POLICY · FSP 47661

# Privacy Policy

*Domisa Financial Services (Pty) Ltd, trading as Domisa Treasury*

## 01 — INTRODUCTION

Domisa Financial Services (Pty) Ltd, trading as Domisa Treasury ("**Domisa**", "**we**", "**us**" or "**our**"), is committed to protecting the privacy and security of personal information in accordance with the **Protection of Personal Information Act, 4 of 2013 ("POPIA")**, and other applicable South African laws.

This Privacy Policy explains how we collect, use, store, disclose, and protect personal information when you interact with us, use our services, or engage with our platform.

This Policy applies to all clients, prospective clients, counterparties, service providers, representatives, and visitors to our website or systems.

## 02 — RESPONSIBLE PARTY

Domisa is the **responsible party** for purposes of POPIA.

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|---|---|
| LEGAL NAME | Domisa Financial Services (Pty) Ltd |
| TRADING NAME | Domisa Treasury |
| CONTACT DETAILS | Email: info@domisa.co.za<br>Telephone: 021 205 1980 / 073 686 0818<br>Website: www.domisa.co.za |

## 03 — PERSONAL INFORMATION WE COLLECT

We may collect and process personal information including, but not limited to:

### 3.1 Individuals

- Full names, identity or passport numbers
- Date and place of birth, nationality, tax residency
- Residential and postal addresses
- Contact details (email, telephone)
- Banking details
- Transactional and payment information
- Source of funds and source of wealth information
- Biometric or facial verification data (where applicable)
- Correspondence and communications

### 3.2 Juristic persons and trusts

- Company or trust registration details
- Directors, members, trustees, shareholders, and beneficial owners
- Authorised signatories and representatives
- Financial and transactional information
- Supporting regulatory documentation

### 3.3 Technical and platform information

- Login credentials and access logs
- IP addresses and device information
- Audit trails, timestamps, and system activity records

## 04 — LAWFUL BASIS FOR PROCESSING

Domisa processes personal information **lawfully and transparently** in terms of POPIA. Depending on the context, processing may be based on one or more of the following lawful grounds:

### 4.1 Legal obligation

Processing is required to comply with applicable laws, including:

- **Financial Intelligence Centre Act (FICA)**
- **Financial Advisory and Intermediary Services Act (FAIS)**
- **Exchange control and SARB requirements**
- **Tax and accounting legislation**

In these cases, **consent is not required**.

### 4.2 Performance of a contract

Processing is necessary to:

- Onboard clients
- Provide treasury and foreign exchange intermediary services
- Execute transactions and instructions
- Administer client relationships

### 4.3 Legitimate interests

Processing is necessary for Domisa's legitimate business interests, including:

- Risk management
- Fraud prevention
- Platform security
- Compliance oversight
- Record-keeping and audit

### 4.4 Consent

Where required by law (for example, for certain forms of direct marketing), Domisa will obtain **specific, informed, and voluntary consent**, which may be withdrawn at any time.

## 05 — PURPOSE OF PROCESSING

We process personal information to:

- Identify and verify clients and beneficial owners
- Conduct customer due diligence and ongoing monitoring
- Provide foreign exchange and treasury services
- Meet regulatory and reporting obligations
- Prevent fraud and financial crime
- Communicate with clients and service providers

— Maintain accurate records and audit trails

— Improve and secure our systems and services

## 06 — DISCLOSURE OF PERSONAL INFORMATION

We may disclose personal information to:

— Authorised Dealers and partner banks

— Regulatory authorities (including SARB, FSCA, FIC, SARS)

— Service providers (IT, compliance, identity verification, document storage)

— Professional advisers (legal, audit, accounting)

— Courts or law enforcement where required by law

All disclosures are limited to what is **necessary and lawful**.

## 07 — CROSS-BORDER TRANSFERS

Personal information may be transferred outside South Africa where:

— Required for transaction execution

— Necessary for cloud hosting or service providers

In such cases, Domisa ensures that:

— The recipient is subject to laws or agreements providing **adequate protection**, or

— Appropriate contractual safeguards are in place

## 08 — INFORMATION SECURITY

Domisa implements **appropriate technical and organisational safeguards** to protect personal information against loss, misuse, unauthorised access, or disclosure, including:

— Access controls and authentication

— Encryption where appropriate

— Secure storage systems

— Audit logging and monitoring

## 09 — RETENTION OF INFORMATION

Personal information is retained only for as long as necessary, including:

— **At least five (5) years** where required under FICA or FAIS

— Longer where required by law, regulation, or legitimate business needs

Thereafter, information is securely deleted or anonymised.

## 10 — DATA SUBJECT RIGHTS

In terms of POPIA, data subjects have the right to:

— Access their personal information

— Request correction or deletion of inaccurate information

— Object to processing on reasonable grounds

— Withdraw consent (where consent is relied upon)

— Lodge a complaint with the **Information Regulator**

Requests may be directed to: **info@domisa.co.za**

## 11 — DIRECT MARKETING

Domisa may communicate with existing clients regarding its services.

Electronic direct marketing to prospective clients will only occur:

- With consent, or
- As otherwise permitted by section 69 of POPIA

Recipients may opt out at any time.

## 12 — COOKIES AND WEBSITE USE

Our website may use cookies and similar technologies to improve functionality and user experience.

Detailed information is available in our **Cookie Policy**, published on our website.

## 13 — AMENDMENTS

Domisa may update this Privacy Policy from time to time.

The latest version will always be available on our website.

## 14 — CONTACT AND COMPLAINTS

Questions, requests, or complaints regarding this Privacy Policy may be directed to:

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|---|---|
| DOMISA TREASURY | Email: info@domisa.co.za |

Data subjects may also lodge a complaint with:

| | |
|---|---|
| THE INFORMATION REGULATOR (SOUTH AFRICA) | Website: www.justice.gov.za/inforeg |