



Prepared in terms of section 51 of the Promotion of Access to Information Act 2 of 2000 (as amended) | Date of compilation: 23/02/2023

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1. LIST OF ACRONYMS AND ABBREVIATIONS

CEO

Chief Executive Officer

DIO

Deputy Information Officer;

IO

Information Officer

Minister

Minister of Justice and Correctional Services;

PAIA

Promotion of Access to Information Act No. 2 of 2000 as Amended;

POPIA

Protection of Personal Information Act No.4 of 2013

Regulator

Information Regulator; and

Republic

Republic of South Africa.

2. PURPOSE OF PAIA MANUAL

This PAIA Manual is useful for the public to-

- 2.1. check the categories of records held by a body which are available without a person having to submit a formal PAIA request;
- 2.2 have a sufficient understanding of how to make a request for access to a record of the body, by providing a description of the subjects on which the body holds records and the categories of records held on each subject;
- 2.3 know the description of the records of the body which are available in accordance with any other legislation;
- 2.4 access all the relevant contact details of the Information Officer and Deputy Information Officer who will assist the public with the records they intend to access;
- 2.5 know the description of the guide on how to use PAIA, as updated by the Regulator and how to obtain access to it;

- 2.6 know if the body will process 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 know the description of the categories of data subjects and of the information or categories of information relating thereto;
- 2.8 know the recipients or categories of recipients to whom the personal information may be supplied;
- 2.9 know if the body 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 know whether the body has appropriate security measures to ensure the confidentiality, integrity and availability of the personal information which is to be processed.

3. KEY CONTACT DETAILS FOR ACCESS TO INFORMATION OF HELFIN GLOBAL CAPITAL

Chief Information Officer

Name Michael Papageorge
Telephone 012 346 3001
E-mail michael@helfin.co.za

Access to information general contacts

E-mail admin@helfin.co.za

National or Head Office

Postal Address 106 Nicolson Street,
Brooklyn. Pretoria
Physical Address 106 Nicolson Street,
Brooklyn. Pretoria
Telephone 012 346 3001
E-mail admin@helfin.co.za
Website www.helfinglobalcapital.com

4. HOW TO USE PAIA AND HOW TO ACCESS 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 PAIA¹ and section 56 of POPIA²;
 - 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 11³; and
 - 4.3.3.2. Access to a record of a private body contemplated in section 50⁴.
 - 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 14⁵ and 51⁶ 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 15⁷ and 52⁸ providing for the voluntary disclosure of categories of records by a public body and private body, respectively;
- 4.3.9. The notices issued in terms of sections 22⁹ and 54¹⁰ regarding fees to be paid in relation to requests for access; and
- 4.3.10. The regulations made in terms of section 92¹¹
- 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 working 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://inforegulator.org.za/>).

¹Section 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.

² 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.

³ 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.

⁴Section 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

⁵ 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.

⁶ 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.

⁷ 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.

⁸ 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

⁹ 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.

¹⁰ 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.

¹¹ 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. REQUEST FOR ACCESS TO RECORDS

5.1. How to Request Access to Records

5.1.1. Any person who wishes to access records held by Helfin Global Capital must comply with the procedural requirements set out in PAIA. The request must be made using the prescribed form and submitted to the Information Officer.

5.2. Request Forms

5.2.1. A requester must complete Form 2 (for requests in terms of section 53 of PAIA) which is available:

5.2.1.1. On the Helfin Financial Services website:
www.helfinglobalcapital.com;

5.2.1.2. At the Head Office: 106 Nicolson Street, Brooklyn, Pretoria;

5.2.1.3. On the Information Regulator's website:
<https://info regulator.org.za>;

5.2.1.4. Upon request from the Information Officer via email:
michael@helfin.co.za.

5.2.2. The completed form must be submitted to the Information Officer by:

5.2.2.1. Email: michael@helfin.co.za or admin@helfin.co.za;

5.2.2.2. Hand delivery: 106 Nicolson Street, Brooklyn, Pretoria;

5.2.2.3. Post: 106 Nicolson Street, Brooklyn, Pretoria.

5.3. Requirements for Valid Requests

A request for access to information must:

5.3.1. Be made on the prescribed Form 2;

5.3.2. Be addressed to the Information Officer;

5.3.3. Provide sufficient detail to enable the Information Officer to identify:

5.3.3.1. The record(s) requested;

5.3.3.2. The requester (full names and contact details and Identity document);

5.3.3.3. The form of access required (inspection, copy, transcript, etc.);

5.3.4. Identify the right the requester is seeking to exercise or protect and provide an explanation of why the requested record is required for the exercise or protection of that right;

5.3.5. Specify the requester's preferred language if the record is available in multiple languages;

5.3.6. Indicate the requester's preferred manner of access (if the record is available in different forms);

5.3.7. Include a postal address, fax number, or email address of the requester in the Republic; and

5.3.8. Identify the capacity in which the request is made (personal requester, on behalf of another person, or acting on behalf of a juristic person).

5.4. Request Fees

5.4.1. The requester must complete the prescribed form and deposit the request fee of R 140.00.

5.4.2. The account details are available upon request.

5.4.3. Please attach proof of payment to the request form.

5.5. Prescribed Access Fees

| ITEM DESCRIPTION | AMOUNT |
|--|--|
| The request fee payable by every requester | R 140.00 |
| Photocopy/printed black and white copy of A4-size page | R 2.00 per page or part of the page |
| For a copy in a computer-readable form on a: flash drive (provided by requester) CD (provided by requester) | R 40.00 R 40.00 |
| CD (provided by us) | R 60.00 |
| Transcription of visual images per A4-size page | This service will be outsourced. The fee will depend on the quotation from the service provider |
| Copy of visual images | This service will be outsourced. The fee will depend on the quotation from the service provider. |
| Transcription of an audio record, per A4-size page | R 24.00 |
| Copy of an audio record on a: flash drive (provided by requester) CD (provided by requester) CD (provided by us) | R 40.00 R 40.00 R 60.00 |
| To search for any 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 R 435.00 | R 145.00 |
| Deposit: if search exceeds 6 hours | One-third of the amount per request. It is calculated in terms of items 2 to 8 above |
| Postage, email, or any other electronic transfer | Actual expense, if any |

5.5.1. You may be requested to pay a deposit for the access fee depending on the time and effort to retrieve records as well as manner of access.

5.5.2. Access will not be granted without payment of the access fee.

6. GROUNDS FOR HELFIN TO REFUSE ACCESS TO AN INFORMATION RECORD

- 6.1. We may refuse you access to certain information in terms of PAIA to protect: Someone else’s privacy;
 - 6.1.1. Another organisation’s commercial information;
 - 6.1.2. Someone else’s confidential information;
 - 6.1.3. Research information;
 - 6.1.4. The safety of individuals and property; or
 - 6.1.5. Records privileged from production in legal proceedings.
- 6.2. We will notify you in writing if your request has been approved or denied, within 30 calendar days, after assessing your request. If we cannot find the record you asked for or it does not exist, we will notify you by way of affidavit that it is not possible to give you access to that record and the reasons for such refusal.

7. CATEGORIES OF RECORDS OF HELFIN WHICH ARE AVAILABLE WITHOUT A PERSON HAVING TO REQUEST INFORMATION

| CATEGORY OF RECORD | TYPE OF RECORDS | AVAILABLE ON WEBSITE | AVAILABLE UPON REQUEST |
|----------------------|--|----------------------|------------------------|
| Personal information | Clients can request their personal information that is on the client file | | X |
| Compliance documents | PAIA Manual; Complaints Process; BEE Certificate; Disclosures; Conflict of Interest Policy; Privacy Policy | X | |

8. RECORDS OF WHICH ARE AVAILABLE IN ACCORDANCE WITH ANY OTHER LEGISLATION

In compliance with other legislation, Helfin allows access to records as prescribed in the applicable legislation and different to the PAIA process. The below listed are some of the laws and is not exhaustive.

- 8.1. Financial Advisory and Intermediary Services Act 37 of 2002;
- 8.2. Financial Sector Regulations Act 09 of 2017;
- 8.3. Promotion of Access to Information Act 2 of 2000;
- 8.4. Protection of Personal Information Act 4 of 2013;
- 8.5. Financial Intelligence Centre Act 38 of 2001;
- 8.6. Companies Act 71 of 2008;
- 8.7. Basic Conditions of Employment Act 75 of 1997;
- 8.8. Employment Equity Act 55 of 1998;
- 8.9. Labour Relations Act 66 of 1995;
- 8.10. Insurance Act 18 of 2017;
- 8.11. Long-term Insurance Act 52 of 1998; and
- 8.12. Short-term Insurance Act 53 of 1998.

9. CATEGORIES OF RECORDS HELD ON EACH SUBJECT BY HELFIN

| SUBJECTS ON WHICH HELFIN HOLDS RECORDS | CATEGORIES OF RECORDS |
|--|--|
| Company | Annual Reports; Strategic Plans; Business Process Records; Financial Records; Insurance Records; Tax Records |
| Employees | HR Policies and Procedures; Advertised Posts; Employee Records |
| Customers | Customer Details; Customer Complaints; Products and Services |
| Third Parties | Supplier Agreements; Policies and Procedures; Supplier Details |

10. PROCESSING OF PERSONAL INFORMATION

10.1. Purpose of Processing Personal Information

Helfin processes personal information for the following purposes:

- 10.1.1. To perform statutory and regulatory reporting obligations;
- 10.1.2. To provide products and/or services to clients and customers;
- 10.1.3. To verify the identity of clients, service providers, and employees;
- 10.1.4. To facilitate contractual relationships, including payments, invoicing, and account management;

- 10.1.5. For human resource management, including recruitment, training, payroll, performance management, and employment equity reporting;
- 10.1.6. To comply with the provisions of applicable legislation, including the Financial Intelligence Centre Act (FICA), the Financial Advisory and Intermediary Services Act (FAIS), the Companies Act, and the POPIA;
- 10.1.7. For audit, record keeping, and business continuity purposes; and
- 10.1.8. To protect the legitimate interests of the organisation, its clients, service providers, and employees.

10.2. Description of the categories of data subjects and of the information or categories of information relating thereto

| CATEGORIES OF DATA SUBJECTS | PERSONAL INFORMATION THAT MAY BE PROCESSED |
|-----------------------------|--|
| Customers/Clients | Name; surname; identity/passport number; registration number (where juristic); contact details (address, email, telephone); financial and banking details; tax information; employment details; investment preferences; risk profiles; and supporting documentation required for FICA and contractual purposes |
| Service Providers/Suppliers | Name of business or individual; registration number; VAT number; contact details; address; banking details; B-BBEE certification; and contractual information |
| Employees/Job Applicants | Name; surname; contact details; residential address; identity number; qualifications; employment history; financial information (for payroll); banking details; gender; race; next of kin details; medical aid and pension fund details (if applicable); performance evaluations; and disciplinary records |

10.3. Recipients with whom personal information may be shared

| CATEGORIES OF PERSONAL INFORMATION | RECIPIENTS OR CATEGORIES OF RECIPIENTS |
|--|---|
| Customers / Clients – Name; surname; identity/passport number; registration number; contact details; financial and banking details; tax information; employment details; risk profiles | <ul style="list-style-type: none"> • Regulatory and supervisory authorities (FSCA, SARS, FIC, Information Regulator); • Financial institutions and product providers; • Professional advisors (auditors, attorneys, compliance officers); • Service providers (IT, cloud storage, data processing); and • Law enforcement agencies (SAPS, Courts). |

| | |
|--|--|
| Service Providers / Suppliers – Name; registration number; VAT number; contact details; banking details; contractual information | <ul style="list-style-type: none"> • Regulatory authorities (SARS, FSCA if applicable); • Internal departments for procurement and finance; • Professional advisors (auditors, legal advisors); and • Financial institutions (for payment processing). |
| Employees / Job Applicants – Name; contact details; residential address; identity number; qualifications; employment history; banking details; gender; race; next of kin details | <ul style="list-style-type: none"> • Statutory bodies (Department of Labour, SARS, Compensation Fund, UIF); • Payroll administrators and pension/provident fund administrators; • Medical aid schemes (if applicable); • Professional advisors (auditors, attorneys, HR consultants); • Law enforcement agencies (where required by law); and • South African Qualifications Authority (SAQA). |
| General Business Records – Policies; procedures; contracts; correspondence; internal reports; meeting records | <ul style="list-style-type: none"> • Courts and tribunals (for dispute resolution or litigation); • Regulators and statutory bodies (as required by law); • Professional advisors (legal, compliance, audit, risk management); and • Business partners or counterparties where disclosure is contractually required. |

10.4. Planned transborder flows of personal information

Currently all information is stored locally.

10.5. Information Security Measures

HelFin implements appropriate technical and organisational measures to ensure the confidentiality, integrity, and availability of personal information, including:

- 10.5.1. Anti-virus and malware protection. All computers and networked devices are protected with up-to-date anti-virus and anti-malware software.
- 10.5.2. Data encryption. Personal information and sensitive documents are encrypted when stored or transmitted electronically.
- 10.5.3. Access controls. Access to personal information is restricted to authorised personnel only, using secure login credentials and role-based access rights.
- 10.5.4. Secure storage. All records are stored in secure locations to prevent unauthorised access, loss, or damage.

10.5.5. Backup and recovery. Regular backups are performed, and disaster recovery measures are in place to ensure data availability in case of system failure or data loss.

10.5.6. Staff awareness and training. Employees are trained on the importance of information security, including handling, sharing, and storing personal information in compliance with applicable legislation.

11. AVAILABILITY OF THE MANUAL

- 11.1. A copy of the Manual is available:
 - 11.1.1. On www.helfin.co.za;
 - 11.1.2. Head office of Helfin Financial Services Group, at 106 Nicolson Street, Brooklyn, Pretoria, for public inspection during normal business hours;
 - 11.1.3. To any person upon request and upon the payment of a reasonable prescribed fee; and
 - 11.1.4. To the Information Regulator upon request.
- 11.2. A fee for a copy of the Manual, as contemplated in annexure B of the Regulations, shall be payable per each A4-size photocopy made.

12. COMPLAINT TO THE INFORMATION REGULATOR

- 12.1. If the requester or third party is aggrieved by the decision of the Information Officer, he or she may lodge a written complaint with the Information Regulator; or
- 12.2. By way of an application and within 180 days, apply to a court for appropriate relief in terms of section 82 of PAIA.
- 12.3. The Regulator can be contacted as per below:

| | |
|---|--|
| INFORMATION REGULATOR WEBSITE | https://infoeregulator.org.za/ |
| ADDRESS | Woodmead North Office Park, 54 Maxwell Drive Woodmead, Johannesburg, 2191 |
| TELEPHONE | 010 023 5200 |
| GENERAL ENQUIRY EMAIL | enquiries@infoeregulator.org.za |
| COMPLAINTS EMAIL (RELATING TO ACCESS OF INFORMATION) | PAIAComplaints@infoeregulator.org.za |
| COMPLAINTS EMAIL (RELATING TO PERSONAL INFORMATION) | POPIAComplaints@infoeregulator.org.za |

13. UPDATING OF THE MANUAL

The Directors of Helfin Global Capital will on a regular basis, but at least annually, update this manual.

Issued by:

Michael papageorge

Michael Papageorge

Director and Key Individual

| VERSION | DESCRIPTION | DATE |
|---------|---------------|------------|
| V2 | Annual Review | 2025-12-12 |
| | | |
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