

Last updated:

Helfin Private Wealth (Pty) Limited and Helfin Risk Management (Pty) Limited , Helfin Global Capital (Pty) Ltd (“Helfin”)

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Helfin Private Wealth (Pty) Limited, Helfin Risk Management (Pty) Limited and Helfin Global Capital (Pty) Ltd (“Helfin”) are committed to protecting your privacy and ensuring that your personal information is kept confidential. This privacy policy applies to all Helfin electronic media (which includes our website) and governs data collection, storage and usage. By using Helfin’s electronic media you tacitly consent to the data practices described in this policy, unless expressly directed otherwise by you.. We will only use your personal information as needed and process under

INTERPRETATION AND DEFINITIONS

Interpretation

The words of which the initial letter is capitalized have meanings defined under the following conditions. The following definitions shall have the same meaning regardless of whether they appear in singular or in plural.

Definitions

For the purposes of this Privacy Policy:

- Account means a unique account created for You to access our Service or parts of our Service.
- Company (referred to as either “the Company”, “We”, “Us” or “Our” in this Agreement) refers to Helfin Private Wealth, Helfin Risk Management and Helfin Global Capital, unless the context states otherwise.
- Cookies are small files that are placed on Your computer, mobile device or any other device by a website, containing the details of Your browsing history on that website among its many uses.
- Country refers to: South Africa
- Device means any device that can access the Service such as a computer, a cellphone or a digital tablet.
- Personal Data is any information that relates to an identified or identifiable individual.
- Service refers to the Website.
- Service Provider means any natural or legal person who processes the data on behalf of the Company. It refers to third-party companies or individuals employed by the Company to facilitate the Service, to provide the Service on behalf of the Company, to perform services related to the Service or to assist the Company in analyzing how the Service is used.
- Third-party Social Media Service refers to any website or any social network website through which a User can log in or create an account to use the Service.
- Usage Data refers to data collected automatically, either generated by the use of the Service or from the Service infrastructure itself (for example, the duration of a page visit).
- Website refers to Helfin Financial Services, accessible from www.helfin.co.za
- You means the individual accessing or using the Service, or the company, or other legal entity on behalf of which such individual is accessing or using the Service, as applicable.

COLLECTING AND USING YOUR PERSONAL DATA

Types of Data Collected

Personal Data

While using Our Service, We may ask You to provide Us with certain personally identifiable information that can be used to contact or identify You. Personally identifiable information may include, but is not limited to:

- Email address
- First name and last name
- Phone number
- Address, Province, Postal code, City

Usage Data

Usage Data is collected automatically when using the Service.

Usage Data may include information such as Your Device’s Internet Protocol address (e.g. IP address), browser type, browser version, the pages of our Service that You visit, the time and date of Your visit, the time spent on those pages, unique device identifiers and other diagnostic data.

When You access the Service by or through a mobile device, We may collect certain information automatically, including, but not limited to, the type of mobile device You use, Your mobile device unique ID, the IP address of Your mobile device, Your mobile operating system, the type of mobile Internet browser You use, unique device identifiers and other diagnostic data.

We may also collect information that Your browser sends whenever You visit our Service or when You access the Service by or through a mobile device.

Collection of personal information

Helfin is committed to ensuring that the process of collection, usage, storage and disclosure of clients’ personal information is done with the utmost care to ensure that the information is kept confidential and to uphold the rights of privacy. Information which Helfin collects, include information such as your identity number, email address, name and surname, home/work address or telephone number and possibly anonymous demographic information (which is not unique to you) such as your region, postal code, age, gender, preferences and interests.

Computer hardware and software may also automatically be collected by Helfin (for example your IP address, browser type, domain name etc) used for the operation of the services we render, to sustain the quality of service and to provide general statistics regarding use of Helfin electronic media. Your privacy is important to us and we will not sell, rent or provide your personal information to unauthorised entities or to third parties for their independent use without your implied consent. Please inform us should you wish to have access to the information we share with 3rd parties, and which 3rd parties.

Use of personal information

In order for Helfin to protect the integrity of your personal information and enhance your experience, we may combine all the information that we have about you to compile a profile to respond to your specific needs. Helfin may share aggregated information (for example, demographic data) with its stakeholders and business partners, but it will not disclose your personal information to third parties save with your implied consent or as provided in this privacy statement.

Because Helfin does not wish to make irrelevant offers to its clients, we may use your personal information for marketing and informational purposes and forward the details and/or notifications which we think may be of benefit to you by electronic media.

Please note that Helfin will disclose information when lawfully required to do so and only in good faith:-

- To comply with any relevant legislation and/or any legal process; or
- By any regulatory authority (like the Financial Services Board); or
- To protect and defend the rights of Helfin; or
- To protect the personal safety of Helfin users or of the public.

Helfin does not exercise control over third parties' privacy policies and we do not regulate how third parties may use your personal information should you divulge your information to them. It is best to review the privacy policy of any third party. Helfin will not be held responsible for any representations, warranties or content on any website of any third party (including websites linked to this website).

USE OF COOKIES

Helfin website uses "cookies" to help personalize your online experience. The process of gathering the information as set out herein, uses a technology known as "cookies". For example, if you register with the Helfin website or other electronic services, a cookie helps Helfin to recollect and retrieve your particular information upon the following visits. Cookies are uniquely assigned to you and can only be read by a web server in the domain that issued the cookie to you.

If you do not wish for the information to be collected, your browser should allow the disablement of cookies. Most web browsers automatically accept cookies, but there should be an option to adjust your browser setting to decline cookies. By disabling the cookies, you may not be able to fully experience the interactive features of the Helfin services and/or websites you visit.

Tracking Technologies and Cookies

We use Cookies and similar tracking technologies to track the activity on Our Service and store certain information. Tracking technologies used are beacons, tags, and scripts to collect and track information and to improve and analyze Our Service. The technologies We use may include:

Cookies or Browser Cookies

A cookie is a small file placed on Your Device. You can instruct Your browser to refuse all Cookies or to indicate when a Cookie is being sent. However, if You do not accept Cookies, You may not be able to use some parts of our Service. Unless you have adjusted Your browser setting so that it will refuse Cookies, our Service may use Cookies.

Flash Cookies

Certain features of our Service may use local stored objects (or Flash Cookies) to collect and store information about Your preferences or Your activity on our Service. Flash Cookies are not managed by the same browser settings as those used for Browser Cookies. For more information on how You can delete Flash Cookies, please read "Where can I change the settings for disabling, or deleting local shared objects?" available at https://helpx.adobe.com/flash-player/kb/disable-local-shared-objects-flash.html#main_Where_can_I_change_the_settings_for_disabling__or_deleting_local_shared_objects_

Cookies can be "Persistent" or "Session" Cookies. Persistent Cookies remain on Your personal computer or mobile device when You go offline, while Session Cookies are deleted as soon as You close Your web browser. You can learn more about cookies here: All About Cookies by TermsFeed.

We use both Session and Persistent Cookies for the purposes set out below:

Necessary / Essential Cookies

Type: Session Cookies | **Administered by:** Us

Purpose: These Cookies are essential to provide You with services available through the Website and to enable You to use some of its features. They help to authenticate users and prevent fraudulent use of user accounts. Without these Cookies, the services that You have asked for cannot be provided, and We only use these Cookies to provide You with those services.

Cookies Policy / Notice Acceptance Cookies

Type: Persistent Cookies | **Administered by:** Us

Purpose: These Cookies identify if users have accepted the use of cookies on the Website.

Functionality Cookies

Type: Persistent Cookies | **Administered by:** Us

Purpose: These Cookies allow us to remember choices You make when You use the Website, such as remembering your login details or language preference. The purpose of these Cookies is to provide You with a more personal experience and to avoid You having to re-enter your preferences every time You use the Website.

USE OF YOUR PERSONAL DATA

The Company may use Personal Data for the following purposes:

- To provide and maintain our Service, including to monitor the usage of our Service.
- To manage Your Account: to manage Your registration as a user of the Service. The Personal Data You provide can give You access to different functionalities of the Service that are available to You as a registered user.
- For the performance of a contract: the development, compliance and undertaking of the purchase contract for the products, items or services You have purchased or of any other contract with Us through the Service.

- To contact You: To contact You by email, telephone calls, SMS, or other equivalent forms of electronic communication, such as a mobile application's push notifications regarding updates or informative communications related to the functionalities, products or contracted services, including the security updates, when necessary or reasonable for their implementation.
- To provide You with news, special offers and general information about other goods, services and events which we offer that are similar to those that you have already purchased or enquired about unless You have opted not to receive such information.
- **To manage Your requests:** To attend and manage Your requests to Us.
 - **For business transfers:** We may use Your information to evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of Our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which Personal Data held by Us about our Service users is among the assets transferred.
 - **For other purposes:** We may use Your information for other purposes, such as data analysis, identifying usage trends, determining the effectiveness of our promotional campaigns and to evaluate and improve our Service, products, services, marketing and your experience.
- We may share Your personal information in the following situations:
 - **With Service Providers:** We may share Your personal information with Service Providers to monitor and analyze the use of our Service, to contact You.
 - **For business transfers:** We may share or transfer Your personal information in connection with, or during negotiations of, any merger, sale of Company assets, financing, or acquisition of all or a portion of Our business to another company.
 - **With Affiliates:** We may share Your information with Our affiliates, in which case we will require those affiliates to honor this Privacy Policy. Affiliates include Our parent company and any other subsidiaries, joint venture partners or other companies that We control or that are under common control with Us.
 - **With business partners:** We may share Your information with Our business partners to offer You certain products, services or promotions.
 - **With other users:** when You share personal information or otherwise interact in the public areas with other users, such information may be viewed by all users and may be publicly distributed outside. If You interact with other users or register through a Third-Party Social Media Service, Your contacts on the Third-Party Social Media Service may see Your name, profile, pictures and description of Your activity. Similarly, other users will be able to view descriptions of Your activity, communicate with You and view Your profile.
 - **With Your consent:** We may disclose Your personal information for any other purpose with Your consent.

Retention of Your Personal Data

The Company will retain Your Personal Data only for as long as is necessary for the purposes set out in this Privacy Policy. We will retain and use Your Personal Data to the extent necessary to comply with our legal obligations (for example, if we are required to retain your data to comply with applicable laws), resolve disputes, and enforce our legal agreements and policies.

The Company will also retain Usage Data for internal analysis purposes. Usage Data is generally retained for a shorter period of time, except when this data is used to strengthen the security or to improve the functionality of Our Service, or We are legally obligated to retain this data for longer time periods.

Transfer of Your Personal Data

Your information, including Personal Data, is processed at the Company's operating offices and in any other places where the parties involved in the processing are located. It means that this information may be transferred to – and maintained on – computers located outside of Your state, province, country or other governmental jurisdiction where the data protection laws may differ than those from Your jurisdiction.

Your consent to this Privacy Policy followed by Your submission of such information represents Your agreement to that transfer.

The Company will take all steps reasonably necessary to ensure that Your data is treated securely and in accordance with this Privacy Policy and no transfer of Your Personal Data will take place to an organization or a country unless there are adequate controls in place including the security of Your data and other personal information.

LAW ENFORCEMENT

Under certain circumstances, the Company may be required to disclose Your Personal Data if required to do so by law or in response to valid requests by public authorities (e.g. a court or a government agency).

Other legal requirements

The Company may disclose Your Personal Data in the good faith belief that such action is necessary to:

- Comply with a legal obligation
- Protect and defend the rights or property of the Company
- Prevent or investigate possible wrongdoing in connection with the Service
- Protect the personal safety of Users of the Service or the public
- Protect against legal liability

SECURITY OF PERSONAL INFORMATION

HelFin will always take reasonable steps to secure the personal and biometric information that you choose to provide it with and will protect such information from loss, misuse or unauthorised alteration. We store the valued information in databases that have built-in safeguards to ensure the privacy and confidentiality thereof.

However, by virtue of its nature, HelFin cannot guarantee the security of any information that you transmit to us online and you do so at your own risk. HelFin will make commercially reasonable efforts to respond to your requests to correct any errors in your personal information in a timely manner.

How to access your personal information?

As a data subject you have the right to request access to any of your personal information that we may store. You may request a correction, objection, deletion or access to the information by completing the link here.

CHILDREN'S PRIVACY

Our Service does not address anyone under the age of 13. We do not knowingly collect personally identifiable information from anyone under the age of 13. If You are a parent or guardian and You are aware that Your child has provided Us with Personal Data, please contact Us. If We become aware that We have collected Personal Data from anyone under the age of 13 without verification of parental consent, We take steps to remove that information from Our servers.

If We need to rely on consent as a legal basis for processing Your information and Your country requires consent from a parent, We may require Your parent's consent before We collect and use that information.

LINKS TO OTHER WEBSITES

Our Service may contain links to other websites that are not operated by Us. If You click on a third party link, You will be directed to that third party's site. We strongly advise You to review the Privacy Policy of every site You visit.

We have no control over and assume no responsibility for the content, privacy policies or practices of any third party sites or services.

CHANGES TO THIS POLICY

Helfin may, from time to time, update this policy and a notice will be posted on the Helfin website whenever this policy has undergone material changes. We encourage you to keep updated with the policy and stay informed.

CONTACT INFORMATION

Communication and questions relating to this statement may be sent to elli@helfin.co.za