

PRIVACY POLICY

TOHI WELLNESS

Privacy Notice

Who are we and what do we do?

Tohi Wellness gathers and processes personal information in accordance with this privacy notice and in compliance with the relevant data protection regulation and laws. This notice provides the necessary information regarding your rights and our obligations, and explains how, why and when we process your personal data, with whom we may share that information and how we keep it secure.

We are happy to provide any additional information or explanation needed. Any requests for this should be sent to our Data Controller who can be contacted at info@lightworkers.co.za. We keep our Privacy Notice under regular review. This Privacy Notice was last reviewed in May 2025.

What information is being collected?

Tohi Wellness processes your personal information to meet our legal, statutory and contractual obligations and to provide you with our products and services. We will never collect any unnecessary personal data from you and do not process your information in any way, other than as specified in this notice.

We receive, collect and store any information you enter on our website or provide us in any other way. In addition, we collect the Internet protocol (IP) address used to connect your computer to the Internet; login; e-mail address; password; computer and connection information and purchase history.

We may use software tools to measure and collect session information, including page response times, length of visits to certain pages, page interaction information, and methods used to browse away from the page.

We also collect personally identifiable information (including name, email, password, communications); payment details (including credit card information), comments, feedback, product reviews, recommendations, and personal profile.

How is the information being collected?

You provide us with personal data in the following ways:

- Via online forms, website forms and orders.
- By giving credit card details, online payment and setting up direct debit.
- Coaching agreement, pre- and post- coaching forms.

- During a coaching session, through email or over the telephone.

How will we use Your Personal Data?

Tohi Wellness takes your privacy very seriously and will never disclose, share or sell your data without your consent, unless required to do so by law. We only retain your data for as long as is necessary and for the purposes specified in this notice. Where you have consented to us providing you with promotional offers and marketing, you are free to withdraw this consent at any time. The purposes and reasons for processing your personal data are detailed below:

- We collect your personal data in the performance of a contract or to provide a service.
- We collect and store your personal data as part of our legal obligation for business accounting.
- We will occasionally send you marketing information where we have assessed that it is beneficial to you as a client or prospective member and in your interests. Such information will be non-intrusive and is processed on the grounds of legitimate interests.
- To create aggregated statistical data and other aggregated and/or inferred Non-personal Information, which we or our business partners may use to provide and improve our respective services.
- To comply with any applicable laws and regulations.

Who will your data be shared with?

We will keep information about you confidential. We will only disclose your information with other third parties with your express consent with the exception of the following categories of third parties:

- Any contractors and advisors that provide a service to us or act as our agents on the understanding that they keep the information confidential e.g. bookkeeper
- Anyone to whom we may transfer our rights and duties under any agreement we have with you.
- Any legal or crime prevention agencies and/or to satisfy any regulatory request (e.g. CNHC) if we have a duty to do so or if the law allows us to do so.

What are your Rights?

You have the right to access any personal information Tohi Wellness processes about you and to request information about:

- What personal data we hold about you.
- The purposes of the processing.
- For how long we intend to store your personal data.

If you believe that we hold any incomplete or inaccurate data about you, you have the right to ask us to correct and/or complete the information and we will strive to do so as quickly as possible; unless there is a valid reason for not doing so, at which point you will be notified.

You also have the right to request erasure of your personal data or to restrict processing (where applicable) in accordance with the data protection laws; as well as to unsubscribe to any direct marketing from us.

What safeguards are in place to ensure data that identifies me is secure?

Tohi Wellness only uses information that may identify you in accordance with GDPR. This requires us to process personal data only if there is a legitimate basis for doing so and that any processing must be fair and lawful.

Our company is hosted on the [Webpartner.co.za](https://webpartner.co.za) platform. [Webpartner.co.za](https://webpartner.co.za) provides us with the online platform that allows us to sell our products and services to you. Your data may be stored through [Webpartner.co.za](https://webpartner.co.za)'s data storage, databases and the general [Webpartner.co.za](https://webpartner.co.za) applications. They store your data on secure servers behind a firewall.

All direct payment gateways offered by [Webpartner.co.za](https://webpartner.co.za) and used by our company adhere to the standards set by PCI-DSS as managed by the PCI Security Standards Council, which is a joint effort of brands like Visa, MasterCard, American Express and Discover. PCI-DSS requirements help ensure the secure handling of credit card information by our store and its service providers.

We take your privacy seriously and take every reasonable measure and precautions to protect and secure your personal data, including restricted access, IT authentication, firewalls and anti-virus/malware protection. We also ensure the information we hold is kept in secure locations, restrict access to information to authorised personnel and contractors only, protect personal and confidential information held on equipment such as laptops with encryption (which masks data so that unauthorised users cannot see or make sense of it). We ensure external data processors that support us are legally and contractually bound to operate and prove security arrangements are in place where data that could or does identify a person are processed.

Transfers Outside the EU

Tohi Wellness may utilise some products or services (or parts of them) that may be hosted/stored in non-EU countries, which means that we may transfer any information which is submitted by you through the website outside the European Economic Area ("EEA"), including

Therefore, when you use our website/send us an email, the personal information you submit may be stored on servers which are hosted in non-EU countries. Where this is the case, we have taken steps to ensure that those providers use the necessary level of protection for your information and abide by strict agreements and measures set out by Tohi Wellness to protect your data and comply with the relevant data protection laws.

How Long We Keep Your Data?

Tohi Wellness only ever retains personal information for as long as is necessary.

Where you have consented to us using your details for direct marketing, we will keep such data until you notify us otherwise and/or unsubscribe.

We will keep members' data for the duration of being a member and 7 years thereafter.

We will keep client enquiry data until you unsubscribe from marketing emails.

Website technical details

Forms - We do use electronic forms on our website making use of an available 'forms module', which has a number of built-in features to help ensure privacy. We also aim to use secure forms where appropriate.

Cookies – We use cookies on this website. Cookies are small. We do not make use of cookies to collect any private or personally-identifiable information. The technical platform of this website uses cookies solely to aid the proper technical functioning of the website. The cookies used contain random strings of characters alongside minimal information about the state and session of the website – which in no way collects or discloses any personal information about you as a visitor.

Advanced areas of this site may use cookies to store your presentation preferences in a purely technical fashion with no personally-identifiable information. Note also our statement on analytics software below, as analytics software also uses cookies to function.

Most web browsers allow some control of most cookies through the browser settings. To find out more about cookies, including how to see what cookies have been set and how to manage and delete them, visit www.allaboutcookies.org.

Links to other websites

Our website may contain links to other websites of interest. However, once you have used these links to leave our site, you should note that we do not have any control over those other websites. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this privacy statement. You should exercise caution and look at the privacy statement applicable to the website in question.

Complaint

Tohi Wellness only processes your personal information in compliance with this privacy notice and in accordance with the relevant data protection laws. If, however you wish to raise a complaint regarding the use of your personal data then please contact us by writing to the Data Controller at info@lightworkers.co.za

and we will do our best to help you.

If your complaint is not resolved to your satisfaction and you wish to make a formal complaint to the Information Commissioner's Office (ICO), you can contact them on 01625 545745 or 0303 1231113.