

HELFIN RISK MANAGEMENT (PTY) LTD AND HELFIN PRIVATE WEALTH (PTY) LTD

HelFin Risk Management Co (Pty) Ltd FSP number 7976, Co Reg No 19961098707 & HelFin Private Wealth (Pty) Ltd FSP number 10878, Co Reg No 64569307.

MANUAL PUBLISHED IN TERMS OF

SECTION 14 MANUAL: PROMOTION OF ACCESS TO INFORMATION

COMPILED BY: INFORMATION OFFICER

TELEPHONE: 012 346 3001

**MANUAL PREPARED IN TERMS OF SECTION 14 OF THE PROMOTION OF ACCESS TO
INFORMATION ACT, 2000**

TABLE OF CONTENTS

- 1 INTRODUCTION
- 2 AVAILABILITY OF THIS MANUAL
- 3 REQUESTS FOR INFORMATION
- 4 HELFIN PRIVACY OFFICER CONTACT DETAILS
- 5 HELFIN'S PRIVACY PROCEDURES
- 6 TYPES OF RECORDS HELD BY LIBERTY
- 7 CONSIDER BEFORE SUBMITTING A REQUEST
- 8 HOW TO SUBMIT REQUEST FOR ACCESS

ANNEXURE 1:

REQUEST FOR ACCESS TO RECORDS OF PRIVATE BODY

ANNEXURE 2:

FEES IN RESPECT OF PRIVATE BODIES

1. INTRODUCTION

The PAIA Guide provides information on the promotion of Access to Information Act of 2000 (PAIA).

The PAIA guide will assist the data subject making requests for information.

The purpose of PAIA is to promote the right of access to information, to promote a philosophy of transparency and accountability in South Africa. It is the data subjects constitutional right to request access to their personal information.

This information manual ("Manual") provides an outline of the types of records held by Helfin Private Wealth and explains how a data submit may request access to these records in terms of the Promotion of Access to Information Act, 2 of 2000 (the "Act").

A guide to the Act is available from the South African Human Rights Commission ("SAHRC") website: www.sahrc.org.za. It describes, in each of official language:

- What the objective of this Act are;
- The details of each private body (where possible);
- The process that needs to be followed in order to make a request;
- How to get copies of the Guide at no charge;
- How to get access to the manual of a private body; and
- All the remedies available in law to you.

Should you have any questions regarding the Act, please contact the SAHRC directly at:
The South African Human Rights Commission: PAIA Unit The Research and Documentation Department

Postal address: Private Bag 2700, Houghton 2041

Tel: +27 11 887-3803

Fax: +27 11 403-0625

Website: www.sahrc.org.za

E-mail: paia@sahrc.org.za

2. AVAILABILITY OF THIS MANUAL

The data subject/requester, can access this manual our website(www.helfin.co.za) or by contacting us at marketing@helfin.co.za

3. REQUESTS FOR INFORMATION

The data subject may submit a request for information records to Helfin Private Wealth through our Information Officer. Ensure you are well information of all your rights and where your information is stored and how it is protected.

4. HELFIN PRIVACY OFFICER CONTACT DETAILS

106 Nicolson Street, Brooklyn, Pretoria, 0181

Tel: +27 11 346 3001 / Tel: +27 76 813 5561

E-mail: marketing@helfin.co.za

5. HELFIN'S PRIVACY PROCEDURES

5.1 Why do we collect personal information?

- To ensure that we meet our responsibilities to our employees' customers
- To follow instructions given by our clients
- To keep our clients up to dated with products and services

5.2 Employee personal information may be received from or provided to:

- Pension / provident funds and/or their trustees
- Medical aid funds
- Recruitment companies
- Credit bureaux

5.3 Our security procedures

- Helfin is committed and obligated to ensure all information is secure and safeguards are in place to ensure the protection of all personal information stored and process by Helfin.
- When third parties are required to process personal information for services on behalf of Helfin they are obligated to follow strict protocols and also have contractual agreements to do so.

6. TYPES OF RECORDS HELD BY LIBERTY

Helfin Financial Services will maintain the following types of data records,

6.1 Company records

- Finance and accounting records
- Human Resources.
- Strategy.
- Shareholders.
- Intermediaries.
- Operational records.
- Technology.
- Compliance and Risk.
- Subsidiary.
- Contractors; and
- Directors

6.1.1 Types of personal information held by Helfin Private Wealth

Categories of data subjects	Categories of information held
Customers including policy holders / investors / beneficiaries / trustees / life assured / claimants / guardians	Such as name, South African identity number or other identifying number (e.g. passport), date of birth, citizenship, telephone number(s), email address(es), income tax numbers, physical and postal addresses, financial information (e.g. fund or portfolio details), banking information (including account numbers), health information. For juristic persons: entity name, registration number, income tax number, tax information, contact details for representative persons. FICA documentation used to verify identity and details of customer.
Directors	ID numbers, name, financial information as required for statutory reporting
Employees	Includes ID 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 (including medical aid, pension / provident fund information), details related to employee performance, disciplinary procedures.
Service Providers, including outsourced / hosted services, auditors	Includes company registration details, income tax and VAT registration details, BEE certificates, payment details including bank accounts, invoices, contractual agreements, addresses, contact details, any records a third party has provided to Liberty; and Records generated by or within Liberty pertaining to work or services, including transactional records.

6.2 Other Parties

Other parties include but are not limited to contractors, suppliers, departments, service providers. These parties may possess records which fall within data held by Helfin Private Wealth. The following records fall under this category:

- Employees information and records
- Financial records
- Correspondence, contracts, records of suppliers/providers

7. CONSIDER BEFORE SUBMITTING A REQUEST

Are you requesting your own information?

All clients are allowed access to their own information without having to use the request for access to information procedures as set out in the Promotion of Access to Information Act, including, but not limited to:

Policy documents, Account information, Personal Records and Voice recordings

Clients may contact the Helfin office to request access to their own information. Please note that there may be administration fee associated with retrieval of certain types of information records.

8. HOW TO SUBMIT REQUEST FOR ACCESS

Please consider the above before submitting your request. You may proceed to submit a request as follows:

Access to the request forms can be found on our website [Here](#)
(URL to the website: <https://helfin.co.za/information-request/>) .

Alternatively, you can follow the steps below and complete the forms attached to Annexure 1.

8.1 Request form

Please complete the request form in Annexure 1 to this Manual (the "Request Form"). Request must be submitted to marketing@helfin.co.za and michael@helfin.co.za. Sufficient information must be provided for any request to be completed. **Included on the website is the option to Request a deletion, correction, objection, or access to your information.**

8.2 Representatives

Any request done by a representative on behalf of another person must be done with adequate proof of permission to do so and Helfin reserves the right to deny any request should there not be sufficient documentation supporting the request.

ANNEXURE 1:

REQUEST FOR ACCESS TO RECORDS OF PRIVATE BODY

This annexure must accompany the cover letter addressed to the Information Officer

A. Particulars of Helfin Private Wealth

106 Nicolson Street, Brooklyn, Pretoria

Tel: +27 12 346 3001

E-mail: marketing@helfin.co.za

B. Particulars of person requesting access to the record

1. The particulars of the person who requests access to the record must be given below.
2. Application must include proof of permission to act on behalf of requester

Full names and surname:

Identity number: _____

Postal address:

Telephone number: _____

E-mail address: _____

Capacity in which the 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:
