



PRIVACY POLICY

(Version effective as of 1 June 2026)

Pay At Services (Pty) Ltd and our group of companies are committed to protecting the privacy of the users of our websites, software applications and services. We respect your personal information and for this reason, we have developed this policy to govern our processing thereof. This document sets out:

- (a) How we collect personal information;
- (b) What types of personal information we collect and hold;
- (c) How we safeguard your personal information;
- (d) The purposes for which we use such personal information; and
- (e) Rights with respect to the personal information held by us.

When we refer to “we”, “us” or “our” herein we are referring to Pay At Services (Pty) Ltd established in South Africa with registration number 2006/027951/07 and its group companies, or any of them, as the context requires. When we refer to “you” or “your” herein we are referring to you, the users of our websites, software applications and/or services.

We may, without notice and in our sole and absolute discretion, make changes to this policy from time to time. Such changes will take effect as and when published. It is your responsibility to review our published policy on each occasion prior to making use of our websites, software applications or services. If you continue with such use after our amended policy has been published, it will constitute acceptance of such amended policy.

How we collect information

We collect information about you directly from you as well from third parties and publicly accessible sources in certain cases. The means and sources we use to collect information about you is as follows:

- (a) From you, including when you enquire about or register for or use our websites, software applications or services, including by using cookies and other online tracking technologies;
- (b) From public registers, credit bureaus, money laundering, fraud prevention and law enforcement agencies;
- (c) From our business partners and service providers, and other persons that are involved in enabling our websites, software applications or services or in performing the services, which may include banks, wallet providers, payment beneficiaries, debt collectors, providers of data and legal status verification services, outsource services, communications services and/or data hosting, processing and management services;
- (d) From other persons or entities which may be legally entitled to provide us with information about you; and
- (e) From persons or entities which you may consent to providing us with information about you.

Information we hold about you

We record and hold the following types of information about you:

- (a) Details of when you contact us and when we contact you, including your residential address, email address and telephone numbers as well as the content of the communications between us, which we may record;
- (b) Information collected regarding your use of our websites using cookies and online tracking tools, including your IP addresses, device identifiers, internet or other electronic network activity information, browser characteristics, operating system details, language preferences, referring URLs, length of visits, and pages viewed;
- (c) All information contained in the forms, requests or instructions you submit to us, whether online, via electronic mail, telephonically or using other means, including all instructions you submit via our websites, software applications or services;
- (d) Details about you or your payment mechanisms or payments which you provide to us to register with us or that are submitted or arise in the course of your use of our websites, software applications or services, including your name, age, place of residence, nationality, personal identification number, contact details, bank account details, payment card details, banking credentials for gaining access to and submitting instructions on your accounts, income tax number, source of funds, beneficiaries, account balances and payment history;
- (e) Information received pursuant to our enquiries with our business partners, your bank, data and legal status verification service providers, regulatory authorities, public registers, credit bureaus, money laundering, fraud prevention and/or law enforcement agencies; and
- (f) Details of your preferences regarding your use of our websites, software applications, services and other offerings.

We may combine personal information we collect from you with personal information we obtain from other parties. We may hold your personal information for up to 5 years from the date of collection, or during the term of your registration for use of our websites, software applications or services and for up to 5 years thereafter, as the case may be, subject thereto that in either case we shall not hold your personal information for a period which exceeds the maximum period permitted by applicable law.

The purposes for which we use your personal information

Certain of the information which we collect about you, as identified below, we need to use in order to process your requests for and instructions utilizing our websites, software applications or services, comply with our legal obligations and exercise our rights under agreements we have with you. If we do not have the right to use such information it will not be possible for you to make use of our websites, software applications or services or for us to process requests related thereto. Such information includes:

- (a) Your name, age, place of residence, nationality, identity number, contact details, bank account details, and legal status;
- (b) Your preferences regarding your use of our websites, software applications or services;
- (c) Your banking credentials, bank account details, payment card details and the payment instructions which you submit via our websites, software applications or services;
- (d) Detail of all payments facilitated for you via our websites, software applications or services, including amounts and beneficiaries involved;
- (e) The information about you which we have received from business partners, your bank, data and legal status verification service providers, regulatory authorities, public registers, credit bureaus, money laundering, fraud prevention and law enforcement agencies; and
- (f) The information which you and third parties have provided to us which we need to verify that the information which we have received from or about you are accurate, complete and up to date.

Other information about you which we hold and which we do not need for purposes of providing our websites, software applications or services to you, and which we make use of based on your consent, will be used by us only for the purposes as agreed to by you. We may also use information we hold about you for purposes required by or as permitted under applicable law.

We collect and will process your information only to the extent that we are legally permitted to do so and for the following purposes:

- (a) To process your application to register to use our websites, software applications or services and making related decisions, including by verifying your identity, age, nationality, place of residence, legal status (including whether you are subject to sanctions), bank account details and otherwise ascertaining that you are and remain eligible to receive our websites, software applications or services;
- (b) To present invoices and payment reminders to or for you, to facilitate and execute payment requests for you, and to monitor and report on such payments to regulatory authorities;
- (c) To improve our websites, software applications or services and your use thereof, and to exercise our rights and comply with our duties in respect thereof, including, as applicable to the use of our websites, software applications or services, by processing and recording all service requests, managing service-related accounts, communicating with you regarding the services, communicating with your and our clients in connection with such service requests and collecting payments that may be owing;
- (d) To ensure that the information we receive and hold about you and your clients and beneficiaries is accurate, complete and up to date;
- (e) To prevent, investigate and prosecute fraud, money laundering, funding of terrorism, abuse of our websites, software or services and other unlawful activities;
- (f) To comply with legal and regulatory requirements, for audit purposes and legal proceedings;
- (g) To conduct market research and business analysis, understand your preferences, learn more about the products and services that you offer or are interested in and improve the products and services we offer to you;
- (h) To inform and provide you with the opportunity to make use of products, services and benefits that we offer and that we believe may be of interest to you to the extent that we are lawfully permitted to do so; and
- (i) For such other purposes as you may consent to or as may otherwise be lawfully permitted, including for the purposes of protecting our and/or your legitimate interests and/or that of our suppliers and other customers.

Please note that we will not contact you telephonically for unsolicited marketing purposes or send unsolicited marketing communications to you by facsimile, SMS or electronic mail if you have objected to receiving such communications by way of a public register recognised for such purposes by law or by notifying us of your objection in the prescribed manner. We will provide you with reasonable opportunities to object to receiving marketing communications in the manner prescribed by law, including upon application for our services and on each occasion when we send you such communications.

Sharing your information

Keeping your personal and financial information secure is one of our most important responsibilities. We cannot disclose your information unless legally permitted thereto. Save as set out below, we will not transfer your information to other persons or entities without your consent unless legally obliged thereto. In particular, we do not sell lists or databases with our clients' information and will not provide any of your information to entities outside our group so as to permit them to market their products or services to you. You accept that we may transfer your information to the following people and organisations, who may be located inside or outside South Africa, in pursuit of the data processing purposes to set out in this policy:

- (a) To our group companies and to all persons employed or contracted by us or our group companies, including to our executives, directors, employees, contractors, agents, auditors, officers, legal and other professional advisors and of our group companies;
- (b) To governmental, judicial, regulatory and law enforcement bodies and agencies that have jurisdiction over you or us or over your or our activities, including in compliance with a subpoena, search warrant, or other legal process;
- (c) To persons engaged by us at your request to provide services on your behalf, including for presentment of client invoices and payment reminders and for facilitating and executing payments for you;

- (d) To other persons that are engaged by us to assist us in conducting our business operations or in enabling or supplying our websites, software applications or services to you or in executing your instructions, including for client and account verification, system and data hosting, processing and management and transfers of payments;
- (e) To any person to whom any part of our business or assets is being offered for sale or transfer;
- (f) To credit bureaus and fraud prevention agencies, provided that we will notify you in advance before we provide adverse information about you to a credit bureau and, upon request, provide you with a copy of such information as required by law;
- (g) To any person that acts as your legal guardian, executor of your estate, curator or in a similar capacity;
- (h) To such other persons as may be permitted by applicable law or that you may consent to.

We may use selected marketing tools and platforms to analyse our marketing campaigns and, in this regard, we may share your information in hashed form with platform providers, such as Google or Microsoft, for analysis, attribution, and marketing optimisation. These providers may compare and aggregate your hashed information with the information of other users for such purposes.

Security

We will strive at all times to ensure that your records will always be protected against unauthorised or accidental access, processing or loss. We maintain this commitment to data security by implementing appropriate reasonable technical and organisational measures to safeguard and secure your information. If we use a third party to host, manage or process your data on our behalf we will require that such third party also commit to implementing appropriate reasonable technical and organisational measures to safeguard and secure your information. You acknowledge that the transmission of data via the internet and online digital storage are not completely secure and that we cannot guarantee the security of your information. If we are not prevented by a law enforcement or regulatory agency, we will notify you without undue delay if we believe that unauthorised access to your information may have occurred, providing you with such information as you may reasonably require to implement protective measures.

Website Use and Cookies

We automatically record your visits to our websites in our web server logs which typically show your IP address (the unique number which your machine uses when it is connected to the Internet), your device identifiers, your browser characteristics and operating system details, language preferences, geographic location, referring URLs, length of visits, and the pages you viewed. We may use web analytics services to help us understand and analyze how you use our websites and to serve advertisements on our behalf. It also helps us understand which areas of the site are of particular interest and which pages are not being requested, and tells us how many hits and page requests we get.

When you visit our website(s) we may use cookies and other online tracking technologies to process data about your interactions with our websites, including to help you access and navigate such websites, analyze your use, retain your preferences, personalize content, deliver and customize advertisements, and track advertising campaigns. Such information may be stored in a cookie on your device by your web browser. Most browsers accept cookies automatically, but you can alter the settings of your browser to disable cookies. If you choose not to accept cookies, you may not be able to use all of the features of our site and disabling cookies may invalidate some of your opt outs that rely on such cookies. Please note that our websites are not designed to respond to any "Do Not Track" signals transmitted by your web browser.

Further, please note that we may permit third parties to use, store, or access your cookies and other online tracking technologies to collect or receive information from our websites and use it to provide advertising services targeted to your interests, and we may also share with and permit the processing by third parties of any of your automatically collected personal information for such purposes.

We may also allow third party suppliers to provide some of the interactive features on our websites on our behalf. Your use of such features is voluntary, and we may retain the information that you submit through these features. By using such a feature, you accept that the supplier involved may process the information obtained through the feature to provide the relevant service on our behalf.

Finally, we may enable access to, or display of, third-party content, that is served or published by third parties on our websites and that may enable the collection of information from you when you interact with such third parties. We may also provide specific third-party features, interfaces or links on our websites to facilitate communication between you and third parties or third-party websites. Please note that third parties may collect information from you during your interactions with them or their content or websites and their processing of such information is not covered by this policy and is not our responsibility. Such third parties may have their own privacy policies or notices that you should review to understand how they may collect and process your personal information.

Your rights regarding your information

Provided that you give us suitable and adequate proof of your identity, you have the right:

- (a) To know which records we hold about you;
- (b) Access your personal information;
- (c) In cases where our right to process your personal information is based on your consent, to withdraw such consent at any time, provided that this shall not affect the lawfulness of processing which occurred prior to such withdrawal;

- (d) To object to the further collection, use, sharing or processing of your personal information by us at any time where such processing activities are not necessary for us to comply with our obligations under an agreement we have with you, to exercise our rights, or for such other purposes as may be required or permitted by applicable law; and
- (e) to require us to correct, erase or cease processing information or records we hold about you based on your consent, or that we are no longer permitted to retain, or which are inaccurate, irrelevant, excessive, out of date, incomplete, misleading or has been unlawfully obtained;

Any of the above can be done by contacting us directly by any means provided by us, including by submitting a written request to us via email at informationofficer@payat.co.za. You may be required to provide us with proof that you qualify to assert the rights you wish to exercise, including of your identity and residence. We will notify you of the steps taken as a result of your request. We will not be obliged to provide you with information or agree to your request to the extent that we are prohibited thereto by applicable law, if compliance would unreasonably prejudice our legitimate interests or that of a third party, or if we have a legal basis upon which to deny your request. Please note that we may require a reasonable period to comply with your request.

Complaints

Please notify us at informationofficer@payat.co.za if you have any concerns about the processing of your personal information.

If your concerns are not satisfactorily resolved you may lodge a complaint with the South African Information Regulator at complaints.IR@justice.gov.za or +27 (0) 10 023 5200.