

CONTROLLED POLICY**PRIVACY AND POPIA NOTICE****MW-PRIV-001 | MEDIATE WORKS PROMOTING PEACE (PTY) LTD**

Document ID	MW-PRIV-001
Version	1.0
Status	Draft for formal adoption
Classification	Public
Policy owner	Ebrahim Patelia — Chief Executive
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Legal/professional review date	5 August 2026
Effective date	5 August 2026
Review cycle	At least annually and on material legal, regulatory, service or technology change

1. PURPOSE AND SCOPE

- 1.1. Mediate Works (referred to as 'MW') respects privacy and recognises that dispute resolution, workplace interventions, professional training and advisory work can involve information of unusual sensitivity. This Privacy Notice explains how MW collects, uses, stores, shares and protects personal information and how data subjects may exercise their rights.
- 1.2. It applies to information processed through mediateworks.com, contact and quote forms, newsletters, online booking systems, Med-AI, email and telephone communications, virtual meeting services, training platforms, payment and accounting systems, in-person activities and professional engagements. A case-specific mediation agreement, engagement letter, employer/client instruction or statutory rule may impose additional confidentiality and data-handling obligations. Where those are more protective, MW will apply the more protective obligation to the extent required.

2. RESPONSIBLE PARTY AND INFORMATION OFFICER

- 2.1. Responsible party: Mediate Works (Pty) Ltd. Company registration number: 2015/160919/07 Registered/physical address: 24, 1ST Avenue Houghton Estate Johannesburg 2198; Website: <https://www.mediateworks.com/>; Primary compliance contact: Ebrahim Patelia, Chief Executive, ebrahim@mediateworks.com; General email: info@mediateworks.com; Telephone: +27 87 150 5283. Information Officer: Ebrahim Patelia, as MW's Chief Executive/head of the private body for POPIA/PAIA purposes, Privacy/PAIA email: ebrahim@mediateworks.com

3. OUR PRIVACY PRINCIPLES

- 3.1. MW will process personal information lawfully and reasonably; collect only information relevant to an identified purpose; use it for compatible purposes; take reasonable steps to maintain quality; be transparent about processing;

protect information with appropriate technical and organisational safeguards; respect access, correction and objection rights; and retain identifiable information only for as long as authorised or reasonably necessary.

- 3.2. Confidentiality in mediation is broader than data protection alone. Information may be confidential even when it is not “personal information” under POPIA. MW personnel and practitioners must therefore apply both privacy law and the professional confidentiality rules in MW-CODE-010 and the relevant engagement agreement.

4. CATEGORIES OF PERSONAL INFORMATION

- 4.1. Depending on the interaction, MW may process:

- 4.1.1. identity and contact information, such as names, titles, telephone numbers, email and postal addresses;
- 4.1.2. organisation, employer, professional role, job title and business contact information;
- 4.1.3. enquiry, quote, booking and appointment details;
- 4.1.4. business information, registration details, vat registration and other compliance related information;
- 4.1.5. information needed to assess a proposed engagement, including the identity of parties, representatives and related organisations for conflict checks;
- 4.1.6. dispute, employment, commercial, family, civil, community, medico-legal or other case information supplied in connection with a professional service;
- 4.1.7. special personal information where lawfully required, which may include health, race or ethnic origin, trade-union membership, political persuasion, religious or philosophical belief, or alleged criminal conduct;
- 4.1.8. information relating to children where a matter lawfully requires it and appropriate authorisation exists;
- 4.1.9. contracts, invoices, payment status, transaction references and accounting information. MW should avoid storing full payment-card credentials and should use an appropriately secure payment provider;
- 4.1.10. communications and correspondence with MW, including complaints and privacy/PAIA requests;
- 4.1.11. training registration, attendance, learning needs, accessibility requirements, assessment results, certificates, feedback and evaluation information;
- 4.1.12. practitioner, trainer, supplier and associate information, including qualifications, accreditation, experience, conflicts, tax/payment information and contractual records;
- 4.1.13. website and device information such as IP address, device/browser information, cookie identifiers, page activity, approximate location and security logs where collected by Wix or configured third-party tools;
- 4.1.14. marketing preferences and the source/date/method of consent or objection;
- 4.1.15. photographs, video or audio only where there is an appropriate lawful basis and, for professional sessions, an express recording protocol; and
- 4.1.16. Med-AI prompts, interaction metadata and outputs to the extent actually retained by MW or its approved operators. Users should not submit confidential mediation communications, privileged material or unnecessary special personal information to Med-AI.

5. SOURCES OF INFORMATION

- 5.1. MW generally collects information directly from the data subject. It may also receive information from a client organisation, another party to a dispute, a legal or employee representative, an employer, a court or tribunal, a referring institution, a co-mediator or appointed practitioner, a publicly available professional source, or an approved service

provider. Where information is obtained indirectly, MW will comply with POPIA section 18 to the extent applicable, including notification unless a lawful exception applies.

- 5.2. No person should send MW more third-party information than is reasonably necessary. A party providing personal information about another person is responsible for having an appropriate basis to disclose it and for complying with any notice obligation that rests on that party.

6. PURPOSES OF PROCESSING

- 6.1. MW may process personal information to:

- 6.1.1. respond to enquiries and provide requested information;
- 6.1.2. conduct conflict and suitability checks before accepting professional appointments;
- 6.1.3. prepare proposals, quotes, bookings and engagement documentation;
- 6.1.4. appoint and administer mediators, arbitrators, facilitators, independent chairpersons, trainers, experts or other third-party professionals;
- 6.1.5. deliver mediation, facilitation, training, advisory and related services;
- 6.1.6. manage communications, virtual meetings, documents, attendance and logistics;
- 6.1.7. administer accounts, payments, refunds, tax and financial records;
- 6.1.8. maintain professional quality, evaluate training and address service complaints;
- 6.1.9. comply with legal, regulatory, court, contractual and professional obligations;
- 6.1.10. establish, exercise or defend legal claims;
- 6.1.11. protect the security and integrity of MW's systems, users and services;
- 6.1.12. maintain business continuity, backups and audit trails;
- 6.1.13. improve website functionality and understand website use through configured analytics;
- 6.1.14. operate Med-AI as an informational service subject to MW-AI-005;
- 6.1.15. send direct marketing only in accordance with POPIA, the CPA, the 2026 Opt-Out Registry requirements and MW-MKT-007; and
- 6.1.16. produce de-identified statistics, service-quality reporting and research where individuals are not identifiable.

7. LAWFUL JUSTIFICATION

- 7.1. POPIA does not make consent the only basis for ordinary personal-information processing. MW will identify and document an appropriate justification under section 11 for each material activity. Depending on the facts, processing may be based on the data subject's consent; performance of a contract or steps requested before a contract; compliance with a legal obligation; protection of a legitimate interest of the data subject; performance of a public-law duty where applicable; or legitimate interests pursued by MW or a third party, balanced against the data subject's rights.
- 7.2. Where consent is relied on, it must be voluntary, specific and informed and capable of proof. Consent may be withdrawn, but withdrawal does not retrospectively invalidate lawful processing that occurred before withdrawal or prevent processing justified on another lawful ground.

8. SPECIAL PERSONAL INFORMATION AND CHILDREN

- 8.1. MW will not treat ordinary consent wording on a website form as blanket authority to process all special personal information. Where special personal information is necessary for a dispute, training accommodation, employment matter or other service, MW will identify an authorisation permitted by POPIA sections 26–33 and apply additional safeguards.
- 8.2. MW's general website and Med-AI are not designed to solicit personal information directly from children. If a professional matter requires information about a child, MW will process it only where authorised under POPIA section 35 or other applicable law and will use proportionate safeguards. Practitioners must take particular care not to upload children's information to general-purpose AI tools.

9. PROFESSIONAL CONFIDENTIALITY AND CASE INFORMATION

- 9.1. Information supplied for a conflict check should initially be limited to the identities of relevant persons/entities, the broad nature of the matter and what is reasonably needed to establish suitability. Detailed merits documents should ordinarily be provided only after the appointment process and secure communication method are confirmed.
- 9.2. Mediation communications are handled in accordance with the applicable mediation agreement, law, court rule or directive and MW-CODE-010. Private-session information will not be disclosed to another party without permission from the communicating party, except where disclosure is required by law or a clearly stated exception applies.
- 9.3. MW does not promise that ordinary website forms, ordinary email or Med-AI are suitable channels for highly confidential case documents. Secure channels designated for the engagement should be used.

10. SHARING AND RECIPIENTS

- 10.1. MW will not sell personal information. It may disclose information, on a need-to-know basis and subject to appropriate safeguards, to:
 - 10.1.1. the practitioner, trainer, associate or expert appointed for the requested service;
 - 10.1.2. parties and authorised representatives where disclosure is part of the agreed process;
 - 10.1.3. contracted administrative, IT, website, cloud, email, booking, virtual-meeting, payment, accounting, security, document-signing or professional service providers acting as operators or independent responsible parties as applicable;
 - 10.1.4. auditors, insurers and professional advisers where legitimately necessary;
 - 10.1.5. courts, regulators, law-enforcement bodies or other authorities where disclosure is legally required or properly authorised; and
 - 10.1.6. a successor or restructuring counterparty where a legitimate corporate transaction occurs, subject to confidentiality and POPIA safeguards.
- 10.2. Operators processing personal information for MW must be appropriately assessed and, where POPIA section 21 applies, bound by a written agreement requiring appropriate security measures and prompt notification of unauthorised access/acquisition.

11. INTERNATIONAL TRANSFERS

12. Some cloud; website, video, email, booking, payment or AI service providers may process data outside South Africa. MW will identify material international transfers and use a mechanism permitted by POPIA section 72, such as adequate protection under applicable law or a binding agreement, valid consent where appropriate, or a transfer necessary for a contract or other statutory ground.

13. MW users third party software and cloud storage as disclosed below

Wix & Wix AI	United States, Ireland, Israel, Taiwan, South Korea	Website hosting, analytics, AI content generation, contact form submissions.
Cal.com (Cal.co)	United States, European Union (EU)	Appointment scheduling, calendar sync data, usernames, and emails.
Microsoft & Teams	South Africa (Local Core Data), United States, European Union	Business emails, chats, video call data, file sharing, and internal documents.
Google (Workspace & Gemini)	United States, European Union	Cloud storage, document collaboration, emails, and AI prompt interactions.
Zoom	United States, European Union, Israel	Video conferencing metadata, cloud recordings, and meeting participant logs.
QuickBooks (Intuit)	United States (AWS Cloud Infrastructure)	Accounting data, financial invoices, business expenses, and client billing info.

14. SECURITY

- 14.1. MW will maintain measures appropriate to the sensitivity and volume of information and reasonably foreseeable risks. Controls should include, as applicable, role-based access, least privilege, multi-factor authentication, secure configuration, encryption in transit and where appropriate at rest, protected backups, device security, malware protection, patching, access review, secure disposal, staff/practitioner confidentiality duties, operator due diligence, incident response and periodic risk assessment.
- 14.2. No internet service can be guaranteed completely secure. Users should not send passwords, full payment-card details or unnecessary confidential documents through general website forms or Med-AI.

15. SECURITY COMPROMISES

- 15.1. MW maintains an incident-response process. Where there are reasonable grounds to believe that a data subject's personal information has been accessed or acquired by an unauthorised person, MW will investigate, contain and document the incident and, when MW is the responsible party, notify the Information Regulator and affected data subject as soon as reasonably possible in accordance with POPIA section 22, subject to lawful delay. Operators must notify MW promptly in accordance with their written agreements.

16. RETENTION AND DELETION

17. MW retains records only while authorised or reasonably necessary for the purpose for which they were collected, an applicable contract, professional obligation, lawful evidential need, statutory record-keeping duty or legal hold. Retention periods differ by record type. MW-GOV-012 Records Retention Schedule contains MW's proposed schedule. At the end of the authorised period, records should be securely destroyed, deleted or de-identified so that they cannot reasonably be reconstructed in an intelligible form, subject to technically necessary backup cycles.

18. DATA-SUBJECT RIGHTS

- 18.1. Subject to POPIA, PAIA and lawful limitations, a data subject may ask MW to confirm whether it holds their personal information; request access; request correction or deletion of information that is inaccurate, irrelevant, excessive, out

of date, incomplete, misleading or unlawfully obtained; request destruction/deletion where MW is no longer authorised to retain the record; object to processing on grounds permitted by POPIA; object to direct marketing; withdraw consent where consent is the basis; and complain to the Information Regulator.

- 18.2. MW may need reasonable proof of identity and may refuse or limit access where PAIA grounds for refusal apply, including where disclosure would improperly reveal another person's information or privileged/confidential material.
- 18.3. Requests should be sent to the designated privacy/PAIA contact above. MW will respond as soon as reasonably practicable and within any statutory period that applies.

19. DIRECT MARKETING

- 19.1. MW will comply with MW-MKT-007. Unsolicited electronic direct marketing to a non-customer requires compliant prior consent under POPIA section 69, subject to the limited one-time approach permitted to request consent where it has not previously been withheld. Marketing to an existing customer is limited to MW's own similar services and requires the statutory opportunity to object. Each marketing communication must identify the sender and provide a simple, free mechanism to stop future marketing.
- 19.2. MW must additionally comply with the CPA's national Opt-Out Registry regime and the 2026 amended regulations when applicable, including registration/screening requirements for direct marketers. An unsubscribe request or objection must be honoured across relevant marketing systems.

20. COOKIES, ANALYTICS AND EMBEDDED CONTENT

- 20.1. The website uses Wix functionality and may use cookies, analytics and embedded third-party content. MW-COOKIE-004 explains the categories and choices. Non-essential tracking should be controlled through an appropriate preference mechanism, and the actual cookie inventory must be kept current.

21. MED-AI

- 21.1. Med-AI is subject to MW-AI-005. It is an informational tool, not a confidential mediation channel and not a substitute for a lawyer, mediator, medical practitioner, accountant or other appropriately qualified human professional. MW will not use a solely automated Med-AI decision to determine a person's legal rights, mediator suitability, case outcome or access to a professional service where POPIA section 71 would prohibit or restrict that decision. Material professional decisions require appropriate human oversight.

22. INFORMATION REGULATOR

- 22.1. The Information Regulator's current public contact details should be checked at publication and review. As at the date of this pack, its eServices site lists: Woodmead North Office Park, 54 Maxwell Drive, Woodmead, Johannesburg; PO Box 31533, Braamfontein, Johannesburg, 2017; telephone 010 023 5200; enquiries@info regulator.org.za. POPIA complaints may be lodged through the Regulator's complaint process, including POPIAComplaints@info regulator.org.za as presently published.

23. CHANGES TO THIS NOTICE

- 23.1. MW may update this Notice when law, services or technology changes. The effective date will be displayed. A material change affecting an existing purpose or consent will be communicated or fresh consent obtained where required.
- 23.2. Effective date: 5 August 2026.

24. RELATED MW CONTROLLED DOCUMENTS

- 24.1. MW-CODE-010 — Professional Code of Conduct
- 24.2. MW-GOV-012 — POPIA, Information Security and Records Governance Framework
- 24.3. MW-MKT-007 — Direct Marketing and Newsletter Policy
- 24.4. MW-AI-005 — Med-AI Terms, Data Notice and Responsible AI Policy
- 24.5. MW-COOKIE-004 — Cookie and Tracking Policy

25. VERIFIED AUTHORITIES AND REVIEW BASIS

- 25.1. Legal/professional source check completed 5 August 2026. Primary legislation, regulator/court materials and IMI's own standards were prioritised. The SALRC mediation paper is treated as reform material, not enacted law; IMI draft-code consultation material is treated as non-binding.
- 25.2. [Protection of Personal Information Act 4 of 2013](#)
- 25.3. [Information Regulator — POPIA/PAIA and Information Officer guidance](#)
- 25.4. [Information Regulator — Guidance Note on Direct Marketing under POPIA](#)

DOCUMENT CONTROL AND APPROVAL

Approved by	EBRAHIM PATELIA
Capacity	CEO
Signature	EP
Adoption / effective date	5 AUGUST 2026
Next review	4 AUGUST 2026

