CaEFT

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CaEFT (Pty) Ltd

Registration Number: 2021/969009/07

PRIVACY POLICY
Version: 1.0
Effective Date: 1/02/2026
Last Updated: 1/02/2026

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1. INTRODUCTION

1.1 Who we are

CaEFT Proprietary Limited (Reg. No. 2021/969009/07) (“CaEFT”, “we”, “us”, “our”) is a private company incorporated in the Republic of South Africa. We provide payment processing and client management services to our clients.

1.2 Purpose of this Policy

This Privacy Policy (“Policy”) explains how we collect, use, store, share and protect Personal Information when you interact with us, use our services, visit our websites or otherwise engage with CaEFT. It is intended to comply with the Protection of Personal Information Act 4 of 2013 (“POPIA”), the Promotion of Access to Information Act 2 of 2000 (“PAIA”) and other applicable South African laws.

1.3 Responsible Party

For purposes of POPIA, CaEFT is the “Responsible Party” in respect of the Personal Information that we Process as described in this Policy.

1.4 Information Officer

CaEFT has appointed an Information Officer in terms of POPIA and PAIA. The Information Officer is the same person identified in CaEFT’s PAIA Manual.

Information Officer: **SD Naidoo**
Position: Information Officer
Telephone: +27 21 565 0567
Email: admin@caeft.com
Physical Address: Raft House, 3 Monte Vista Boulevard, Monte Vista, 7460, Cape Town, Western Cape, South Africa
Postal Address: Raft House, 3 Monte Vista Boulevard, Monte Vista, 7460, Cape Town, Western Cape, South Africa

Any questions about this Policy or our Processing of Personal Information should be directed to the Information Officer.

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2. DEFINITIONS

2.1 “Personal Information” has the meaning given to it in section 1 of POPIA and includes information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person, including, but not limited to:

- information relating to race, gender, sex, pregnancy, marital status, national, ethnic or social origin, colour, sexual orientation, age, physical or mental health, wellbeing, disability, religion, conscience, belief, culture, language and birth.
- information relating to education or medical, financial, criminal or employment history.
- any identifying number, symbol, email address, physical address, telephone number, location information, online identifier or other particular assignment to the person.
- biometric information.
- personal opinions, views or preferences.
- correspondence that is implicitly or explicitly of a private or confidential nature.
- the views or opinions of another individual about the person; and
- the name of the person if it appears with other Personal Information or if the disclosure of the name itself would reveal information about the person.

2.2 “Special Personal Information” has the meaning given in section 26 of POPIA and includes Personal Information relating to religious or philosophical beliefs, race or ethnic origin, trade union membership, political persuasion, health or sex life, biometric information and criminal behaviour (to the extent it relates to the alleged commission of any offence or any proceedings in respect of any offence).

2.3 “Processing” means any operation or activity concerning Personal Information, whether or not by automated means, including collection, receipt, recording, organisation, collation, storage, updating or modification, retrieval, consultation, use, dissemination, distribution, merging, linking, restriction, degradation, erasure or destruction.

2.4 “Operator” means a person who Processes Personal Information for a Responsible Party in terms of a contract or mandate, without coming under the direct authority of that party. In this Policy, references to “Third Party Processors” are references to Operators.

2.5 “Third Party Service Provider” means any third party that provides services to CaEFT, including payment processing, information technology, communication, file and data storage, copying, printing, accounting, auditing, investigation, compliance, risk management or professional advisory services.

2.6 “Website” means any website and such other URLs as may be operated or maintained from time to time by CaEFT or on CaEFT’s behalf.

2.7 “Cookie” means a small text file that is stored on your device when you visit a website, which may contain information such as your device identifier, user preferences and browsing information.

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3. SCOPE OF THIS POLICY

3.1 This Policy applies to all external parties whose Personal Information we Process, including:

- our clients and their representatives.
- end-customers whose transactions we process.
- visitors to our offices.

- visitors to and users of our website; and
- any other individuals who interact with CaEFT.

3.2 This Policy does not apply to information that does not constitute Personal Information under POPIA, such as anonymised or aggregated data that cannot be linked to an identifiable individual or juristic person.

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4. CATEGORIES OF PERSONAL INFORMATION WE PROCESS

We may Process the following categories of Personal Information, as relevant to our relationship with you:

(a) **Identity and demographic information**

- name and surname.
- identity or passport number.
- date of birth and age.
- nationality and residency status.
- gender, salutation and title.
- language preferences.

(b) **Contact information**

- physical and postal addresses.
- email addresses.
- mobile and landline telephone numbers.
- details of your public social media profiles (where you choose to interact with us via such platforms).

(c) **Financial and transactional information**

- bank account details.
- payment card details (to the extent necessary and in compliance with applicable security standards).
- billing address and billing contact details.
- transaction records, including payment amounts, dates, times, merchant details and reference numbers.
- proof of address and proof of income or financial information where required by law (for example, under the Financial Intelligence Centre Act 38 of 2001 (“FICA”)) or for risk assessment and fraud prevention.

(d) **Employment and professional information**

- your job title and role.
- the name, address and contact details of your employer or organisation.
- professional qualifications and regulatory status where relevant.

(e) **Technical and usage information**

- device type, operating system, browser type and version.
- IP address and approximate location.
- dates and times of access to the Website.

- log data relating to your use of our systems and services.
- information collected through Cookies and similar technologies (see section 11).

(f) **Communications and interaction information**

- records of communications with you (including emails, telephone calls, messages and in-person meetings);
- records of your interactions with our website, online content and advertising, including forms you complete and preferences you indicate.

(g) **Special Personal Information**
Where necessary and lawful, we may Process Special Personal Information, for example:

- race or ethnic origin (where required for regulatory reporting or transformation initiatives);
- biometric information (if used for authentication or security);
- information relating to criminal behaviour (for example, in fraud investigations or background checks).

We will only Process Special Personal Information in accordance with sections 26–33 of POPIA and, where required, with the authorisation of the Information Regulator.

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5. HOW WE COLLECT PERSONAL INFORMATION

5.1 We collect Personal Information directly from you when you:

- apply for or use our services.
- complete forms or documentation.
- communicate with us by email, telephone, in person or via our Website.
- visit our offices; or
- respond to surveys, marketing communications or promotions.

5.2 We may also collect Personal Information from:

- your employer or organisation, where you act on their behalf.
- our clients, where we provide payment processing or related services to them.
- Third Party Service Providers and Operators (for example, credit bureaus, fraud prevention agencies, verification service providers).
- publicly available sources (for example, company registries, public websites, social media platforms); and
- regulators, law enforcement agencies and other public bodies.

5.3 Where we collect Personal Information about you from a source other than you, we will, where required by POPIA, take reasonably practicable steps to ensure that you are made aware of such collection and of the information set out in section 18(1) of POPIA, including the source of the information, the purpose for which it is collected and your rights in relation thereto.

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6. PURPOSES OF PROCESSING AND LEGAL GROUNDS

6.1 We Process Personal Information for the following purposes and on the following legal bases (which are aligned with section 11 of POPIA and with the “Processing of Personal Information” section of our PAIA Manual):

(a) **Service delivery and contract management**

- to provide payment processing and related services.
- to open, maintain and administer client accounts.
- to execute, manage and record transactions.
- to communicate with you regarding our services.
- to manage our relationship with you and your organisation.

Legal basis: Processing is necessary to carry out actions for the conclusion or performance of a contract to which you are party or in order to take steps at your request prior to entering into a contract (POPIA s 11(1)(b)), and/or is necessary for our legitimate interests or those of a third party, except where such interests are overridden by your rights (s 11(1)(f)).

(b) **Legal and regulatory compliance**

- to comply with our obligations under FICA and anti-money laundering and counter-terrorist financing laws.
- to comply with the National Payment System Act and related regulations.
- to comply with tax, accounting and auditing requirements.
- to respond to lawful requests from regulators, law enforcement and other public authorities.
- to comply with court orders and legal processes.

Legal basis: Processing is required by law (POPIA s 11(1)(c)).

(c) **Risk management, fraud prevention and security**

- to verify identities and perform due diligence.
- to detect, prevent and investigate fraud, money laundering, terrorist financing and other unlawful activities.
- to monitor and secure our systems, networks and premises.
- to manage and report risk.

Legal basis: Processing is required by law (s 11(1)(c)) and/or is necessary for our legitimate interests or those of a third party (s 11(1)(f)).

(d) **Business operations and improvement**

- to conduct internal audits, data analysis and research.
- to improve and develop our services, systems and processes.
- to manage our business, including planning, budgeting and reporting.

Legal basis: Legitimate interests (s 11(1)(f)).

(e) **Marketing and communications**

- to send you information about our services, events and promotions.
- to conduct market research and surveys.
- to personalise our marketing content.

Legal basis: Your consent (s 11(1)(a)) where required (for example, certain forms of direct electronic marketing under section 69 of POPIA), and/or our legitimate interests (s 11(1)(f)), subject to your right to object at any time to direct marketing.

6.2 Where we rely on your consent, you may withdraw your consent at any time by contacting us using the details in section 13. Withdrawal of consent will not affect the lawfulness of Processing that took place before the withdrawal.

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7. DISCLOSURE OF PERSONAL INFORMATION

7.1 We may share your Personal Information with the following categories of recipients, to the extent necessary for the purposes set out in this Policy and in our PAIA Manual:

- our affiliates.
- banks, card schemes and other financial institutions involved in processing your transactions.
- Third Party Service Providers and Operators who provide services to us (including IT, hosting, data storage, payment processing, verification, analytics, auditing, legal, accounting and other professional services).
- regulators, supervisory authorities and public bodies (including the South African Reserve Bank, the Financial Intelligence Centre, the South African Revenue Service and other competent authorities).
- law enforcement agencies, courts and tribunals, where required by law or in connection with legal proceedings.
- our business partners, investors or prospective purchasers, in connection with any sale, merger, acquisition or restructuring of our business, subject to appropriate confidentiality safeguards.
- third parties to whom you have expressly consented that we may disclose your Personal Information.

7.2 Where we appoint an Operator to Process Personal Information on our behalf, we will conclude a written agreement with that Operator as required by POPIA, obliging the Operator to:

- Process Personal Information only on our documented instructions.
- implement appropriate, reasonable technical and organisational security measures.
- treat Personal Information as confidential; and
- notify us promptly of any actual or suspected security compromise.

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8. CROSS-BORDER TRANSFERS

8.1 Due to the nature of our services, we may transfer Personal Information to recipients in other countries, for example:

- international payment networks and card schemes.
- foreign banks and financial institutions;
- cloud service providers and data centres located outside South Africa.

8.2 Any transfer of Personal Information outside South Africa will comply with section 72 of POPIA and with our PAIA Manual. This may include:

- ensuring that the recipient is subject to a law, binding corporate rules or binding agreement which provides an adequate level of protection that is substantially similar to POPIA.
- transferring the information where the transfer is necessary for the performance of a contract between you and us, or for the implementation of pre-contractual measures taken in response to your request.
- transferring the information where the transfer is necessary for the conclusion or performance of a contract concluded in your interest between us and a third party.
- obtaining your consent where appropriate; or
- transferring the information where it is for your benefit and it is not reasonably practicable to obtain your consent, but such consent would likely be given.

8.3 You may contact our Information Officer for further information about the safeguards we apply to cross-border transfers.

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9. SECURITY SAFEGUARDS

9.1 We implement appropriate, reasonable technical and organisational measures to prevent loss of, damage to, unauthorised destruction of, and unlawful access to or Processing of Personal Information, as required by section 19 of POPIA. These measures are consistent with the “Information Security Measures” described in our PAIA Manual and include, where appropriate:

- encryption of data in transit and at rest.
- access controls and authentication mechanisms.
- network security measures, including firewalls and intrusion detection.
- secure development and change management practices.
- physical security controls at our premises.
- staff training and awareness programmes.
- regular security testing, monitoring and audits.

9.2 In the event of a security compromise (as defined in POPIA), we will comply with our obligations under section 22 of POPIA, including:

- taking immediate steps to identify and contain the compromise.
- assessing the risk to affected data subjects.
- notifying the Information Regulator and affected data subjects as soon as reasonably possible, where required; and
- taking remedial actions to prevent a recurrence.

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10. RETENTION OF PERSONAL INFORMATION

10.1 We will not retain Personal Information for longer than is necessary to achieve the purposes for which it was collected or subsequently Processed, unless:

- retention is required or authorised by law.
- we reasonably require the information for lawful purposes related to our functions or activities.

- retention is required by a contract between us and you; or
- you have consented to longer retention.

10.2 In particular, we may retain:

- FICA-related records for at least 5 years after the end of the business relationship or the date of the transaction, as required by law.
- tax and accounting records for at least 5 years, as required by tax legislation.
- transaction records for periods required by applicable financial sector laws and card scheme rules.
- records necessary for the establishment, exercise or defence of legal claims for the duration of the relevant prescription period.

10.3 When we no longer need to retain Personal Information, we will take reasonable steps to destroy or de-identify it in a secure manner.

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11. COOKIES AND ONLINE TRACKING

11.1 Our Website uses Cookies and similar technologies to:

- enable basic functionality and security.
- understand how visitors use our website.
- improve performance and user experience.
- provide relevant content and, where applicable, marketing.

11.2 We will only use non-essential Cookies (such as analytics or marketing Cookies) where permitted by law and, where required, with your consent. You can manage your Cookie preferences through:

- the Cookie settings on our website (where available); and/or
- your browser settings, which allow you to block or delete Cookies.

11.3 If you disable certain Cookies, some features of our website may not function properly.

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12. YOUR RIGHTS

12.1 As a data subject, you have the following rights under POPIA (and, in relation to access, under PAIA), subject to applicable limitations:

- **Right of access:** to request confirmation of whether we hold Personal Information about you and to request access to such information (POPIA s 23). Where you request access to records held by CaEFT as a private body, the procedures, forms (including PAIA Form 2) and fees set out in our PAIA Manual will apply.
- **Right to correction or deletion:** to request that we correct or delete Personal Information that is inaccurate, irrelevant, excessive, out of date, incomplete, misleading or obtained unlawfully (POPIA s 24).
- **Right to objection:** to object, on reasonable grounds, to the Processing of your Personal Information where we rely on our legitimate interests (s 11(3) and s 24), and to object at any time to the Processing of your Personal Information for purposes of direct marketing (s 69).

- **Right to withdraw consent:** where Processing is based on your consent, to withdraw that consent at any time.
- **Right to complain:** to lodge a complaint with the Information Regulator if you believe we are interfering with the protection of your Personal Information or otherwise acting in breach of POPIA or PAIA.

12.2 To exercise your rights, please contact our Information Officer using the details in section 1.4. We may require you to complete a prescribed form and to provide proof of identity. We will respond to your request within the time periods prescribed by POPIA and PAIA.

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13. COMPLAINTS AND CONTACT DETAILS

13.1 **Contacting CaEFT**
If you have any questions, concerns or complaints about this Policy or our Processing of your Personal Information, please contact our Information Officer:

Information Officer: SD Naidoo
Email: admin@caeft.com
Telephone: +27 21 565 0567
Postal Address: Raft House, 3 Monte Vista Boulevard, Monte Vista, 7460, Cape Town, Western Cape, South Africa

13.2 We will investigate and attempt to resolve any complaints or disputes regarding the use or disclosure of Personal Information.

13.3 **Information Regulator**
If you are not satisfied with our response, you may lodge a complaint with the Information Regulator:

Information Regulator (South Africa)
Website: https://inforegulator.org.za
Email: complaints.IR@inforegulator.org.za / POPIAComplaints@inforegulator.org.za (as applicable from time to time)
Physical Address: Woodmead North Office Park, 54 Maxwell Drive Woodmead, Johannesburg,
Postal Address: P.O. Box 31533, Braamfontein, Johannesburg, 2017

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14. RELATIONSHIP WITH OUR PAIA MANUAL

14.1 This Policy should be read together with CaEFT's PAIA Manual prepared in terms of section 51 of PAIA.

14.2 The PAIA Manual contains further information about:

- the categories of records held by CaEFT;
- how to make a request for access to records (including the use of PAIA Form 2).
- applicable fees.
- grounds on which access may be refused; and
- remedies available to requesters.

14.3 In the event of any inconsistency between this Policy and the PAIA Manual in relation to procedures for access to records under PAIA, the PAIA Manual will prevail to the extent of the inconsistency.

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15. CHANGES TO THIS POLICY

15.1 We may update this Policy from time to time to reflect changes in our Processing activities, legal requirements or business practices.

15.2 The latest version of this Policy will be available on our website and will indicate the effective date. Where appropriate, we will notify you of material changes by email, by a notice on our website or through other appropriate channels.

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16. DOCUMENT CONTROL

Version: 1.0
Approved by: SD Naidoo Information Officer
Approval Date: 1/02/2026
Next Review Date: 1/02/2026