



**PRIVACY POLICY IN TERMS OF THE PROTECTION OF PERSONAL
INFORMATION ACT, 4 OF 2013**

OF

NN THOVHAKALE ATTORNEYS

REGISTRATION NUMBER 2020/737658/21

("NNT INC.")

**DATE OF COMPILATION: 01/04/2026
DATE OF REVISION: 01/03/2027**

1. INTRODUCTION

1.1. **NN Thovhakale Attorneys Incorporated** (“NNT INC”, “we”, “us”, “our”) is a modern, client and risk focused law firm that takes pride in its level of integrity, efficiency, and legal excellence. The firm is based at Brooklyn Bridge Office Park, Steven House, 3rd Floor, Brooklyn, Pretoria, 0181.

1.2. We are committed to protecting and respecting your privacy at all times and we strive to ensure that our use of your Personal Information is firstly lawful, rational, and significant to our business activities. Your provision of information to us is voluntary, although if you do not provide certain information to us, you may not be able to engage effectively with us or our services. By submitting your personal information to us, you agree and consent to our processing and transfer of your information in accordance with the law and with this Policy. We will take all steps reasonably necessary to ensure that your information is treated securely with sensitivity.

1.3. The firm has appointed **Mr Ndangi Thovhakale** as the Information Officer responsible for overseeing enquiries in relation to the Privacy Policy. You may contact our Information Officer at **info@nntinc.co.za** to discuss this Privacy Policy or your rights under the provision of the data protection legislation.

1.4. This Privacy Policy explains how we collect, use, store, disclose and protect personal information in accordance with the **Protection of Personal Information Act, 4 of 2013 (“POPIA”)**.

1.5. This Privacy Policy must be read together with any other documents, agreements and the terms of business which may be entered into between yourself and our firm, which describe the way we collect or process your Personal Information, as well our PAIA Manual.

2. OUR ROLE UNDER POPIA

2.1. For POPIA purposes, NNT INC is generally the responsible party when it determines the purpose of and means for processing personal information.

Where we process information on behalf of another party, we do so only in line with lawful instructions and applicable agreements.

3. WHY WE COLLECT YOUR INFORMATION

3.1. Protecting your information is important to us and we would like to explain why we collect, store and use your information and assure you that we will keep your information confidential. We will only share your Personal Information when legally required to do so. Your information may be used in order to fulfil our agreement with you where you have provided your consent, and this protects your or our legitimate interests.

4. HOW WE COLLECT YOUR INFORMATION

4.1. We may collect personal information directly from data subjects, from our website, social media platforms, online assessments, surveys, referees, regulators, government authorities, registries and other third parties. The categories described include clients and prospective clients, employees, volunteers, temporary staff, family members, service providers, foreign persons entities and others.

4.2. As you actively interact with us, you will likely provide information directly to us. We may also collect information through automated or passive interactions with you. Information may be obtained when you request information or our legal services from us. Through use of our systems as a supplier or vendor, our website at www.nntinc.com, interaction with our social media platforms, application for employment with us, completion of online assessments or surveys or contacting us via mail, telephone, email, electronic forms and otherwise may allow us access to your information.

5. INFORMATION WE MAY COLLECT

We may collect the following information about you:

5.1. Your name, email address, a home, work, postal or other physical address, other contact information, marital status, trading name, registration number, ID number, VAT number, business details, bank details, education, qualifications, employment history, references and other information you provide to us;

5.2. certain special personal information such as gender and race which you provide to us when applying for employment with us;

5.4. details relating to the legal services you have requested from us, and any orders and transactions with us, including any personal information, financial information and any other information regarding the matter which we require in the representation and/or assistance of our clients;

5.5. information contained in correspondence between us;

5.6. information that you provide when filling in forms on the Website or when responding to surveys and assessments;

5.7. details of your visits to our website (including but not limited to traffic data, IP address, location data, browser type, “visitor action pixels” from Facebook and other third-party tracking technologies, information collected via cookies and server logs); and

5.8. your image may be captured on CCTV cameras if you attend at our business premises.

6. WHERE WE STORE YOUR INFORMATION

6.1. The information that we collect from you is stored in locked physical storage, on our secure servers or, in the case of supplier and vendor bank details, on our third-party banking platform.

6.2. We have reasonable and appropriate security measures in place to protect the information we hold and to prevent unlawful processing, unauthorised access and accidental loss, destruction or damage. The Website uses a secure socket layer (SSL) for authentication and private communications.

6.3. Unfortunately, the transmission of information via the internet or email is not completely secure. Although we will do our best to protect your information, we cannot guarantee the security of your information transmitted via the website or email. Please note that any such transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

6.4. We retain your information for as long as needed or permitted considering the purposes for which it was obtained. The criteria used to determine our retention

periods includes but are not limited to the length of time we have an ongoing relationship with you and our legal obligations and legitimate business interests.

7. HOW WE USE YOUR INFORMATION

7.1. to provide you with services requested and improve our services to you if you are a client;

7.2. to purchase goods and services from you if you are a supplier;

7.3. to consider any application you make to us for employment;

7.4. to comply with applicable laws and regulations;

7.5. to respond to your queries, manage our relationship with you, and inform you about our services;

7.6. to communicate with persons for our internal purposes;

7.7. to enable our internal operations;

7.8. to exercise and defend legal rights;

7.9. to ensure that content on the website is presented in the most effective manner for you and for your online devices and to efficiently administer and improve the website;

7.10. to measure the effectiveness of our advertising for statistical and market research purposes;

7.11. to conduct research, although participation in surveys is voluntary;

7.12. to notify you about changes to our services or to verify the accuracy of the information we hold about you; and

7.13. to send you the information you might be interested in our various newsletters, which may relate to the marketing and promotion of our services, to which you can subscribe. You can unsubscribe from our newsletters at any time and thereafter we will not send them to you.

7.14. Also note that we receive and store standard information from you of a non-identifiable nature, which is information that is received when you interact with the site regarding your internet connection and online services. We may use such information to track movements on the site and improve the site and online services. Such information will include the URL you came from, IP address, domain type, browser type, country your device is located in, and any search terms you entered on our website. This information will not identify you unless combined with Personal Information and we do not use Personal Information in this process. Furthermore, we do not knowingly collect Personal Information of children without the consent of a parent or guardian.

8. DISCLOSURE / TRANSFER OF YOUR INFORMATION

8.1. We do not disclose personal information more widely than is reasonably necessary. Generally, we do not disclose your information to third parties, however, it may be necessary from time to time to make your information available to third parties such as legal and regulatory authorities, advocates, courts, accountants, auditors, professional advisers, sub-contractors or providers of products and services.

8.2. We may disclose your information to the extent necessary to enforce our Letter of Engagement or any agreement with you, to provide services to our clients, to comply with a legal obligation or to protect the rights, property, or safety as well as of others. This includes exchanging information with other companies and organisations for the purposes of fraud protection, crime prevention and credit risk reduction.

8.3. We use Google Analytics to collect traffic statistics for the website, and this information is shared with Google. You can opt out of Google Analytics by installing the Google Analytics opt-out browser add-on. For more information, please visit the Google Privacy Terms.

8.4. Where personal information may be transferred outside South Africa, we will do so only where POPIA permits it and where an adequate level of protection is in place or another lawful basis applies. We will assess all requirements before any transfers may occur and apply appropriate contractual or technical safeguards.

9. SECURITY / HOW DO WE PROTECT YOUR PERSONAL INFORMATION?

9.1. POPIA and other legislations places an obligation on us to take reasonable steps in ensuring that we provide adequate protection for the personal information we hold and to prevent unauthorized access and use of personal information contained by us.

9.2. Therefore, we take all reasonable and appropriate measures to ensure that your Personal Information is safeguarded and secure. We have reasonable standards of technology and operational security in place to attempt to prevent loss or misuse of any Personal Information. These measures include access controls, physical and logical security, virus protection, firewalls, backups and oversight of service providers.

9.3. Each time we commission other organisations to provide support services to us, we bind them to our privacy policies as far as they may be required to have access to our client's personal information to perform such services. Furthermore, our website may contain links to or from other sites and while we try to link only to sites that share our high standards, integrity and respect for privacy, we are not responsible for the content or the security or privacy practices employed by other sites. We highly recommend that you always read the privacy and security statements on those sites.

9.4. All our authorised employees who are responsible for the maintenance of any Special Personal Information as defined by the Protection of Personal Information Act No. 4 of 2013, submitted by you are requested to maintain the confidentiality of such information unless you have expressed to us otherwise.

9.5. We review our internal security controls for information collection, storage and processing practices, including physical security measures periodically, on an ongoing basis, to ensure that the personal information kept on our records. remains If a security compromise occurs, we will take appropriate remedial steps and notify affected parties as required by POPIA.

10. YOUR RIGHTS

10.1. The legislation of data protection may confer certain rights on you in respect of your Personal Information. It is important that our clients understand their rights in relation to the Personal Information we collect so that you make meaningful choices about what Personal Information you choose to make available to us.

10.2. You have the following rights in relation to the information we hold about you:

- i. the right to access information held about you ((commonly known as a "data subject access request")
- ii. the right to request the correction of your information; we strive to maintain accurate information so if it is determined that your information is not accurate, we will work quickly to correct it;
- iii. the right to opt-out of marketing communications;
- iv. the right to request the deletion of your information, in which case we will use reasonable efforts to delete your information.
- v. the right to object to the processing of your Personal Information for a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms.
- vi. the right to request restriction of processing of your Personal Information. You may ask us to suspend the processing of your Personal Information in limited circumstances, which may differ by jurisdiction.
- vii. The right to withdraw consent which you previously gave to the processing of your Personal Information at any time, however, withdrawal of consent may limit our ability to provide certain products and services to you or the ability of a third party to provide certain products or services to you but will not affect the continued processing of your Personal Information in instances in which your consent is not required.

11. PERSONAL INFORMATION OF MINOR CHILDREN.

11.1. We may, in certain limited circumstances, process Personal Information of children, including when providing services to you. In these situations, we process children's Personal Information either with the consent of a competent person or to fulfil a legal obligation.

11.2. We will not knowingly collect Personal Information from individuals in this age group unless we have obtained express consent to do so or there is a legal obligation requiring us to do so.

11.3. If you have any questions regarding the processing of Personal Information of children, please contact the Information Officer at info@ntinc.co.za.

12. MARKETING: MAIL, EMAIL, OR SMS PROMOTIONS

12.1. Only in the event that you have agreed to this, we may use your personal or other information to send you information on new services that may be of interest to you and from time to time will mail, email or SMS information to you about us, our products and services, or our partners and their products or services. If you do not wish to continue receiving this information you may contact us and we will remove you from our mailing list.

13. CHANGES TO THIS POLICY

13.1. We may amend and update this Privacy Policy from time to time at our sole discretion, to the extent permitted by law, without providing notice. If we do make changes, we will post the revised policy on our website. As a result, please regularly review our Privacy Policy on our website. If you continue to interact with us, provide products or services to us, or use our products and services after amendments have been made to the Privacy Policy and published on this Website, you will be considered to have accepted the updated Privacy Policy.

14. CONTACT DETAILS OF AUTHORITIES

14.1. For the purpose of the Protection of Personal Information Act (4 of 2013), the responsible person is Mr. Ndangi Thovhakale. Please contact our Information Officer at **info@nntinc.co.za** if you have questions regarding this Policy or our privacy practices, if you would like to review, correct, update or delete the information we hold about you. If you would like to object to or withdraw your consent to our use of your information or if you would like to opt-out of marketing communications.

14.2. If you wish to report a complaint regarding your Personal Information that we hold, if you are unhappy that we have not addressed your concerns satisfactorily, you can contact the Information Regulator at: **info@nntinc.co.za**.