HISEC WEALTH AND FINANCIAL SERVICES (PTY) LTD

POPIA POLICY AND COMPLIANCE FRAMEWORK

POPIA Policy statement and compliance framework in respect of Protection of Personal Information and the Retention of Documents for **Hisec Wealth and Financial Services (Pty) Ltd (FSP number: 10960).**

Version number: v3.0
Updated: 20/10/2025

Protection of Personal Information Act, 4 Of 2013 POPI Policy

1. INTRODUCTION

Hisec Wealth and Financial Services (Pty) Ltd is a company functioning within the financial services sector, that is obligated to comply with the Protection of Personal Information Act 4 of 2013 (POPIA). POPIA requires this business to inform its clients as to the manner in which their personal information is used, disclosed and destroyed.

Hisec Wealth and Financial Services (Pty) Ltd is committed to protecting its clients' privacy and ensuring that their personal information is used appropriately, transparently, securely and in accordance with applicable laws. The Policy sets out the manner in which the business deals with clients' personal information and also stipulates the purpose for which such information will be used.

2. PERSONAL INFORMATION COLLECTED

2.1 **Requirement: Section 9 of POPIA states that "*Personal Information may only be processed if, given the purpose for which it is processed, it is adequate, relevant and not excessive.*"**

2.1.1 **Hisec Wealth and Financial Services (Pty) Ltd** collects and processes clients' personal information pertaining to each client's financial needs. For purposes of this Policy, clients include potential and existing clients. The type of information will depend on the need for which it is collected and will be processed for that purpose only.

2.1.2 Whenever possible, the client will be informed as to the information required and the information which is deemed optional. Examples of personal information we collect include, but are not limited to:

2.1.2.1 The client's Identity and passport numbers/documents, full names, surname, postal and physical address, gender, marital status, and number of dependants.

2.1.2.2 Description of the client's, business, assets; liabilities; financial information, tax number, banking details, etc.

2.1.2.3 Any other information required by Hisec Wealth and Financial Services (Pty) Ltd, its contracted suppliers, insurers and underwriting managers in order to provide each client with an accurate analysis and assessment of his/her financial needs.

2.1.2.4 Hisec Wealth and Financial Services (Pty) Ltd does not collect or processes the client's personal information for marketing purposes.

2.1.2.5 Hisec Wealth and Financial Services (Pty) Ltd strives to have written agreements in place with all product suppliers, insurers and third-party service providers to ensure a mutual understanding with regard to the protection of the client's personal information.

2.1.2.6 Hisec Wealth and Financial Services (Pty) Ltd 's suppliers will be subject to the same regulations as applicable to Hisec Wealth and Financial Services (Pty) Ltd .

3. THE USAGE OF PERSONAL INFORMATION

3.1 The Client's Personal Information will only be used for the purpose for which it was collected and as agreed, and with the client's written consent. This may include:

3.1.1 Providing products or services to clients and to carry out the transactions requested;
3.1.2 For underwriting purposes;
3.1.3 Collating, assessing and processing claims;
3.1.4 Confirming, verifying and updating clients' details;
3.1.5 For purposes of claims history;
3.1.6 For the detection and prevention of fraud, crime, money laundering or other malpractices;
3.1.7 For audit and record keeping purposes;
3.1.8 Providing services to clients, to render the services requested and to maintain and constantly improve the relationship;
3.1.9 Providing communication, the financial services industry and other regulatory matters that may affect clients; and

3.1.10 In connection with and to comply with legal and regulatory requirements or when it is otherwise allowed by law.

3.2 According to section 10 of POPIA, personal information may only be processed if certain conditions, listed below, are met along with supporting information for **Hisec Wealth and Financial Services (Pty) Ltd** 's processing of Personal Information:

3.2.1 The client has consented to the processing: - consent to be obtained from clients;

3.2.2 The necessity of processing in order to conduct an accurate analysis of the client's needs;

3.2.3 Processing complies with an obligation imposed by law or a contractual obligation;

3.2.4 The Financial Advisory and Intermediary Services Act ('FAISA') requires Financial Service Providers ('FSPs') to conduct a needs analysis and obtain information from clients about their needs in order to provide them with applicable and beneficial products;

3.2.5 Processing protects a legitimate interest of the client- it is in the client's best interest to have full and proper needs analysis performed in order to provide the client with an applicable and beneficial product or service;

3.2.6 Processing is necessary for pursuing the legitimate interests of Hisec Wealth and Financial Services (Pty) Ltd or of a third party to whom information is supplied — in order to provide clients with products and or services both this FSP and any of our product suppliers require certain personal information from the clients in order to make an expert decision on the unique and specific product and or service required.

4. DISCLOSURE OF PERSONAL INFORMATION

4.1 **Hisec Wealth and Financial Services (Pty) Ltd may:**

4.1.1 Not disclose a client's personal information to any product or third-party service provider/s where no agreements are in place to ensure that there is compliance with confidentiality and privacy conditions.

4.1.2 Disclose a client’s information where it has a duty or a right to disclose in terms of applicable legislation, the law, or where it may be deemed necessary in order to protect its rights.

4.1.3 Share client personal information with; and obtain information about clients from third parties for the reasons already discussed above.

5. SAFEGUARDING CLIENT INFORMATION

5.1 It is a requirement of the POPIA to adequately protect personal information. **Hisec Wealth and Financial Services (Pty) Ltd** will continuously review its security controls and processes to ensure that personal information of our clients is at all times secure. This clause goes in conjunction with Hisec Wealth and Financial Services (Pty) Ltd 's **Security Policy**.

6. CLIENT INFORMATION SAFEGUARDING AND SECURITY

6.1 Archived client information is stored off site by **atWORK Internet Software Solutions (Pty) Ltd**, **Reg. No.: 2001/013302/07 & Microsoft** which entity is also governed by POPI, access to retrieve information is limited to authorised personal.

6.2 We have outsourced our Customer Due Diligence (CDD) record keeping to **eas-e Fica (Pty) Ltd**, **Reg. No.: 2013/224536/07**, as a third party. To ensure the maintenance of records for the requisite periods, and in terms of our service level agreement with them, neither they nor us will destroy any records unless given an instruction to do so. We record that the eas-e Fica system contains a facility whereby we can render clients inactive. When we do so, the system will automatically preserve each client record but will not perform reverifications. All data will automatically be permanently deleted from the eas-e Fica system, exactly five years from the date on which the client has been rendered inactive. It is the duty of the representative who last acted for that client, to render the client inactive on the system.

6.3 All current electronic files or data are backed up by **RITO Technologies (Pty) Ltd, Reg No.: 2007/0923/32,** which is also responsible for Hisec Wealth and Financial Services (Pty) Ltd 's security systems, that protects third party access and physical threats.

6.4 All product suppliers, insurers and other third-party service providers will be required to sign a service level agreement guaranteeing their commitment to the Protection of Personal Information; this is however an ongoing process that will be evaluated as needed.

6.5 This clause is in conjunction with Hisec Wealth and Financial Services (Pty) Ltd 's **Security Policy; Confidentiality Policy; and Operational Ability Document.**

6.6 The Information Officer appointed for Hisec Wealth and Financial Services (Pty) Ltd, in terms of section 55. (2) of POPIA is **JOHANNES CHRISTIAN PRETORIUS** (ID: 5403015011084), whose details are available below and who is responsible for the compliance with the conditions of the lawful processing of personal information and other provisions of POPIA.
Postal Address: PO Box 334, Ruimsig, 1732
Tel: +27 11 958 0117
Email: chris@hisec.co.za / wealth@hisec.co.za

7. ACCESS TO AND CORRECTION OF PERSONAL INFORMATION

7.1 All Clients have the right to access the personal information that **Hisec Wealth and Financial Services (Pty) Ltd** holds about them. Clients also have the right to ask to update, correct or delete their personal information on reasonable grounds.

7.1.1 Once a client objects to the processing of their personal information have been received and upheld, **Hisec Wealth and Financial Services (Pty) Ltd shall**:

7.1.1.1 Cease processing the relevant personal information, except where continued processing is permitted or required by law;
7.1.1.2 Take all reasonable steps to verify the identity of the client before disclosing or amending any personal information; and
7.1.1.3 Act in accordance with all applicable legislative requirements.

8. AMENDMENTS TO THIS POLICY

8.1 Amendments to, or a review of this Policy, will take place on an ad hoc basis as circumstances dictate. Where material changes take place, clients will be notified directly, or changes will be stipulated on the **Hisec Group** website (https://www.hisec.co.za)

9. POLICY ON THE RETENTION & CONFIDENTIALITY OF DOCUMENTS, INFORMATION AND ELECTRONIC TRANSACTIONS

9.1 **Purpose:** To exercise effective control over the retention of documents and electronic transactions as:
9.1.1 Prescribed by legislation; and
9.1.2 Dictated by business practice.

9.2 Documents need to be retained in order to prove the existence of facts and to exercise rights the FSP may have. Documents are also necessary for defending legal action, for establishing what was said or done in relation to business conducted and to minimize reputational and compliance risks. There is also the need to ensure that **Hisec Wealth and Financial Services (Pty) Ltd** 's interests are protected and that own and clients' rights to privacy and confidentiality are not breached.

10. ACCESS TO DOCUMENTS

10.1 All **Hisec Wealth and Financial Services (Pty) Ltd** and client information must be dealt with in the strictest confidence and may only be disclosed, without fear of redress, in the following circumstances:

10.1.1 Where disclosure is under compulsion of law;
10.1.2 Where there is a duty to the public to disclose;
10.1.3 Where the interests of the Company require disclosure; and
10.1.4 Where disclosure is made with the express or implied consent of the client.

11. DISCLOSURE TO 3RD PARTIES

11.1 All employees have a duty of confidentiality in relation to information relating to our business and its clients.

11.2 Information on clients: Our clients' right to confidentiality is protected in the Constitution and in terms of ECTA. Information may be given to a 3rd party if the client has consented in writing to that person receiving the information.

11.3 **Requests for company information:** These are dealt with in terms of PAIA, which gives effect to the constitutional right of access to information held by the State or any person (natural and juristic) that is required for the exercise or protection of rights. Private bodies, like the FSP, must however refuse access to records if disclosure would constitute an action for breach of the duty of secrecy owed to a third party. In terms hereof, requests must be made in writing on the prescribed form to the Information Officer in terms of PAIA. The requesting party has to state the reason for wanting the information and has to pay a prescribed fee. The FSP's manual in terms of PAIA will be made available on request to clients who seek it.

11.4 Confidential company and/or business information may not be disclosed to third parties as this could constitute industrial espionage. The affairs of the Company must be kept strictly confidential at all times.

11.5 **Hisec Wealth and Financial Services (Pty) Ltd** views any contravention of this policy very seriously and employees who are guilty of contravening the policy will be subject to disciplinary procedures, which may lead to the dismissal of any guilty party.

12. RECORD KEEPING AND DESTRUCTION

12.1 **Requirement: Financial Advisory and Intermediary Services Act, No 37 of 2002** and **FIC Act (Financial Intelligence Centre Act, No. 38 of 2001).**

12.1.1 All documents and records relating to each client ("client information"), with whom a transaction was concluded must be maintained and kept in safe custody (protected against destruction and in accordance with data privacy rules) for a period of 5 years from date of conclusion of the transaction or the date on which the relationship with the client was terminated, whichever occurs the last.

12.1.2 Under data privacy legislation, we are further obliged to ensure the earliest reasonable destruction of confidential client information after expiry of the compulsory record keeping periods. It is therefore not necessary for electronic copies to be kept indefinitely – they, together with the hard copies may be destroyed.

12.1.3 Due to the nature of our business, it may be necessary to retain client records for longer than the standard five-year period following termination of the relationship. This extended retention is to protect the rights and interests of Hisec Wealth and Financial Services (Pty) Ltd, particularly in instances where clients may approach the relevant Ombud with complaints or claims regarding past services rendered. Retaining such documentation is essential to substantiate facts, defend potential legal action, demonstrate historical business conduct, and reduce reputational and compliance risks. At all times, the retention and handling of client information will be done with due regard to the privacy and confidentiality rights of our clients, and in compliance with applicable legal and regulatory obligations.

12.2 **The documentation required to be kept is as follows:**

12.2.1 Simplified Due Diligence (SDD), Customer Due Diligence (CDD) and Enhanced Due Diligence (EDD) records including risk rating.

12.2.2 Transaction monitoring records.

12.2.3 Record of remedial actions, results and other mitigating activities.

12.2.4 Details of the transactions entered into, i.e. dates, nature of transaction, amounts paid.

12.2.5 Outsourced record keeping.

12.3 **Outsources Record Keeping**

12.3.1 Archived client information is stored off site by atWORK Internet Software Solutions (Pty) Ltd, Reg. No.: 2001/013302/07 & Microsoft which entity is also governed by POPI, access to retrieve information is limited to authorised personal.

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12.3.4 All product suppliers, insurers and other third-party service providers will be required to sign a service level agreement guaranteeing their commitment to the Protection of Personal Information; this is however an ongoing process that will be evaluated as needed.

12.4 **Single Client View**

12.4.1 It is a requirement that existing client records must be available in the event that a new/different transaction or business relationship is entered into, with that client. This requirement facilitates improved risk management and risk assessment of the client and each transaction. In particular, the Simplified Due Diligence (SDD) and Customer Due Diligence (CDD) aspects, relating to a better understanding of the client's business and the products and services availed must, if necessary, be updated with every new transaction and/or relationship and a new risk score compiled. In all respects, the procedures as prescribed herein must be adopted where appropriate.

12.4.2 To ensure that this requirement is met, we shall, on the eas-e Fica system maintain a list of all clients, identifiable by their identity numbers only. When an representative engages with a prospective client, then the representative shall conduct a search against the list maintained and shall, in the event that the client is already a client of ours, continue to work on the current client file in respect of Customer Due Diligence (CDD) for purposes of this act.

13. REVIEW OF POLICY AND COMPLIANCE FRAMEWORK

This policy, manual and compliance framework will be reviewed and amended whenever there is a change to legislation governing the POPI Act, or when it is required to amend a procedure to make it more effective.

POLICY AND PROCEDURES VERSION v3.0
POLICY CREATED: 29/06/2021
POLICY REVISED: 18/06/2024
POLICY REVISED: 20/10/2025

Policy approved and adopted by Director / Key Individual: **Johannes Christian Pretorius**

Signature: JJ Pretorius ____________________

Policy approved and adopted by Information officer: **Johannes Christian Pretorius**

Signature: JJ Pretorius ____________________