Personal Information.
 - 11.2.2 Processing limitation - Personal Information must be collected directly from a Data Subject to the extent applicable; must only be processed with the consent of the Data Subject and must only be used for the purposes for which it was obtained.
 - 11.2.3 Purpose specification - Personal Information must only be Processed for the specific purpose for which it was obtained and must not be retained for any longer than it is needed to achieve such purpose.
 - 11.2.4 Further processing limitation - further Processing of Personal Information must be compatible with the initial purpose for which the information was collected.
 - 11.2.5 Information quality - the Responsible Party must ensure that Personal Information held is accurate and updated regularly and that the integrity of the information is maintained by appropriate security measures.
 - 11.2.6 Openness - there must be transparency between the Data Subject and the Responsible Party.
 - 11.2.7 Security safeguards - a Responsible Party must take reasonable steps to ensure that adequate safeguards are in place to ensure that Personal Information is being Processed responsibly and is not unlawfully accessed.
 - 11.2.8 Data Subject participation - the Data Subject must be made aware that their information is being Processed and must have provided their informed consent to such Processing.



12. The categories of Data Subjects and the information we Process

12.1 We Process the Personal Information of the following categories of Data Subjects:

Category of Data Subject	Personal Information Processed and/or Retained
Employees	Name & Surname Contact Details Gender Age Race Marital Status Details of Spouse and Dependents Address Identity Number and copy of your Identity Documents / passport Employment History and references Banking details Details of third parties in whose favour deductions are made Employment Contract Employment Equity Details Medical Aid Records Pension and/or Provident Fund details Salary & Benefit Details Performance Appraisals Disciplinary Records Records Pertaining to your leave Training Records Proof of educational and professional memberships Proof of Firearms Licenses Biometric data (fingerprints) Criminal Records

	Polygraphs Test Results Drug and/or alcohol tests CCTV recordings / images Psychometric Testing
Prospective Employees	Name Surname Contact Details Educational and other training done Employment History Current Employer Current Salary



Clients	Name Registration Number Identity Number (if in the case of a natural person) Details of Contact person Contact Details including phone & fax number, postal address, email address Physical Address Banking Details
Prospective Clients (which may include employees)	Name Contact Details Location
Vendors/ Suppliers / Sub-contractors / Consultants and other professional business advisors	Name Registration Number Identity Number (natural persons) Contact Person Details Contact Details including phone & fax number, postal address, email address Physical Address Banking Details
Members of the Public	Information collected via CCTV monitoring and investigations as a security service provider

13. With whom we share your Personal Information

- 13.1 Infantry Security comprises of various divisions/subsidiary companies and we share and Process your information within our divisions or subsidiary companies for operational requirements.
- 13.2 Infantry Security will share your information, to the extent necessary, with the following third parties:
- 13.2.1 Our professional service advisors including legal, financial, risk management, bankers, auditors and other advisors used in the ordinary course of our business;
- 13.2.2 Our insurers and insurance brokers;
- 13.2.3 Other third party external service providers and or advisers including marketing and Information Technology service providers;
- 13.2.4 Regulators and law enforcement agencies to the extent required by any law and/or regulation.

14. Description of the information security measures implemented by Infantry Security

- 14.1 As a service provider that aims to secure your assets, we will also take all reasonable physical, technical and managerial measures to protect your Personal Information from unlawful access, use, disclosure or destruction.
- 14.2 Our measures include, but are not limited to, implementing appropriate access controls, investing in our information security capabilities, and keeping into consideration best industry



practices.

- 14.3 Access to your Personal Information is only permitted amongst our employees and agents on a need-to-know basis and subject to contractual confidentiality obligations. Our staff receives regular communications relating to POPIA and the role they play when Processing and/or retaining Personal Information.



REQUEST FOR ACCESS TO RECORD OF PRIVATE BODY
(Section 53(1) of the Promotion of Access to Information Act, 2000
(Act No. 2 of 2000))

[FORM C]

A. Particulars of private body

The Head/Designated Person: _____

B. Particulars of person requesting access to the record

(a) The particulars of the person who requests access to the record must be given below.
(b) The address and/or fax number in the Republic to which the information is to be sent must be given.
(c) Proof of the capacity in which the request is made, if applicable, must be attached.

Full names and surname: _____

Identity number: _____

Postal address: _____

Fax number: _____ Telephone number: _____

E-mail address: _____

Capacity in which request is made, when made on behalf of another person: _____

C. Particulars of person on whose behalf request is made

This section must be completed ONLY if a request for information is made on behalf of another person.

Full names and surname: _____

Identity number: _____



D. 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.**

1. Description of record or relevant part of the record: _____

2. Reference number, if available: _____
3. Any further particulars of record: _____

E. Fees

- (a) A request for access to a record, other than 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 for exemption.

Reason for exemption from payment of fees: _____

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 in 1 to 4 hereunder, state your disability and indicate in which form the record is required.

Disability: _____	Form in which record is required: _____
<p>Mark the appropriate box with an X.</p> <p>NOTES:</p> <ul style="list-style-type: none"> (a) Compliance with your request in the specified form may depend 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 (this includes photographs, slides, video recordings, computer-generated images, sketches, etc.):					
	View the images		copy of the images*	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? Postage is payable.				YES	NO

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 the additional folios.***

1. Indicate which right is to be exercised or protected: _____
2. Explain why the record requested is required for the exercise or protection of the aforementioned right:

H. 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 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? _____

Signed at _____ this _____ day of _____ 20____

SIGNATURE OF REQUESTER / PERSON
ON WHO'S BEHALF REQUEST IS MADE



SCHEDULE 2 – FEES

GENERAL: VALUE-ADDED TAX Private bodies registered under the Value-Added Tax Act, 1991 (Act 89 of 1991, as vendors may add value-added tax to all fees prescribed in this annexure.

Applicable Fees In Respect Of Private Bodies In Relation to PAIA
Fees in respect of Private Bodies
1. The fee for a copy of the manual as contemplated in regulation 9 (2) (c) is R0,00 for every photocopy of an A4-size page or part thereof.
2. The fees for reproduction and access referred to in regulation 11 (1) and (3) are as follows:
a) For every photocopy of an A4-size page or part thereof R1,25
b) For every printed copy of an A4-size page or part thereof held on a computer or in electronic or machine-readable form R0,85
c) For a copy in a computer-readable form on:
I. Compact Disc R8,55
II. DVD R79,80
III. Digital Audio Format R68,40
IV. For a transcription of visual images, for an A4-size page or part thereof R45,60
V. For a copy of visual images R34,20
3. The request fee payable by a requester, other than a personal requester, referred to in regulation 11 (2) is R50,00.
1. For purposes of section 54 (2) of the Act, the following applies: R30,00
a) Six hours as the hours to be exceeded before a deposit is payable; and
b) one third of the access fee is payable as a deposit by the requester.
2. The actual postage is payable when a copy of a record must be posted to a requester.

