

Privacy Notice

How Minitzers Inc. collects, uses, shares, protects and retains personal information

AT A GLANCE

- We process personal information only for legitimate legal, regulatory and business purposes.
- Client confidentiality and legal professional privilege remain fundamental to our work.
- We do not sell personal information.
- You may ask to access or correct your personal information, object to certain processing, or complain to the Information Regulator.

Responsible party	Minitzers Incorporated (Minitzers Inc.)
Effective date	29 September 2026
Version	1.0
Applies to	Clients, prospective clients, website users, event participants, counterparties, suppliers, applicants and other people whose information we process

This is Minitzers Inc.'s general privacy notice. A matter-specific, service-specific or event-specific notice may supplement it. If there is an inconsistency, the more specific notice applies to that processing.

1. Purpose and scope

Minitzers Inc. respects privacy and is committed to processing personal information lawfully, reasonably, transparently and securely. This notice explains our practices under the Protection of Personal Information Act 4 of 2013 (POPIA), read with other laws and professional duties that apply to a South African legal practice.

It applies when we act as the responsible party for personal information processed through our legal practice, offices, website, electronic communications, consultations, transactions, events and business operations. It also applies where information reaches us indirectly—for example through a client, estate agent, bank, counterparty, public register or another professional adviser.

This notice does not override legal professional privilege, client confidentiality, court rules, statutory reporting duties or any lawful restriction on access to information.

2. Who is responsible for your information?

Minitzers Incorporated, trading as Minitzers Attorneys, is the responsible party for the processing described in this notice unless we tell you otherwise.

Head office	Third Floor, Arcade House, 4 New Street, Paarl, 7646
Val de Vie office	Unit C208, Polo Village Offices, Val de Vie, Paarl, 7646
Telephone	021 871 1224
Email	property@minitzers.co.za

Privacy or POPIA enquiries should be addressed to “The Information Officer” using the contact details above. Please identify the request as a privacy enquiry so that it can be routed correctly.

3. Whose information do we process?

Depending on the matter or interaction, we may process information about:

- clients, prospective clients and their representatives, directors, members, trustees, partners, shareholders, beneficial owners and employees;
- sellers, purchasers, property owners, tenants, landlords, developers, lenders, borrowers, agents, brokers and other participants in property or commercial transactions;
- opposing parties, counterparties, witnesses, experts, counsel, correspondents, family members, heirs, beneficiaries, executors and other persons connected to a legal matter;
- website users, people who contact us, and registrants, guests and attendees at seminars, masterclasses or other events;
- suppliers, service providers, professional advisers and business contacts; and
- job applicants, employees, former employees and contractors.

4. What personal information do we collect?

We collect only information that is adequate, relevant and reasonably necessary for the purpose concerned. This may include:

Category	Examples
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Category	Examples
Identity and contact	Names, identity or passport details, date of birth, photographs, signatures, addresses, telephone numbers, email addresses and preferred language.
FICA and verification	Citizenship, residency, occupation, source of funds or wealth, beneficial ownership, sanctions or politically exposed person information, proof of address and verification records.
Financial and tax	Banking details, payment records, invoices, trust-account information, tax numbers, tax status and transaction values.
Property and transaction	Property descriptions, title deeds, valuations, municipal and levy information, sale or finance terms, bond information and supporting transaction documents.
Personal, family and estate	Marital status, matrimonial-property information, family relationships, wills, estate information, succession details and information about dependants or beneficiaries.
Legal matter	Instructions, facts, documents, evidence, opinions, pleadings, correspondence, recordings, notes and information about disputes, claims, offences or proceedings.
Digital and communications	Emails, messages, call details, IP address, device and browser information, website activity, cookies and security logs.
Events and enquiries	Registration details, attendance, guest information, property-selling timeframe, preferences, questions, feedback and communication choices.
Employment and suppliers	Qualifications, work history, references, screening information, contracts, payment details and performance or compliance records.

Special personal information and children

A legal matter may require information about health, race or ethnic origin, religious or philosophical beliefs, trade-union membership, political persuasion, sex life, biometric information, criminal behaviour, or a child. We process such information only where POPIA permits it and where reasonably necessary for legal services, legal claims, compliance, the protection of a person's legitimate interests, or another lawful purpose.

5. Where do we obtain information?

We may obtain personal information:

- directly from you, including through forms, consultations, correspondence, our website, event registration and documents you provide;
- from a client or another person involved in or connected to a matter;
- from estate agents, financial institutions, insurers, accountants, auditors, counsel, correspondents, experts and other professional advisers;
- from public or official sources such as the Deeds Office, Companies and Intellectual Property Commission, South African Revenue Service, municipalities, courts, the Master of the High Court and other registries or regulators;
- from identity-verification, fraud-prevention, sanctions-screening and similar lawful compliance sources; and
- automatically when you use our website or communicate through digital systems, subject to applicable law and your settings.

6. Why do we process personal information?

Purpose	What this includes
Legal services	To consider an enquiry, open and manage a file, take instructions, advise, draft, negotiate, litigate, register, transfer, administer, report and close a matter.
Identity, conflicts and compliance	To identify and verify people, conduct conflict checks, comply with FICA, court rules, tax and reporting duties, and meet professional or regulatory obligations.
Transactions and payments	To administer conveyancing, bonds, estates, trusts, companies, contracts, trust money, invoices, payments, recoveries and accounting records.
Communication	To arrange appointments, provide updates, answer enquiries, deliver documents, obtain information and communicate about matters, services or events.
Events	To assess and administer registrations, allocate places, manage guests and attendance, send practical updates, respond to questions, and follow up where the attendee requested it or where otherwise lawful.
Operations and security	To operate and improve our practice, manage suppliers, maintain systems, prevent fraud, protect people and property, investigate incidents and preserve business continuity.
Recruitment and employment	To evaluate applications, verify information, manage employment relationships and meet employment, tax and occupational obligations.

Purpose	What this includes
Marketing	To send relevant service, event or legal-update communications where permitted by POPIA, including where you have consented or are an existing client and the law permits the communication.
Legal claims and public interest	To establish, exercise or defend legal rights; respond to lawful requests; and cooperate with courts, regulators or law-enforcement bodies when legally required or permitted.

7. Our legal grounds for processing

Under POPIA, we rely on one or more lawful grounds appropriate to the circumstances:

Consent. You have freely agreed to the processing. You may withdraw consent, but withdrawal does not affect prior lawful processing and may limit what we can do for you.

Contract or requested steps. Processing is necessary to perform a contract with you or to take steps at your request before entering into one.

Legal obligation. Processing is required by law, court order, professional rule or a binding regulatory duty.

Protection of a legitimate interest. Processing is necessary to protect your legitimate interests or those of another person.

Our legitimate interests or those of a third party. Processing is necessary for a lawful and reasonable business or professional purpose, balanced against your rights and reasonable expectations.

We do not treat consent as the only possible basis for processing. In legal practice, some processing must continue even if consent is withdrawn—for example to comply with FICA, preserve privileged records, maintain trust-account records, respond to a regulator or defend a legal claim.

8. Is the information mandatory?

Some information is voluntary. Other information is required by law, professional rules, a contract, a court process or the practical requirements of a matter. We will ordinarily indicate when information is required. If required information is not provided, we may be unable to accept instructions, complete verification, act in a transaction, make a payment, reserve an event place or provide the requested service.

9. When do we share personal information?

We do not sell personal information. We disclose it only when reasonably necessary, legally permitted and consistent with our duties of confidentiality and privilege. Depending on the matter, recipients may include:

- our directors, legal practitioners, candidate legal practitioners, paralegals and authorised support personnel;
- counsel, correspondent attorneys, notaries, conveyancers, sheriffs, experts, translators and other professional advisers;
- banks, bond originators, insurers, auditors, accountants and payment or trust-account service providers;
- the Deeds Office, SARS, municipalities, body corporates, homeowners' associations, CIPC, the Master of the High Court, courts and other public bodies or registries;
- parties and authorised participants in a transaction or legal process, including estate agents, counterparties and their advisers, where disclosure is necessary and lawful;

- the Financial Intelligence Centre, Legal Practice Council, Information Regulator, law-enforcement agencies and other authorities where reporting or disclosure is required or permitted; and
- reputable operators that provide document storage, cloud hosting, communications, IT support, cybersecurity, identity verification, event administration, archiving, shredding or other operational services.

Our operators may process information only under our authority and must protect it appropriately. A recipient may also be independently responsible for its own processing under law.

10. Legal privilege and confidentiality

Nothing in this notice waives legal professional privilege or reduces our professional duty to preserve client confidentiality. We may withhold or restrict access to information where the law permits or requires this, including to protect privilege, another person's rights, confidential commercial information, legal proceedings, security, or a statutory reporting restriction.

11. Cross-border processing

Some service providers or recipients may store or process information outside South Africa. We transfer personal information across borders only where section 72 of POPIA permits it—for example where the recipient is subject to an adequate law, binding corporate rules or an agreement that provides substantially similar protection; where you consent; where the transfer is necessary for a contract or your benefit; or where another statutory ground applies. We take reasonable steps to assess and manage cross-border risk.

12. How do we protect information?

We use reasonable and appropriate technical and organisational safeguards having regard to the nature of the information, the risks, available technology and cost. Measures may include:

- role-based access, authentication, password controls and user-account management;
- secure systems, malware protection, backups, patching, monitoring and controlled remote access;
- physical access controls, secure filing, clean-desk practices and confidential disposal;
- confidentiality duties, staff awareness, internal procedures and incident escalation;
- due diligence and contractual safeguards for operators and service providers; and
- periodic review of risks, safeguards and information-handling practices.

No system is completely secure. If we have reasonable grounds to believe that unauthorised access or acquisition has occurred, we will investigate and notify the Information Regulator and affected data subjects as required by POPIA, subject to lawful delay or exceptions.

13. How long do we retain information?

We keep personal information only for as long as reasonably necessary for the purpose for which it was collected, or as required or permitted by law, professional rules, court requirements, contractual obligations, limitation periods, audit needs, dispute resolution, fraud prevention or the establishment, exercise or defence of legal claims.

Retention periods differ by record. For example, FICA identification and transaction records are generally retained for at least five years from the relevant event prescribed by that legislation. A longer period may apply to legal files, trust-account records, deeds, wills, securities, tax records, employment records or litigation material. When retention is no longer justified, we securely destroy, delete or de-identify the information, subject to practical limits in backups and archives.

14. Direct marketing and event communications

Operational communications about an enquiry, instruction, transaction, registration or event are not necessarily marketing. We may use the contact details you provide to administer that interaction—for example to confirm a Masterclass place, send venue information, manage attendance or answer a question.

We send unsolicited electronic direct marketing only where POPIA permits it. This ordinarily means that you have consented, or that you are an existing client and the communication concerns our own similar services within the limits of section 69 of POPIA. Each eligible marketing communication will identify us and provide a reasonable way to opt out. You may object or unsubscribe at any time, free of charge. We will retain a minimal suppression record where necessary to honour your choice.

Registering for an event does not, by itself, authorise Minitzers Inc. to give your information to estate agents or other third parties for their marketing or referral purposes. If a separate introduction, referral or marketing consent is proposed, it will be requested distinctly and may be refused without affecting the event registration, unless the specific event terms clearly state otherwise.

15. Website, cookies and links

Our website may use essential cookies and similar technologies needed for security, navigation and functionality. It may also use analytics or other non-essential technologies where permitted and, when required, with your choice or consent. Browser settings may allow you to block or delete cookies, although some functions may then not work properly.

Our website or communications may link to third-party sites or services. Their privacy practices are their own, and we encourage you to read their notices before providing information.

16. Automated decision-making

Minitzers Inc. does not ordinarily make decisions that produce legal effects or substantially affect a person solely through automated processing. If this changes for a particular service, we will provide appropriate information and safeguards as required by POPIA.

17. Your rights

Subject to POPIA, PAIA and other applicable law, you may:

Ask whether we hold your personal information. and request access to it, subject to lawful grounds for refusal and any prescribed process or fee.

Request correction or deletion. where information is inaccurate, irrelevant, excessive, out of date, incomplete, misleading, unlawfully obtained or no longer authorised to be retained.

Object to processing. on reasonable grounds where POPIA allows, or object at any time to direct marketing.

Withdraw consent. where consent is the basis for processing, without affecting processing already carried out lawfully.

Ask for evidence of consent. or information about disclosures where POPIA provides that right.

Complain. to Minitzers Inc. or to the Information Regulator if you believe your information has been processed unlawfully.

To exercise a right, contact our Information Officer and provide enough information to identify yourself, the relevant records and the request. We may request proof of identity and authority. We will respond within the periods and in the manner required by law. Some rights are limited by privilege, confidentiality, statutory retention, another person's rights, legal proceedings or other lawful grounds.

18. Complaints and contact details

Please first give us an opportunity to address your concern. Contact:

Addressee	The Information Officer, Minitzers Inc.
Email	property@minitzers.co.za
Telephone	021 871 1224

You may also lodge a POPIA complaint through the Information Regulator’s eServices portal or by using the prescribed complaint process:

Regulator	Information Regulator (South Africa)
Address	Woodmead North Office Park, 54 Maxwell Drive, Woodmead, Johannesburg, 2191
POPIA complaints	POPIAComplaints@inforegulator.org.za
General enquiries	enquiries@inforegulator.org.za 010 023 5200 0800 017 160
Website	https://inforegulator.org.za

19. Changes to this notice

We may update this notice to reflect changes in law, guidance, technology, services or our practices. The current version will state its effective date. Material changes will be communicated through an appropriate channel, which may include publication on our website.

20. Interpretation

Terms such as “personal information”, “processing”, “responsible party”, “operator”, “data subject” and “special personal information” have the meanings given to them in POPIA. “We”, “us” and “our” refer to Minitzers Inc. References to legislation include amendments and replacement legislation. Examples in this notice are illustrative and not exhaustive.