



PRIVACY POLICY

## MINT PRIVACY POLICY

Internal/External	External (Public)
Policy Owner	Legal, Risk and Compliance/Information Officer
Approved By	EXCO
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### 1. INTRODUCTION

1.1. MINT Proprietary Limited (“**MINT**”, “**we**”, “**us**”, “**our**”), including its Financial Services Provider division (FSP No. 55118), is a technology company specialising in enterprise software, AI-enabled solutions, automation, data-driven platforms, digital transformation tools and related professional services.

1.2. In the ordinary course of delivering these solutions and services, MINT Processes Personal Information and is committed to doing so lawfully, transparently and securely in compliance with the Protection of Personal Information Act 4 of 2013 (“**POPIA**”).

1.3. This Privacy Policy (“**Policy**”) explains how MINT collects, uses, stores, discloses, transfers and protects Personal Information in connection with:

- 1.3.1. our websites, including [www.theMINT.com](http://www.theMINT.com);
- 1.3.2. our software platforms, workspaces, applications, portals, APIs and integrated technology systems; and
- 1.3.3. our regulated and non-regulated business operations.

1.4. This Policy applies to all Data Subjects with whom we interact, including users of our technology platforms, representatives of corporate customers, prospective clients, suppliers, partners, service providers and visitors to our Website.

Page 11.5. By engaging with MINT, whether through our Website, platforms, communications, products, professional services or regulated financial services, you acknowledge and accept the terms of this Policy.

### 2. APPLICATION OF THIS POLICY

2.1. MINT, in its capacity as a Responsible Party, strives to comply with POPIA and accepted information protection principles in all Processing of Personal Information.

2.2. This Policy applies to all Personal Information collected by MINT in connection with:

- 2.2.1. provision of MINT’s digital and data-driven solutions;
- 2.2.2. onboarding processes, including those required under FICA and FAIS (for FSP activities);
- 2.2.3. website and platform interactions;
- 2.2.4. support, sales and business engagements;
- 2.2.5. contractual relationships; and
- 2.2.6. internal business operations.

2.3. This Policy does not apply to information collected by independent third-party websites, platforms or applications that are not owned or controlled by MINT.

### 3. DEFINITIONS

3.1. Terms used in this Policy are defined in Annexure A.

3.2. Where a term is defined in POPIA, that definition shall prevail.

#### Page 24. **CATEGORIES OF PERSONAL INFORMATION WE COLLECT**

MINT may collect and Process the following categories of Personal Information:

#### 4.1. **Contact & Identification Information**

- 4.1.1. full name;
- 4.1.2. email address, physical or postal address, phone number;
- 4.1.3. company name, job title or role;
- 4.1.4. account credentials for MINT platforms.

#### 4.2. **Regulatory & Compliance Information**

- 4.2.1. Information required for KYC/FICA, including identity documentation where legally required, proof of address, declarations, and suitability information.
- 4.2.2. MINT does not collect these items through the public Website. They are collected only through secure workflows or direct regulated engagements.

#### 4.3. **Technical & Usage Data**

- 4.3.1. IP address, device identifiers, browser type, system logs;
- 4.3.2. Telemetry, diagnostics, platform usage logs, authentication logs;
- 4.3.3. Geolocation metadata; and
- 4.3.4. Cookie and analytics data.

#### Page 34.4. **Business & Transactional Information**

- 4.4.1. Information relating to services requested or used;
- 4.4.2. Emails, correspondence, demo requests, support tickets;
- 4.4.3. Commercial documentation, statements of work, contracts.

#### 4.5. **Voluntary Information**

Information submitted through questionnaires, surveys, feedback or forms.

#### 4.6. **Special Personal Information**

MINT does not intentionally collect Special Personal Information except where required for compliance with law (e.g., FICA) and only through secure and non-public channels.

## 5. HOW WE COLLECT PERSONAL INFORMATION

MINT collects Personal Information:

5.1. Directly from you, such as when creating accounts, communicating with us, entering into agreements, requesting services, submitting documentation, or using our platforms.

5.2. Automatically, through Cookies, tracking technologies, telemetry tools and analytics when you interact with our Website, software or digital platforms.

5.3. From third parties, such as verification service providers, regulators, analytics providers, credit bureaus, or publicly accessible databases (where lawful).

5.4. Through regulated onboarding processes, including obligations applicable to MINT's FSP division.

## SPECIAL PERSONAL INFORMATION AND PERSONAL INFORMATION OF CHILDREN

6.1. MINT Processes Special Personal Information only:

6.1.1. where required by law (e.g., FICA obligations);

6.1.2. where necessary for the establishment or defence of legal rights; or

6.1.3. where explicit consent is provided (as appropriate).

6.2. MINT's Website and services are not intended for children, and we do not knowingly collect Personal Information relating to individuals under 18, except in exceptional regulated circumstances and with the consent of a competent person.

## 7. PURPOSES FOR PROCESSING PERSONAL INFORMATION

MINT Processes Personal Information for the following lawful purposes:

### 7.1. Provision of Products and Services

To deliver, maintain, secure and support MINT's platforms, applications, tools and professional services.

### 7.2. Client and Platform Management

To administer accounts, facilitate access authentication, maintain platform operability and enable user functionality.

### 7.3. Regulatory and Legal Compliance

To comply with POPIA, FICA, FAIS, financial services regulations, reporting requirements and lawful requests by regulators or authorities.

### Page 57.4. Analytics, Development and Improvement

To analyse system performance, conduct diagnostics, improve product functionality and enhance user experience.

### **7.5. Operations and Management**

For governance, audits, risk management, billing, internal controls, IT administration, quality assurance and business reporting.

### **7.6. Security and Fraud Prevention**

To protect MINT systems, detect unauthorised access, monitor cybersecurity threats and maintain the integrity of MINT's platforms.

### **7.7. Marketing and Communications**

To communicate with clients and prospective customers, where permitted, regarding MINT's services, updates and events.

MINT does **not** sell, rent or trade Personal Information.

## **8. LEGAL BASES FOR PROCESSING**

MINT Processes Personal Information only where legally permissible, including:

8.1. Consent, where explicit consent has been provided.

8.2. Performance of a contract or taking steps prior to entering into a contract.

8.3. Compliance with legal obligations, including obligations related to MINT's FSP licence.

8.4. Legitimate interests, including enhancing security, improving services, preventing fraud, ensuring platform functionality or operating the business efficiently.

Page 69. 10. 8.5. Public interest functions, where applicable to financial sector regulation.

## **DISCLOSURE OF PERSONAL INFORMATION TO THIRD PARTIES**

9.1. MINT may disclose Personal Information to:

### **9.1.1. Service Providers and Operators**

Including cloud providers, hosting vendors, analytics providers, communication tools, cybersecurity vendors, verification partners and IT support services.

### **9.1.2. Regulators and Authorities**

Where required by law, including the Information Regulator, FSCA, FIC, SARS or pursuant to a lawful order.

### **9.1.3. Professional Advisers**

Including auditors, legal advisers, compliance consultants and insurers.

### **9.1.4. Corporate Transactions**

In the context of mergers, acquisitions, restructuring or business transfers, subject to confidentiality obligations.

9.2. MINT requires all third parties to maintain appropriate confidentiality and security safeguards.

## **CROSS-BORDER TRANSFER OF PERSONAL INFORMATION**

10.1. MINT may transfer Personal Information to jurisdictions outside South Africa, including cloud infrastructure providers.

10.2. Such transfers will occur only where:

Page 710.2.1. the receiving jurisdiction provides an adequate level of protection; or

10.2.2. MINT has implemented appropriate contractual safeguards aligned with POPIA.

10.3. MINT ensures that Operators processing Personal Information internationally do so in accordance with binding agreements.

## **11. DATA SECURITY**

11.1. MINT implements appropriate, reasonable technical and organisational measures to safeguard Personal Information, including:

- 11.1.1. encryption of data in transit and at rest (where applicable);
- 11.1.2. multi-factor authentication for privileged access;
- 11.1.3. continuous monitoring and logging;
- 11.1.4. network and infrastructure security controls;
- 11.1.5. secure development practices;
- 11.1.6. regular testing and vulnerability scanning; and
- 11.1.7. strict role-based access controls.

11.2. Where MINT reasonably believes that Personal Information has been accessed or acquired by an unauthorised person, MINT will notify affected Data Subjects and the Information Regulator in accordance with POPIA.

## **12. DATA ACCURACY**

MINT takes reasonable steps to ensure Personal Information is complete, accurate, not misleading, and up to date. Data Subjects are encouraged to notify MINT of any changes.

## **DATA RETENTION**

13.1. MINT retains Personal Information only for as long as necessary to:

- 13.1.1. achieve the purpose for which it was collected;
- 13.1.2. comply with legal or regulatory obligations;
- 13.1.3. fulfil contractual requirements; or
- 13.1.4. protect MINT's legitimate interests.

13.2. At the end of the retention period, Personal Information is securely deleted, destroyed or de-identified.

## **14. USE OF THE MINT WEBSITE AND PLATFORMS**

MINT may Process technical or aggregated data related to Website or platform usage. Our Website may contain links to third-party sites. MINT is not responsible for their privacy practices.

## **15. COOKIES AND SIMILAR TECHNOLOGIES**

15.1. MINT uses Cookies and similar technologies for:

- 15.1.1. functionality;
- 15.1.2. analytics;
- 15.1.3. security; and

15.1.4. performance monitoring.

15.2. You may disable Cookies through browser settings, although this may impact platform or Website functionality.

## **DIRECT MARKETING**

16.1. MINT may Process Personal Information for Direct Marketing in accordance with POPIA.

16.2. We will only send marketing communications where:

16.2.1. you have opted in; or

16.2.2. you are an existing client and communications relate to similar services.

16.3. You may unsubscribe at any time.

## **17. YOUR RIGHTS AS A DATA SUBJECT**

You may have the following rights:

17.1. access to your Personal Information;

17.2. correction or updating of inaccurate data;

17.3. deletion or restriction of Processing (subject to legal limitations);

17.4. objection to Processing or Direct Marketing;

17.5. withdrawal of consent (where Processing is based on consent);

17.6. lodging a complaint with the Information Regulator.

## **18. INFORMATION REGULATOR CONTACT DETAILS**

18.1. Website: <https://infoeregulator.org.za>

18.2. Email: [POPIAComplaints@infoeregulator.org.za](mailto:POPIAComplaints@infoeregulator.org.za)

Page 1019. **CONTACT DETAILS OF MINT'S INFORMATION OFFICER**

19.1. **Information Officer:**

19.2. **Email:** [compliance@theMINT.com](mailto:compliance@theMINT.com)

19.3. **Telephone:** +27 (10) 276-0531

19.4. **Address:** 3 Gwen Lane, Sandown, 2031

## **20. AMENDMENTS TO THIS POLICY**

20.1. MINT may update this Policy periodically.

20.2. The version published on our Website will be the most current version. Continued use of our services constitutes acceptance of the updated Policy.

## **ANNEXURE A: DEFINITIONS**

In this Policy, unless the context indicates otherwise, the following terms shall have the meanings assigned to them below.

Where a definition is provided for a term in POPIA, that definition shall take precedence.

1. **"MINT"** means MINT Proprietary Limited (including any subsidiaries or affiliates) and its Financial Services Provider division (FSP No. 55118), together with all directors, employees,

consultants, agents and authorised representatives acting on its behalf. References to “we”, “us” or “our” shall be interpreted accordingly;

2. **“Child”** means any natural person under the age of 18 years, as contemplated in POPIA;

3. **“Cookie”** means a small text file or similar data element placed on a device when visiting or interacting with the Website or MINT’s platforms, including analogous technologies such as pixels, tags, tracking tools, SDKs, beacons, telemetry identifiers or similar tools used to support analytics, functionality, security, diagnostics or user experience;

4. **“Data Subject”** means the natural or juristic person to whom Personal Information relates and whose Personal Information is Processed by MINT. This includes clients, prospective clients, platform users, Website visitors, suppliers, partners, service providers, and any individual interacting with MINT;

5. **“Information Officer”** means the individual appointed by MINT in terms of POPIA and any Deputy Information Officers authorised to perform the duties and responsibilities assigned to an information officer, including oversight of POPIA compliance, monitoring, requests, governance, reporting and incident management;

6. **“Information Regulator”** means the Information Regulator (South Africa) established in terms of POPIA, responsible for monitoring and enforcing compliance with South African data protection laws;

**“Operator”** means any third-party who Processes Personal Information for MINT (the Responsible Party) in terms of a contract or mandate, without coming under MINT’s direct authority. Operators may include MINT’s cloud hosting partners, security tools, analytics providers, software vendors, verification service providers, outsourced IT support, email or communication tools, and other technical or administrative service providers;

**“Personal Information”** means information relating to an identifiable, living natural person, and where applicable, an identifiable existing juristic person, including but not limited to:

8.1. name, contact details, identification numbers, email address, physical or postal address, phone number;

8.2. company name, professional role, job title and business affiliation;

8.3. online identifiers such as IP address, device identifiers, login credentials, analytics identifiers or geolocation;

8.4. platform interaction logs, usage data, authentication data or telemetry;

8.5. information submitted during onboarding, contracting or service delivery;

8.6. internal communications, correspondence, support requests or documentation;

8.7. any other information that identifies or could reasonably be linked to an identifiable Data Subject.

“**POPIA**” means the Protection of Personal Information Act 4 of 2013, including all regulations, directives, codes of conduct and guidance notes issued by the Information Regulator;

“**Process**”, “**Processing**” or “**Processed**” means any operation or activity, whether by automated or manual means, concerning Personal Information, including:

- 10.1. collection, receipt, recording, organisation or storage;
- 10.2. updating, modification, retrieval, consolidation or consultation;
- 10.3. dissemination, transmission, distribution or making available;
- 10.4. alignment, merging, adaptation, combination or linkage;
- 10.5. restriction, pseudonymisation, encryption, archival or retention; and
- 10.6. destruction, erasure or de-identification.

“**Responsible Party**” means the entity that determines the purpose of and means for Processing Personal Information. For purposes of this Policy, MINT is the Responsible Party;

“**Service Provider**” means any third-party engaged by MINT to support the operation of its business or provision of its products, including:

- 12.1. cloud hosting vendors, data centres, platform operators;
- 12.2. analytics, diagnostic and performance monitoring tools;
- 12.3. communications and email service providers;
- 12.4. cybersecurity vendors, monitoring tools and authentication systems;
- 12.5. regulated verification partners (e.g., FICA/KYC providers);
- 12.6. professional advisers (legal, audit, compliance, financial);
- 12.7. outsourced IT, support or technical services.

Where such parties Process Personal Information on MINT’s behalf, they are regarded as Operators under POPIA.

13. “**Special Personal Information**” means Personal Information relating to:

- 13.1. race or ethnic origin;
- 13.2. religious or philosophical beliefs;
- 13.3. political persuasion;
- 13.4. trade union membership;
- 13.5. health, biometric or genetic information;
- 13.6. criminal behaviour or alleged offences;
- 13.7. sexual life or sexual orientation;
- 13.8. any information designated as “special” under POPIA.

MINT does not process such information unless required by law (e.g., FICA compliance) or with explicit consent;

14. “**Website**” means any website or digital property owned or operated by MINT, including [www.theMINT.com](http://www.theMINT.com), subdomains, portals, web applications, integrated workspaces, linked APIs, dashboards or platform interfaces provided or maintained by MINT.

