

# Privacy Policy for Fundi Technology (Pty) Ltd t/a [www.topitup.io](http://www.topitup.io)

**Last Updated:** July 18, 2025

Fundi Technology (Pty) Ltd (trading as Topitup.io) is committed to protecting your personal information in compliance with South Africa's Protection of Personal Information Act, 4 of 2013 ("POPIA"). This policy explains what data we collect, how we use it, how we protect it, and your rights regarding your personal information.

## 1. Compliance

We comply with the Protection of Personal Information Act, 4 of 2013 (POPIA). Personal data is collected, processed, and stored lawfully, with appropriate consent or legitimate purpose, and used only for the purposes communicated to you.

## 2. Key Definitions under POPIA

**2.1 Personal Information:** Information relating to an identifiable, living natural person, and where applicable, an identifiable, existing juristic person.

This includes, but is not limited to:

- Name, email address, phone number, physical address, billing address.
- Financial information (though payment card details are handled by partners and not stored by us).
- Identifying numbers, online identifiers (e.g., IP address), location information.
- Transactional data (e.g., voucher purchase history, redemption usage).
- Technical data (e.g., browser/device info).

**2.2 Special Personal Information:** Sensitive categories of personal information, including religious or philosophical beliefs, race or ethnic origin, health or sex life, biometric information, criminal behavior, and personal information of children (under 18 years). We will only process such information under specific lawful conditions as permitted by POPIA.

**3 Data Subject:** The person to whom the personal information relates (i.e., you, the user)

- 4 **Responsible Party:** Fundi Technology (Pty) Ltd, as the entity that determines the purpose and means of processing personal information.
- 5 **Operator:** Any third party that processes personal information on behalf of Fundi Technology (Pty) Ltd (e.g., payment gateways, cloud service providers).

## 6 Conditions for Lawful Processing (The Eight Conditions)

Our processing of your personal information adheres to POPIA's eight conditions for lawful data processing:

- 6.1 **Accountability:** Fundi Technology (Pty) Ltd is responsible for ensuring compliance with all aspects of POPIA and has appointed an Information Officer to oversee this.
- 6.2 **Processing Limitation:** Personal information is processed reasonably, lawfully, and only to the extent that it is adequate, relevant, and not excessive for the purpose. Data is generally collected directly from you, the data subject.
- 6.3 **Purpose Specification:** Data is collected for a specific, explicitly defined, and lawful purpose related to Fundi Technology (Pty) Ltd's functions, and will not be retained longer than necessary for that purpose.
- 6.4 **Further Processing Limitation:** Any subsequent processing of personal information will be compatible with the initial purpose for which it was collected.
- 6.5 **Information Quality:** We take reasonable steps to ensure that personal data collected is accurate, complete, not misleading, and kept up-to-date.
- 6.6 **Openness:** We maintain documentation of all processing activities and provide transparent information to you about the collection and use of your personal data through this Privacy Policy.
- 6.7 **Security Safeguards:** We implement reasonable technical and organizational measures to protect collected data from loss, damage, unauthorized access, or disclosure. Procedures for notifying data subjects and the Information Regulator in case of a security breach are outlined in our Security Policy.
- 6.8 **Data Subject Participation:** We enable you to exercise your rights regarding your personal information, including access, correction, and objection.

## 4. Consent Mechanisms

Consent for processing personal information is voluntary, specific, and informed. You must actively provide consent (opt-in) for specific purposes, and consent is not made

conditional for using a product or service. You are made aware of what you are consenting to and how your data will be processed upfront.

## **5. Data Collection, Use, and Storage**

5.1 We collect information you provide to us (such as name, email address, phone number, billing address, and payment details). We also gather transactional data (e.g., voucher purchase history, redemption usage) and technical data (such as IP address and browser/device info) to operate the Site and improve our service. Payment card details are handled securely by our payment partners and are not stored on our servers.

5.2 Your personal information is used for the following specific purposes:

- To process orders, verify payments, and deliver voucher codes.
- To communicate order confirmations, support messages, and respond to inquiries.
- To improve our services and user experience.
- For fraud prevention, security (e.g., identity verification), and legal compliance (e.g., tax or regulatory reporting).
- We may use your email or phone (with consent) to send you updates or promotional offers.

5.3 Personal information will not be retained for longer than necessary to fulfill the purpose for which it was collected or as required by law.

## **6. Data Sharing and Third-Party Disclosure**

We will not sell your personal data. We may share information with our service providers (such as payment gateways and email hosts) who assist in operating our business, under strict confidentiality and POPIA-compliant agreements. We may also disclose data if required by law or to protect our rights. International data transfers, if any, will be conducted with adequate protection measures in place.

## **7. Security and Storage**

We implement appropriate technical and organizational measures to secure your data. This includes encryption of data in transit (HTTPS/SSL) and at rest, firewalls, access controls, and regular security audits. Our data storage is on secure servers, and backup copies are protected. We continuously review our security controls to ensure compliance with POPIA.

## 8. Data Retention Periods

We retain personal data only as long as needed for the purposes above or as required by law. When data is no longer required, we dispose of it securely.

Category of Data	Applicable Legislation/Purpose	Minimum Retention Period	Notes/Exceptions
<b>Personal Information</b>	POPIA, General Data Processing	Duration of research + 6 months (active), 12 months (inactive)	Secure deletion/anonymization after expiry unless legal hold
<b>Consent Records</b>	POPIA	7 years	To demonstrate lawful processing
<b>Financial Records</b>	Companies Act, VAT Act, FICA, CPA	7 years (Companies Act, Accounting Records, Financial Statements)	5 years (VAT Act, FICA, Co-operatives Act)
<b>Transaction Records</b>	FICA, General Business	5 years from conclusion of transaction (FICA)	7 years (Transaction-related Research)
<b>Customer Feedback/Survey Responses</b>	General Business, CPA	5 years (Customer Feedback, Survey Responses)	3 years (CPA - info provided to consumers)
<b>System Data</b>	POPIA, Security Best	Access Logs: 2 years	Security Audit Trails:

	Practices		5 years
<b>System Backups</b>	Security Best Practices	30-day rolling basis	Regularly tested and stored securely
<b>Error Logs</b>	System Operations	90 days	
<b>Legal Holds</b>	Litigation/Regulatory Investigations	Indefinite until hold lifted	Formal process for implementation, documentation, and review

## 9. Your Rights as a Data Subject

Under POPIA, you have the following rights regarding your personal information:

- **Right to be Informed:** You have the right to be notified when your personal information is being collected (including the purpose, source if not from you, responsible party's details, consequences of non-provision, retention period, and international transfer details). You also have the right to be notified of any unauthorized access to your personal information.
- **Right to Access:** You can request confirmation of whether Fundi Technology (Pty) Ltd holds your personal information and request access to a record or description of that information.
- **Right to Correction/Erasure:** You have the right to request the correction, updating, destruction, or deletion (erasure) of your personal information if it is inaccurate, incomplete, outdated, or no longer necessary for its purpose.
- **Right to Object:** You can object to the processing of your personal information in certain circumstances, particularly for direct marketing purposes.
- **Right to Complain:** You have the right to lodge a complaint with the South African Information Regulator (SAIR).

To exercise any of these rights, please contact our Information Officer at [funditechnologydev@gmail.com](mailto:funditechnologydev@gmail.com). We may require proof of identity to process your request. We will respond to your request as soon as reasonably practicable.

## 10. Cookie Policy

Our website uses cookies to enhance your browsing experience. Cookies are small text files placed on your device. We use:

- **Functional (Required) Cookies:** These are essential for the website to function correctly, including those necessary for basic site operation and analytics (if de-identified).
- **Analytical/Marketing Cookies:** For non-essential cookies, we will obtain your explicit, informed consent before deploying them. You will be presented with a clear choice to accept or reject these cookies, with a link to our full cookie policy for informed decision-making.

You can manage your cookie preferences through your browser settings or via a dedicated cookie consent tool on our website.