

# Privacy Policy

Effective date 30 October 2026

This Privacy Policy explains how Grosvenor Forex Services (Pty) Ltd (Grosvenor Forex) handles personal information when you use our website, contact us, become a client or use our foreign exchange intermediary services.

## 1. Responsible Party and contact

Grosvenor Forex is the Responsible Party under the Protection of Personal Information Act 4 of 2013 (POPIA) for personal information where we determine the purpose and means of processing.

Company: GROSVENOR FOREX SERVICES (PTY) LTD | Reg. No. 2001/022196/07 | FSP 40264

Physical, registered and postal address: 8 Columbia Crescent, Durban, 4302.

Website: [grosvenorforex.co.za](http://grosvenorforex.co.za)

General enquiries: [info@grosvenorforex.co.za](mailto:info@grosvenorforex.co.za). Telephone: 082 565 8822.

Information Officer: Douglas Haynes, Director.

Information Officer / POPIA enquiries: [doug@grosvenorforex.co.za](mailto:doug@grosvenorforex.co.za) | 082 565 8822.

## 2. Information we may collect

- Website and enquiry information, such as your name, contact details, company or role where provided, and the contents of your enquiry.
- Client identification and onboarding information, including personal, financial and business information; identity, address, authority to act, entity-registration and beneficial-ownership details; financial statements; and documents required for account opening and compliance checks.
- Transaction information, including bank and beneficiary details, payment instructions, amounts and currencies, payment purpose, source-of-funds information and supporting documents such as invoices or exchange-control documentation where required.
- Service records, including correspondence, instructions, confirmations, complaints and other records reasonably required to provide the service and account for our actions.

We collect client information directly from clients, including through Capitec Bank's required account-opening forms, to assist with opening a Capitec account for foreign exchange services. We do not obtain client information from Capitec Bank or other organisations. We also collect information when you contact us, submit an enquiry or give transaction instructions. Website enquiry information is used to respond to and handle the enquiry, and is not used for marketing.

Please do not submit unnecessary sensitive information or identity documents through a general website enquiry.

## 3. Why we use personal information

We process personal information for the following purposes, relying on the applicable lawful ground under section 11 of POPIA:

- Contractual arrangements: to take steps at your request towards a contract or perform our agreement with you, including onboarding, arranging requested foreign exchange services and communicating about transactions.
- Legal obligations: to carry out required identification and regulatory checks, keep statutory records and meet applicable FICA, FAIS and exchange-control obligations.
- Legitimate interests: where necessary and lawful, to respond to enquiries, protect our services against fraud or misuse, deal with complaints and establish, exercise or defend legal rights.
- Consent: where consent is required, for the specific purpose explained when it is requested. Consent may be withdrawn, without affecting prior lawful processing or processing supported by another lawful ground.

Submitting a general website enquiry is voluntary. We need sufficient contact details and information about your enquiry to respond; without them we may be unable to assist. Client identification, beneficial-ownership and transaction information required under the Financial Intelligence Centre Act 38 of 2001, FAIS or exchange-control requirements is mandatory where those requirements apply. If required information is not provided, we may be unable, or legally prohibited, to onboard you or carry out a transaction.

Using the website does not amount to blanket consent to unrelated processing. Our direct-marketing position is addressed in section 9.

## 4. Sharing and cross-border processing

Grosvenor Forex is an authorised intermediary of Capitec Bank. We share client account-opening and foreign exchange information with Capitec Bank to arrange the requested services. Hosting, email and IT service providers may process information as needed to support our communications, systems and records. Information may also be disclosed to

regulators, the Financial Intelligence Centre, an Ombud, courts or other competent authorities where required or permitted by law.

Relevant client information may be made available to our external compliance consultant for compliance reviews, subject to confidentiality and data-protection requirements.

For international payments, Capitec Bank transmits payment information to overseas banks through SWIFT, and those messages may contain personal information required to process the transaction. The Company's email and certain IT services may involve processing outside South Africa, including storage in Europe. Where Grosvenor Forex transfers personal information outside South Africa, it does so in accordance with section 72 of POPIA, including where the transfer is necessary to perform a contract with the data subject or where the recipient is subject to adequate data-protection safeguards.

## 5. Website technology

Our website does not currently use cookies, browser storage, advertising pixels, behavioural tracking or non-essential analytics technologies. The website itself does not maintain a database of enquiry submissions.

The website is hosted by Vercel. Vercel and other hosting and IT service providers may process IP addresses, approximate location, browser/device information and technical or security logs to deliver, secure and troubleshoot the website. The server-side enquiry function is configured to execute in Cape Town, South Africa.

Website enquiries are submitted through a server-side form and delivered to [info@grosvenorforex.co.za](mailto:info@grosvenorforex.co.za) through Microsoft Graph within Grosvenor Forex's Microsoft 365 environment. The website does not retain a database copy of enquiry submissions. Enquiry information is used to respond to and handle the enquiry and is not used for electronic direct marketing.

Technical logs may be generated for security and troubleshooting and are limited to information reasonably necessary for those purposes. They are not intended to record the content of an enquiry.

If we introduce non-essential analytics, advertising technologies or similar tracking, we will update this policy and implement any required notices or consent arrangements before using them.

## 6. Security and retention

Grosvenor Forex's security policy requires appropriate and reasonable safeguards against loss, unauthorised access, alteration or disclosure. Access must be limited to authorised persons who need the information for their work. The Information Officer oversees the handling of personal information and secure disposal. Service providers must protect personal information and meet applicable confidentiality and POPIA requirements, including written operator agreements where required.

Email and enquiry information is handled within Grosvenor Forex's Microsoft 365 environment. Access is restricted to authorised users and service providers who require it for legitimate business, support or administrative purposes, with authentication and access-control safeguards in place.

Capitec Bank manages its own account-opening forms and related systems. Its privacy notice explains its processing of personal information. Grosvenor Forex remains responsible for the personal information it processes.

Our standard retention period for client and transaction information, including account-opening records, is five years after the last transaction, subject to applicable legal requirements. Under section 23 of FICA, relevant records must be retained for at least five years after the business relationship ends (relationship-establishment records), the transaction concludes (transaction records), or the section 29 report is submitted (records relating to the reported activity). A later legal deadline or lawful preservation requirement takes precedence.

Other personal information is retained only for as long as necessary for its purpose or as required or permitted by law. Information must not be retained unnecessarily.

Our retention and destruction policy requires records to be securely destroyed, deleted or de-identified as soon as reasonably practicable after the retention period expires and no lawful reason for keeping them remains. Destruction or deletion must prevent reconstruction in an intelligible form. The Information Officer oversees this process.

## 7. Your rights

Subject to POPIA and applicable access rules, you may ask whether Grosvenor Forex holds personal information about you, request access to it, request correction or deletion where permitted, object to qualifying processing, object to direct marketing, or withdraw consent where consent is the basis for processing. Grosvenor Forex will need to verify your identity or authority before acting on a request.

To exercise these rights, contact the Information Officer using the details in section 1. Access to records and prescribed request procedures are also addressed in Grosvenor Forex's Combined PAIA & POPIA Manual.

Combined PAIA & POPIA Manual and applicable forms: <https://grosvenorforex.co.za/compliance>.

## 8. Privacy complaints

Questions, requests or complaints about personal information may be directed to the Information Officer using the direct email address or telephone number in section 1. You may also lodge a complaint with the Information Regulator (South Africa) if you believe your personal information has been processed unlawfully.

Information Regulator | 010 023 5200 | [enquiries@inforegulator.org.za](mailto:enquiries@inforegulator.org.za) | POPIA complaints:  
[POPIAComplaints@inforegulator.org.za](mailto:POPIAComplaints@inforegulator.org.za) | [www.inforegulator.org.za](http://www.inforegulator.org.za)

## 9. Direct marketing

Grosvenor Forex does not conduct electronic direct marketing. We do not use website enquiry details to send promotional emails, SMSs, WhatsApp messages or other electronic marketing communications.

We may update this policy when our services, processing activities or applicable requirements change. The current version and effective date will be published on our website.