Data Protection & Cookie Policy

Effective Date: [To be confirmed by ZIVEST]
Last Updated: 23/10/2026

1. Introduction

ZIVEST (PTY) LTD ("we," "us," "our"). Your privacy and data security are paramount. This combined Data Protection & Cookie Policy explains how we collect, use, store, and protect your personal information in accordance with the Protection of Personal Information Act (POPIA) and other applicable data-protection requirements.

This policy also explains how we use cookies and similar tracking technologies on our website to enhance your experience and for legitimate business purposes.

2. Personal Data We Collect

We may collect the following personal information from you when you use our services or visit our website:

- Identity information (e.g., name, date of birth, ID number, passport details)
- Contact details (e.g., address, phone number, email)
- Financial information (e.g., bank account details, transaction history)
- Identification documents (for KYC and AML purposes)
- Technical data (e.g., IP address, browser type, device information)
- Usage data (e.g., pages visited, time spent on site, click patterns)

3. How We Use Your Personal Data

We use your personal data to:

- Verify your identity and conduct due diligence in compliance with KYC and AML regulations.
- Provide you with our financial services and support.
- Communicate with you, including responding to queries and sending important notifications.

- Comply with legal and regulatory obligations, including reporting to authorities.
- Improve our website, services, and marketing efforts.
- Manage and administer our business operations securely.

4. Legal Basis for Processing

We process your personal data based on one or more of the following legal grounds:

- Your consent (where required).
- To fulfil our contractual obligations to you.
- Compliance with legal and regulatory requirements.
- Our legitimate interests, provided this does not override your rights.

5. Data Sharing and Disclosure

We may share your personal data with:

- Regulatory and law enforcement authorities as required by law.
- Third-party service providers who assist us in operating our business (e.g., IT services, compliance consultants) under strict confidentiality agreements.
- Our affiliates or partners as necessary to deliver services.

We do not sell or trade your personal data to third parties for marketing purposes.

6. Data Security

We implement appropriate technical and organizational measures to protect your personal data against unauthorized access, alteration, disclosure, or destruction. These include encryption, access controls, and secure storage.

7. Data Retention

We retain your personal data only as long as necessary to fulfil the purposes outlined in this policy, comply with legal obligations, resolve disputes, and enforce our agreements. Generally, we retain records for a minimum of **5 years** in accordance with regulatory requirements.

8. Your Rights

Subject to applicable laws, you have the right to:

- Access and obtain a copy of your personal data.
- Request correction of inaccurate or incomplete data.
- Request deletion of your data, subject to legal retention obligations.
- Object to or restrict processing under certain conditions.
- Withdraw consent at any time, where processing is based on consent.
- Lodge a complaint with the Information Regulator or relevant authority.

To exercise your rights, please contact us at [Insert contact details].

9. Cookies and Tracking Technologies

9.1 What Are Cookies?

Cookies are small text files stored on your device when you visit a website. They help improve your experience by remembering preferences and enabling website functionality.

9.2 How We Use Cookies

We use cookies to:

- Ensure website functionality and security.
- Analyse website usage and improve performance via analytics tools.
- Personalize content and marketing communications.

9.3 Types of Cookies We Use

- **Strictly Necessary Cookies:** Essential for website operation and cannot be disabled.

- **Performance Cookies:** Collect anonymous information on how visitors use the site.
- **Functional Cookies:** Remember your preferences and settings.
- **Targeting/Advertising Cookies:** Used to deliver relevant advertisements and measure their effectiveness.

9.4 Your Cookie Choices

You can manage or disable cookies through your browser settings; however, disabling certain cookies may affect website functionality. Our cookie banner (if used) will allow you to accept or reject non-essential cookies.

10. Third-Party Cookies

We may allow third-party services (e.g., Google Analytics, advertising partners) to place cookies on your device. These third parties have their own privacy policies and controls.

11. Changes to This Policy

We may update this policy periodically to reflect changes in our practices, technology, or legal requirements. We encourage you to review this page regularly. Significant changes will be communicated through our website or direct notifications.

12. Contact Us

If you have questions or concerns about this policy or your personal data, please contact:

ZIVEST (PTY) LTD
Office 1215, The Leonardo, 75 Maude S, Sandown, Sandton, Gauteng, 2196, South Africa
Email: [ZIVEST general contact email - to be confirmed]