

## DATA PRIVACY POLICY

**EFFECTIVE DATE: 15 MAY 2026**

**LAST UPDATED: 15 MAY 2026**

**VERSION: 1**

### 1. Introduction

Elysian Compliance & Risk Management Pty Ltd (“Elysian”, “we”, “our”, or “us”) is committed to protecting your privacy and ensuring that your personal information is processed lawfully, transparently, and securely in accordance with applicable South African legislation, including:

- Protection of Personal Information Act 4 of 2013 (“POPIA”)
- Promotion of Access to Information Act 2 of 2000 (“PAIA”)
- Electronic Communications and Transactions Act 25 of 2002 (“ECTA”)

This Privacy Policy explains how we collect, use, disclose, store, and protect your personal information when you access or use our website, application, products, or services.

### 2. Definitions

For purposes of this Privacy Policy:

- **“Personal Information”** has the meaning assigned in section 1 of POPIA.
- **“Processing”** means any operation or activity concerning personal information as contemplated in section 1 of POPIA.
- **“Data Subject”** means the person to whom personal information relates.
- **“Operator”** means a person or entity processing personal information on behalf of a responsible party.
- **“Responsible Party”** means the entity determining the purpose and means of processing personal information.

### 3. Information We Collect

We may collect and process the following categories of personal information:

- Full names and surnames
- Identity or passport numbers

- Company registration information
- Contact details
- Email addresses
- Telephone numbers
- Residential and business addresses
- Financial and banking information
- Device and browser information
- IP addresses
- Usage analytics and cookies
- Transaction records
- Employment information
- Communication history

<sup>1</sup>We may also process special personal information where permitted by law.

## 4. Sources of Personal Information

<sup>2</sup>We may collect personal information:

### 4.1 Directly From You

When you:

- register an account;
- use our services;
- complete forms;
- communicate with us; or
- participate in promotions or surveys.

### 4.2 Automatically Through Technology

Through:

- cookies;
- analytics tools;
- browser data;
- website interaction tracking; and
- device identifiers.

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<sup>1</sup> POPIA sections 8-25 & sections 26-33

<sup>2</sup> POPIA sections 18 & 13

### 4.3 From Third Parties

Including:

- regulators;
- public records;
- service providers;
- payment processors;
- credit bureaus;
- business partners; and
- identity verification providers.

## 5. Purpose of Processing Personal Information

<sup>3</sup>We process personal information for lawful and specific purposes, including:

- providing products and services;
- account management;
- identity verification;
- transaction processing;
- customer support;
- responding to enquiries;
- fraud prevention;
- risk management;
- compliance with legal obligations;
- research and analytics;
- marketing communications;
- maintaining platform security; and
- enforcing agreements.

## 6. Lawful Basis for Processing

<sup>4</sup>We process personal information where:

- consent has been obtained;
- processing is necessary to perform a contract;
- processing complies with legal obligations;

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<sup>3</sup> POPIA sections 11 & 13 & 15

<sup>4</sup> POPIA sections 11

- processing protects legitimate interests;
- processing is necessary for pursuing legitimate business interests; or
- processing is necessary to provide requested services.

## 7. <sup>5</sup>Consent

Where consent is required for processing, Elysian will obtain voluntary, specific, and informed consent from the data subject.

Data subjects may withdraw consent at any time, subject to applicable legal or contractual limitations.

## 8. <sup>6</sup>Marketing Communications

Elysian may send direct marketing communications where permitted by law.

All marketing communications will provide an option to opt out or unsubscribe.

We will not send unsolicited electronic communications contrary to applicable legislation.

## 9. Automated Decision-Making

<sup>7</sup>Elysian may use automated processing to:

- assess applications;
- detect fraud;
- monitor risk; and
- improve service delivery.

Data subjects may request reconsideration of automated decisions where applicable.

## 10. Disclosure and Sharing of Personal Information

<sup>8</sup>We may disclose personal information to:

- employees;
- operators and service providers;
- payment processors;
- cloud hosting providers;
- regulators;
- auditors;
- legal advisors; and

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<sup>5</sup> POPIA sections 11(1)(a) and section 69

<sup>6</sup> POPIA sections 69 and ECTA section 45

<sup>7</sup> POPIA sections 71

<sup>8</sup> POPIA sections 20 & 21

- authorities where required by law.

Personal information will only be disclosed:

- with consent;
- where required by law;
- pursuant to a court order;
- to protect rights or safety; or
- where necessary to provide services.

Operators processing information on behalf of Elysian are required to implement appropriate security and confidentiality measures.

## 11. Cross-Border Transfers

<sup>9</sup>Personal information may be transferred outside South Africa where:

- the recipient is subject to laws or agreements providing adequate protection;
- the data subject consents to the transfer; or
- the transfer is otherwise lawful under POPIA.

## 12. Security Safeguards

<sup>10</sup>Elysian implements appropriate technical and organisational measures to protect personal information against:

- loss;
- damage;
- unauthorised access;
- destruction;
- disclosure; and
- unlawful processing.

Security measures may include:

- encryption;
- firewalls;
- access controls;
- authentication systems; and
- secure infrastructure.

Where a security compromise occurs, affected persons and the Information Regulator will be notified where legally required.

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<sup>9</sup> POPIA sections 72

<sup>10</sup> POPIA sections 19, 20, 21, and 22

### **13. Retention of Personal Information**

<sup>11</sup>Personal information will only be retained for as long as necessary to:

- fulfil the purpose collected;
- comply with legal obligations;
- resolve disputes;
- enforce agreements; or
- conduct lawful business activities.

Information may be retained longer where legally required or permitted.

### **14. Data Subject Rights**

<sup>12</sup>Subject to applicable law, data subjects may exercise the following rights:

- Right of access to personal information
- Right to correction or deletion
- Right to object to processing
- Right to withdraw consent
- Right to object to direct marketing
- Right to lodge complaints with the Information Regulator

Requests may be submitted to the Information Officer.

### **15. Cookies and Website Analytics**

<sup>13</sup>Elysian may use cookies and similar technologies to:

- improve functionality;
- analyse website usage;
- personalise user experiences; and
- maintain security.

Users may disable cookies through browser settings, although this may limit functionality.

### **16. Third-Party Websites**

Our website or services may contain links to third-party websites or platforms.

Elysian is not responsible for the privacy practices, content, or security of third-party services.

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<sup>11</sup> POPIA sections 14

<sup>12</sup> POPIA sections 23, 24, 11(3), and 69

<sup>13</sup> POPIA sections 18 and ECTA section 43

## 17. Children's Privacy

<sup>14</sup>Elysian does not knowingly collect personal information from children unless permitted by law or with the consent of a competent person.

## 18. PAIA Manual

<sup>15</sup>Elysian maintains a PAIA Manual in accordance with section 51 of PAIA.

The PAIA Manual contains:

- categories of records held;
- procedures for requesting access;
- prescribed fees; and
- Information Officer details.

## 19. Information Regulator

<sup>16</sup>Complaints relating to personal information may be submitted to:

### Information Regulator (South Africa)

JD House  
27 Stiemens Street  
Braamfontein  
Johannesburg  
2001

Telephone: +27 (0)10 023 5200

Email: [enquiries@info regulator.org.za](mailto:enquiries@info regulator.org.za)

Website: <https://info regulator.org.za/>

## 20. Amendments to this Privacy Policy

<sup>17</sup>Elysian reserves the right to amend this Privacy Policy from time to time.

Updated versions will be published on our website or platform and will become effective upon publication.

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<sup>14</sup> POPIA sections 34 - 35

<sup>15</sup> POPIA sections 51 and 54

<sup>16</sup> POPIA sections 74

<sup>17</sup> POPIA sections 18

## 21. <sup>18</sup>Contact Details

CIO: Mariska van der Veen

DIO: Philicia Robinson

Postal address: Same as physical address

Physical Address: 54 Colonial Blvd, 34 Manie Road, Rietvalleirand, Pretoria, South Africa, 0181

Email: [info@elysiancrm.com](mailto:info@elysiancrm.com)

Website: [www.elysiancrm.com](http://www.elysiancrm.com)

## 22. Policy Revision and Version Control

All amendments, additions, or updates to this policy are recorded in the version control register below. To ensure ongoing compliance and relevance, the policy will be **formally reviewed at least once per annum**, or **earlier** if any of the following occur:

- **Statutory or regulatory changes** that impact obligations under FAIS, FSCA Conduct Standards, POPIA, or related legislation.
- **Material changes** to organisational structure, product suite, or complaint-handling processes.
- **Audit or assurance findings** indicating that revisions are required to maintain effectiveness.
- **Regulatory guidance or directives** issued by the FSCA, SARB, or other competent authorities.

Interim reviews may be initiated by the **Compliance Function** or **Executive Management** whenever emerging risks, new legislation, or operational developments warrant an update.

DATE	VERSION	CHANGES	APPROVED BY BOARD OF DIRECTORS
15 May 2026	Ve.1.0.2026	First Version	15/05/2026

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<sup>18</sup> POPIA sections 55 and 56