



PRIVACY POLICY

VAYU COACHING TECHNOLOGIES (PTY) LTD

Effective Date: _____

Version: 1.0

1. INTRODUCTION

VAYU Coaching Technologies (Pty) Ltd ("VAYU", "we", "us", or "our") respects your privacy and is committed to protecting your personal information.

This Privacy Policy explains how we collect, use, store, share, and protect personal information when you:

- Visit our websites;
- Use our mobile applications;
- Use our digital platforms;
- Subscribe to our services;
- Participate in coaching programmes;
- Interact with our AI-powered services;
- Contact us or communicate with us;
- Engage with our marketing activities.

This Privacy Policy has been developed in accordance with the Protection of Personal Information Act, 2013 ("POPIA") and other applicable laws.

By using our services, websites, applications, or platforms, you acknowledge that you have read and understood this Privacy Policy.

2. WHO WE ARE

Company Name

VAYU Coaching Technologies (Pty) Ltd

Registration Number

2026/430224/07

Trading Names

- VAYU
- VAYU Life Coaching

Physical Address

134 Ranger Road

Fish Hoek

Cape Town

7975

Western Cape

South Africa

General Contact Email

compliance@vayulifecoaching.co.za

Telephone

+27 62 899 2522

3. INFORMATION OFFICER

If you have questions regarding this Privacy Policy or how your personal information is processed, you may contact:

Chris Roos

Founder, Chief Executive Officer, Director and Information Officer

Email:

chris.roos@vayulifecoaching.co.za

Telephone:

+27 62 732 1090

4. INFORMATION WE COLLECT

Depending on your relationship with us, we may collect the following categories of personal information.

Identity Information

- Full name
- Date of birth
- Identity number where required
- Profile information

Contact Information

- Email address
- Telephone number
- Mobile number
- Physical address
- Postal address

Account Information

- Username
- Account preferences
- Subscription information
- Authentication information

Financial Information

- Billing information
- Transaction history
- Payment information
- Subscription records

Payment card information is generally processed by approved payment service providers and is not intentionally stored by us.

Coaching Information

Where coaching services are provided, we may collect:

- Coaching goals
- Assessment responses
- Progress information
- Accountability information
- Session notes
- Feedback

User-Generated Content

You may voluntarily create or submit:

- Journal entries
- Notes
- Reflections
- Goal-tracking information
- Habit-tracking information
- Uploaded content

Technical Information

We may collect:

- IP addresses
- Device information
- Browser information
- Operating system information
- Platform usage information
- Login information

Marketing Information

We may collect:

- Newsletter subscriptions
- Marketing preferences
- Campaign engagement information
- Event registrations

AI Interaction Information

Where AI-enabled services are used, we may collect:

- Prompts submitted by users
 - AI-generated responses
 - AI interaction history
 - Service usage information
 - AI-related feedback
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5. HOW WE COLLECT INFORMATION

We may collect information:

Directly From You

When you:

- Create an account;
- Complete forms;
- Subscribe to services;
- Contact us;
- Purchase services;
- Participate in coaching programmes;
- Use AI-enabled features.

Automatically

When you:

- Visit our websites;
- Use our applications;
- Interact with our platforms.

This may include technical and usage information.

From Third Parties

We may receive information from:

- Payment processors;
- Technology providers;
- Marketing platforms;
- Referral partners;
- Service providers.

Where appropriate, we take reasonable steps to ensure that such information is obtained lawfully.

6. WHY WE USE YOUR INFORMATION

We use personal information to:

- Provide services;
- Deliver coaching programmes;
- Manage user accounts;
- Process subscriptions;
- Process payments;
- Provide customer support;
- Improve products and services;
- Operate AI-enabled features;
- Communicate with users;
- Send marketing communications where permitted;
- Comply with legal obligations;
- Protect our business and users;
- Maintain platform security.

We will only process personal information where a lawful basis exists.

7. LAWFUL BASIS FOR PROCESSING

We may process personal information on the basis of:

- Your consent;
- Contractual necessity;
- Legal obligations;
- Legitimate business interests;
- Protection of legitimate interests.

The lawful basis may vary depending on the specific activity and relationship involved.

8. AI SERVICES AND DISCLOSURES

VAYU may utilise artificial intelligence ("AI") technologies as part of certain products, services, platform features, coaching tools, content generation processes, and user experiences.

AI functionality may be used to:

- Assist with goal setting;
- Support reflection and journaling activities;
- Provide educational content;
- Generate coaching prompts;
- Assist with habit development;
- Provide productivity assistance;
- Improve platform functionality.

Where AI-enabled services are provided:

- AI may process information submitted by users;
- AI-generated outputs may be stored in accordance with our retention practices;
- AI outputs may contain inaccuracies, omissions, or outdated information;
- AI should not be relied upon as professional legal, medical, financial, psychiatric, psychological, or other regulated professional advice.

Users remain responsible for exercising independent judgment when relying upon AI-generated content.

We seek to minimise unnecessary personal information processed through AI-enabled services and apply reasonable safeguards designed to protect user information.

9. SHARING OF PERSONAL INFORMATION

We do not sell personal information.

We may share personal information where reasonably necessary for business operations, service delivery, legal compliance, or platform functionality.

Recipients may include:

Service Providers

- Cloud service providers;
- Hosting providers;
- Customer support providers;
- Technology providers;
- Artificial intelligence providers.

Professional Advisors

- Accountants;
- Auditors;
- Legal advisors;
- Compliance consultants.

Payment and Financial Service Providers

- Banks;
- Payment processors;
- Financial service providers.

Regulatory and Legal Authorities

Where required by law, we may disclose information to:

- Courts;
- Regulatory authorities;
- Law enforcement agencies;
- Government authorities.

We seek to limit disclosures to information reasonably necessary for the relevant purpose.

10. INTERNATIONAL TRANSFERS OF INFORMATION

Some of our service providers operate internationally.

As a result, personal information may be transferred to, stored in, processed in, or accessed from jurisdictions outside South Africa.

These jurisdictions may include:

- United States of America;
- United Kingdom;
- European Union member states;
- Australia;
- Other jurisdictions utilised by approved service providers.

We take reasonable steps to ensure that information transferred internationally receives appropriate protection through contractual arrangements, vendor security controls, privacy commitments, and other reasonable safeguards.

11. HOW LONG WE KEEP INFORMATION

We retain personal information only for as long as reasonably necessary to:

- Deliver services;
- Fulfil contractual obligations;
- Meet legal requirements;
- Resolve disputes;
- Protect legitimate business interests;
- Maintain security and operational integrity.

Retention periods vary depending on the nature of the information.

Examples include:

- Financial and tax records;
- Coaching records;
- User account information;
- Customer support records;
- AI interaction records;
- Marketing records.

Where information is no longer required, it may be:

- Deleted;
 - Destroyed;
 - Anonymised;
 - De-identified.
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12. COOKIES, ANALYTICS AND SIMILAR TECHNOLOGIES

Our websites and platforms may utilise cookies and similar technologies.

These technologies help us:

- Maintain website functionality;
- Improve user experience;
- Understand usage patterns;
- Analyse performance;
- Improve security;
- Measure marketing effectiveness.

Depending on the platform, cookies may be categorised as:

Essential Cookies

Required for website or platform functionality.

Analytics Cookies

Used to understand user interactions and platform performance.

Marketing Cookies

Used to measure advertising effectiveness and improve marketing activities.

Users may manage cookie preferences through browser settings or available consent mechanisms.

Disabling certain cookies may affect functionality.

13. YOUR RIGHTS

Subject to applicable legal requirements, you may have the right to:

- Request access to your personal information;
- Request correction of inaccurate information;
- Request updating of information;
- Request deletion of information where legally permissible;
- Object to certain processing activities;
- Withdraw consent where consent is the lawful basis;
- Lodge a complaint regarding privacy concerns.

Requests may be directed to our Information Officer using the contact details provided in this Privacy Policy.

14. SECURITY OF YOUR INFORMATION

We implement reasonable technical and organisational measures designed to protect personal information against:

- Unauthorised access;
- Unauthorised disclosure;
- Loss;
- Misuse;
- Alteration;
- Destruction.

Security measures may include:

- Access controls;
- Password protection;
- Multi-factor authentication;
- Encryption technologies;
- Secure cloud infrastructure;
- Security monitoring;
- Vendor security reviews.

While we take reasonable precautions, no system can be guaranteed to be completely secure.

15. CHILDREN'S PRIVACY

Our services are generally intended for adults.

We do not knowingly collect personal information from children unless:

- Authorised by law;
- Authorised by a parent, guardian, or other competent person;
- Necessary for lawful service delivery.

Where we become aware that information relating to a child has been collected inappropriately, we will take reasonable steps to address the situation.

16. COMPLAINTS

If you have concerns regarding how your personal information has been processed, we encourage you to contact our Information Officer first.

Information Officer

Chris Roos

Email:

chris.roos@vayulifecoaching.co.za

Compliance Email:

compliance@vayulifecoaching.co.za

Telephone:

+27 62 732 1090

You may also lodge a complaint with the Information Regulator of South Africa.

Website:

<https://inforegulator.org.za>

Email:

POPIAComplaints@inforegulator.org.za

17. CHANGES TO THIS PRIVACY POLICY

We may update this Privacy Policy from time to time to reflect:

- Changes in legislation;
- Changes in our services;
- Changes in technology;
- Changes in operational practices;
- Changes in regulatory requirements.

The most recent version will be published on our websites and, where applicable, within our applications and platforms.

Continued use of our services following publication of an updated Privacy Policy may constitute acceptance of the revised policy, subject to applicable legal requirements.

18. CONTACT US

If you have any questions regarding this Privacy Policy or our privacy practices, please contact:

VAYU Coaching Technologies (Pty) Ltd

Physical Address:

134 Ranger Road
Fish Hoek
Cape Town
7975
Western Cape
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compliance@vayulifecoaching.co.za

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