



ELEVYX WELLNESS

Mental Wellness Coaching & Behavioural Support

PRIVACY POLICY

In terms of the Protection of Personal Information Act 4 of 2013 (POPIA)

Version: Version 1.0 | Effective Date: 15 May 2026 | Last Reviewed: 15 May 2026
Elevyx (PTY) Ltd t/a Elevyx Wellness | Richards Bay, KwaZulu-Natal, South Africa

1. Introduction & Purpose

Elevyx (PTY) Ltd, trading as Elevyx Wellness ("Elevyx Wellness", "we", "us", or "our"), is committed to the responsible, ethical, and lawful processing of personal information. This Privacy Policy sets out how we collect, use, store, protect, share, and dispose of personal information in compliance with the Protection of Personal Information Act 4 of 2013 ("POPIA") and any applicable regulations promulgated thereunder.

This policy applies to all clients, prospective clients, website visitors, members, students, parents and legal guardians, and any other natural or juristic person whose personal information is processed by Elevyx Wellness.

2. Business & Contact Information

Registered Entity: Elevyx (PTY) Ltd

Trading Name: Elevyx Wellness

Responsible Party: Dean Johnston (Director)

Email: dean.elevyx@gmail.com

Contact Number: +27 60 392 2616

Website: <https://deanelevyx.wixsite.com/elevyxmentalhealth>

Address: Richards Bay, KwaZulu-Natal, South Africa

3. Nature of Services

Elevyx Wellness provides professional non-clinical mental wellness coaching, behavioural support, burnout recovery facilitation, stress and anxiety management coaching, depression-related psychoeducational support, student subject choice guidance, certified and behavioural assessments, wellness debriefs, and related developmental and educational services.



IMPORTANT DISCLAIMER: Elevyx Wellness does not provide clinical treatment, psychiatric diagnosis, psychotherapy, or emergency crisis intervention. Dean Johnston is certified to conduct assessments and debriefs in accordance with his qualifications. Where clinical or psychiatric intervention is identified as necessary, clients will be referred to an appropriately registered and licensed professional.

4. Information We Collect

We may collect and process the following categories of personal and, where applicable, special personal information:

4.1 General Personal Information

- Full name and surname
- Date of birth and identity number (where required)
- Gender (where relevant to service delivery)
- Email address and telephone/WhatsApp number
- Residential or postal address
- Emergency contact details
- Parent or legal guardian information (for minor clients)

4.2 Service & Session Information

- Session notes and progress records
- Behavioural assessment responses and results
- Wellness disclosures and self-reported health information
- Educational background and subject choice information
- Membership and subscription records
- Client communications and correspondence

4.3 Special Personal Information

Where clients voluntarily disclose information relating to mental health, physical health, or other special categories of personal information as defined in section 26 of POPIA, we process such information solely for the purpose of providing appropriate support and facilitating professional referrals where necessary. Consent will be obtained prior to processing such information.

4.4 Technical & Website Information

- Website contact form submissions
- IP address and device/browser information
- Google Analytics usage and traffic data
- Cookie and session data

5. Lawful Basis for Processing

Elevyx Wellness processes personal information on the following lawful bases in terms of POPIA:

- Consent of the data subject (section 11(1)(a) of POPIA)
- Performance of a contract to which the data subject is party (section 11(1)(b))
- Compliance with a legal obligation applicable to Elevyx Wellness (section 11(1)(c))



- Legitimate interests pursued by Elevyx Wellness that are balanced against the rights of the data subject (section 11(1)(f))
- Protection of the legitimate interests of the data subject (section 11(1)(e))

6. How We Collect Personal Information

Personal information is collected through the following channels:

- Wix website contact and intake forms
- Email and WhatsApp communications
- Direct client consultation and intake processes
- Carepatron CRM platform (secure client record management)
- Certified psychometric and behavioural assessment tools
- Parent or legal guardian submission forms
- Blog subscriptions and mailing list sign-ups
- Google Analytics and website cookies

7. Purpose of Processing

Personal information is collected and processed for the following legitimate purposes:

- Delivery of agreed mental wellness coaching and behavioural support services
- Scheduling, coordination, and administration of appointments and sessions
- Conducting certified psychometric assessments and providing structured debriefs
- Communicating session outcomes, recommendations, and progress updates
- Membership and subscription administration
- Communication with parents or legal guardians where the client is a minor
- Client safety management and appropriate professional referral
- Compliance with applicable legal and ethical obligations
- Internal recordkeeping and quality assurance
- Professional awareness and marketing activities (subject to consent)
- Website analytics and ongoing service improvement

8. Confidentiality

Confidentiality is a core ethical principle of Elevyx Wellness. All personal and sensitive information shared by clients in the course of service delivery is treated with the highest degree of professional discretion. We implement reasonable and appropriate administrative, technical, and physical safeguards to protect client confidentiality at all times.

All information is stored primarily within the Carepatron CRM system and associated secure operational platforms.

9. Limits to Confidentiality

Notwithstanding the above, Elevyx Wellness may be required or ethically obligated to disclose personal information without client consent in the following exceptional circumstances:

- Where there is a credible risk of serious harm to the client or to a third party
- Where there is a reasonable suspicion of child abuse, neglect, or exploitation involving a minor



- Where a court order or other lawful legal directive compels disclosure
- Where statutory reporting obligations under applicable South African law apply
- Where disclosure is necessary to facilitate an urgent and appropriate professional referral in the interests of the client's safety or wellbeing

Where possible and appropriate, clients will be informed of any intended disclosure in advance.

10. Carepatron CRM Platform

Elevyx Wellness utilises Carepatron as its primary client relationship management platform for the secure storage of client records, session notes, assessments, and related service documentation. Clients acknowledge that Carepatron operates under its own privacy, security, and data processing policies. Elevyx Wellness exercises reasonable care in selecting and utilising reputable third-party platforms for client data management.

11. Website Cookies & Analytics

Our Wix website may utilise cookies, Google Analytics, and associated tracking technologies to improve website performance, analyse visitor behaviour, monitor traffic patterns, and enhance the overall user experience. Clients and visitors may manage their cookie preferences through their browser settings and any cookie notice displayed on the website.

12. Marketing & Communications

Elevyx Wellness communicates professionally via Facebook, LinkedIn, email, and direct messaging platforms for awareness, educational, and service-related purposes. Any future newsletters, promotional communications, or marketing materials will be issued only to clients and contacts who have provided explicit consent. Clients retain the right to withdraw consent and unsubscribe at any time.

Elevyx Wellness does not sell, rent, or otherwise transfer personal information to third parties for commercial marketing purposes.

13. Information Sharing

Elevyx Wellness does not share personal information with third parties except in the following circumstances:

- With the informed and explicit consent of the client
- With parents or legal guardians where the client is a minor and where legally and ethically appropriate
- For the purpose of appropriate professional referral in the interests of the client
- Where required by applicable law, regulation, or lawful court order
- Where disclosure is necessary to fulfil a bona fide safety obligation
- With authorised third-party service providers strictly necessary for service delivery (e.g., Carepatron, Google Workspace)

14. Minor Clients

Where services are provided to clients under the age of 18 ("minor clients"), appropriate written consent shall be obtained from a parent or legal guardian prior to the commencement of services,



data collection, or assessment activities. Such consent will be obtained in a manner consistent with the Children's Act 38 of 2005 and the provisions of POPIA relating to the personal information of children.

15. International Clients

While Elevyx Wellness primarily serves clients within the Republic of South Africa, remote services may be accessed by international clients. By engaging with our services from outside South Africa, international clients acknowledge that their personal information will be processed in accordance with South African law, including POPIA, and the operational frameworks of Elevyx Wellness.

16. Data Security

Elevyx Wellness takes reasonable and proportionate technical, physical, and administrative measures to protect personal information against loss, damage, unauthorised access, unlawful processing, disclosure, and alteration. These measures are reviewed periodically and updated as appropriate.

Clients are advised that no digital system or online platform can guarantee absolute security. Elevyx Wellness shall not be held liable for data breaches or losses arising from factors beyond its reasonable control, provided that it has taken appropriate security measures.

17. Record Retention & Disposal

Personal information is retained for as long as reasonably necessary to fulfil the purposes for which it was collected, including the following:

- The duration of the professional service relationship
- Compliance with applicable legal, regulatory, and ethical recordkeeping obligations
- Resolution of any disputes or complaints
- Internal operational and quality assurance purposes

Upon expiry of the applicable retention period, personal information will be securely destroyed or de-identified in accordance with POPIA and applicable best practice.

18. Rights of Data Subjects (POPIA)

In terms of POPIA, clients and data subjects have the following rights in relation to their personal information held by Elevyx Wellness:

- The right to request access to personal information held about them
- The right to request the correction or updating of inaccurate, incomplete, or outdated personal information
- The right to request the deletion or destruction of personal information, subject to applicable legal obligations
- The right to object to the processing of personal information on reasonable grounds
- The right to withdraw consent to processing, where processing is based on consent
- The right to lodge a complaint with the Information Regulator of South Africa

Requests to exercise these rights should be directed in writing to: dean.elevyx@gmail.com. Elevyx Wellness will respond within a reasonable timeframe and in accordance with POPIA.



The Information Regulator of South Africa may be contacted at: infoereg@justice.gov.za | +27 12 406 4818

19. Third-Party Platforms

Elevyx Wellness may utilise the following third-party platforms in the course of service delivery, each of which operates under its own privacy and data processing policies:

- Wix — website hosting and online contact management
- Carepatron — secure client records and session management
- Google Workspace — internal communication and documentation
- Facebook & LinkedIn — professional social media engagement

Clients are encouraged to review the relevant privacy policies of these third-party platforms directly.

20. Amendments to This Policy

Elevyx Wellness reserves the right to amend this Privacy Policy from time to time to reflect changes in applicable law, regulatory requirements, or operational practice. The current version of this policy will be made available on our website and upon request. Material amendments will be communicated to clients directly where reasonably practicable.

21. Complaints & Enquiries

Any privacy-related complaints, access requests, or enquiries should be directed to the Responsible Party:

Responsible Party: Dean Johnston — Elevyx (PTY) Ltd t/a Elevyx Wellness

Email: dean.elevyx@gmail.com

Contact Number: +27 60 392 2616

Website: <https://deanelevyx.wixsite.com/elevyxmentalhealth>

Complaints that are not resolved to your satisfaction may be referred to the Information Regulator of South Africa.

POPIA COMMITMENT: Elevyx Wellness is committed to the responsible and ethical processing of all personal information entrusted to it. We respect the dignity, privacy, and rights of every individual and take our obligations under POPIA seriously. This policy reflects our ongoing commitment to lawful, fair, and transparent data practices.

AUTHORISED SIGNATORY

Name: Dean Johnston

Designation: Director & Responsible Party — Elevyx (PTY) Ltd

Date: May 2026

