



Privacy Policy

Vitality Connect (Pty) Ltd

Registration Number: 2024/198262/07

Effective Date: 1 August 2024

Contact: privacy@vitalityconnect.co.za

1. Introduction

Vitality Connect (Pty) Ltd ("Vitality Connect", "we", "us", or "our") respects your right to privacy and is committed to protecting your personal information in compliance with the **Protection of Personal Information Act (POPIA), Act 4 of 2013**. This Privacy Policy outlines how we collect, use, store, disclose, and protect your personal data when you interact with us through our website, products, coaching services, digital content, and related wellness platforms.

2. What Personal Information We Collect

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

- **Identification and Contact Data:** Name, email address, phone number, ID/passport number, physical address
- **Account Information:** Login credentials, profile data, preferences
- **Wellness Information:** Health assessments, dietary habits, lifestyle details, symptom tracking (if voluntarily submitted)
- **Payment Data:** Billing and transaction records (handled by third-party payment processors)
- **Technical Data:** IP address, browser type, device type, operating system, usage data via cookies and analytics tools
- **Communication Data:** Emails, messages, feedback, and support queries



3. How We Collect Personal Information

Your personal information may be collected through:

- Direct interactions (e.g. registration forms, assessments, coaching)
- Website activity and online tools (e.g. quizzes, subscription forms)
- Email correspondence or phone communication
- Third-party integrations (e.g. wellness app APIs or analytics tools, with your consent)

4. Purpose of Processing Your Personal Information

We collect and use your personal information for the following purposes:

- To provide you with personalised wellness services and product recommendations
- To process course enrolments and manage subscriptions
- To communicate with you regarding your use of our services or purchases
- To improve our services, content, and platform performance
- To comply with legal obligations (e.g. tax, POPIA, or other applicable laws)
- To ensure safety and security of our platforms and user data

5. Legal Basis for Processing

We will only process your personal information when:

- You have **given consent** for specific processing activities
- It is necessary to **perform a contract** with you
- It is required to **comply with a legal obligation**
- It is necessary to protect your **vital interests**
- We have a **legitimate interest** that does not override your rights and freedoms



6. Disclosure of Personal Information

We do not sell or rent your data. Your information may be shared with:

- Service providers who assist in delivering our services (e.g. cloud platforms, payment processors)
- Professional wellness practitioners working with you (only with your consent)
- Regulatory bodies or legal authorities if required by law
- Marketing or analytics partners (in anonymised or aggregated format only)

All third-party processors are contractually obligated to maintain confidentiality and comply with POPIA or equivalent data protection standards.

7. International Data Transfers

If your data is transferred outside South Africa, we will ensure:

- The recipient country has data protection laws that offer equivalent protection (e.g., GDPR-compliant jurisdictions), or
- Appropriate contractual clauses (e.g., Data Processing Agreements) are in place to protect your rights

8. Data Security

We implement the following measures to safeguard your personal information:

- End-to-end encryption for data transfers
- Secure servers and firewalls
- Role-based access control and staff confidentiality agreements
- Regular audits and updates to prevent data breaches



9. Data Retention

We retain your personal data only for as long as necessary to fulfil the purposes outlined in this policy or as required by law (e.g., financial records must be retained for 5 years). After this period, we securely delete or anonymise your data.

10. Your Rights Under POPIA

You have the right to:

- Request access to the personal data we hold about you
- Request correction or deletion of your personal data
- Withdraw your consent at any time (where applicable)
- Object to processing based on legitimate interest
- Lodge a complaint with the **Information Regulator** if your rights are violated

Information Regulator contact details:

- Email: complaints.IR@justice.gov.za
- Website: www.inforegulator.org.za

11. Cookies and Analytics

Our website uses cookies and similar technologies to:

- Enhance user experience
- Track site performance and visitor behaviour
- Offer personalised content and marketing (only with consent)

You may disable cookies through your browser settings. Note that some features may not function optimally without cookies.



12. Third-Party Links

Our website and courses may contain links to third-party websites. We are not responsible for the privacy practices of these external sites. Please review their policies before sharing any information.

13. Updates to this Policy

We reserve the right to modify this Privacy Policy at any time. Updates will be posted on our website, and where appropriate, communicated via email. Continued use of our services indicates acceptance of any changes.

14. Contact Us

For privacy-related queries, data access requests, or complaints, please contact:

Vitality Connect (Pty) Ltd

Information Officer: Jeanine Groenewald

Email: privacy@vitalityconnect.co.za

Address: 2 Computer Road, Montague Gardens, 7441, Western Cape, South Africa