

PRIVACY & POPIA POLICY

1. General & Purpose Belinda de Klerk trading as UNCOUPLED ("Uncoupled") is the responsible party under the Protection of Personal Information Act 4 of 2013 ("POPIA"). This policy outlines how Uncoupled collects, processes, secures, retains, and discloses Personal Information, Special Personal Information, and Children's Information across our website, initial enquiries, and mediation services in accordance with POPIA and the Promotion of Access to Information Act 2 of 2000 ("PAIA").

2. Lawful Grounds for Processing Uncoupled processes personal information lawfully, reasonably, and without unjustifiably infringing data subject privacy. Processing is conducted on specific lawful grounds, including:

- Data subject consent.
- Conclusion or performance of a mediation service agreement.
- Compliance with legal obligations (including court orders and tax reporting).
- Protection or pursuit of legitimate interests of data subjects, Uncoupled, or third parties.

3. Processing of Special Personal Information & Children's Data Due to the nature of family mediation, Uncoupled may process sensitive data:

- Special Personal Information: Processed only with explicit consent, where required by law to establish or defend legal rights, or where health details are necessary for mediation.
- Children's Personal Information: Information relating to minors is processed strictly with the consent of a parent or legal guardian, or where necessary to comply with legal requirements under the Children's Act 38 of 2005 or POPIA Section 35.

4. Disclosure & Cross-Border Data Transfers Information supplied for mediation may be shared with co-participants, authorized legal representatives, financial advisers, or technical operators supporting our services. Private caucus communications remain governed by the signed Agreement to Mediate. Where personal information is transferred outside South Africa (e.g., cloud storage or international processing), Uncoupled ensures compliance with POPIA Section 72, verifying that recipients are bound by laws or agreements providing substantially similar data protection levels.

5. Direct Marketing & Information Security Uncoupled complies strictly with Section 69 of POPIA regarding unsolicited direct marketing. Marketing communications include a clear, free opt-out mechanism. Uncoupled maintains reasonable operational and technical safeguards against unauthorized access, loss, or misuse of data. In the event of a security compromise, Uncoupled will notify the Information Regulator and affected data subjects as required by Section 22 of POPIA.

6. Data Subject Rights & PAIA Access Data subjects have the right to request access to, correction of, or deletion of their personal information. Formal access requests may be submitted in accordance with our PAIA Manual. You may also lodge complaints with the

Information Regulator of South Africa (POPIAComplaints@inforegulator.org.za / <https://inforegulator.org.za/>).

7. Responsible Party & Contact Information (ECTA & POPIA Section 51)

- Responsible Party / Information Officer: Belinda de Klerk trading as UNCOUPLED
- Email: belinda@uncoupled.co.za

8. Effective Date Effective Date: 20 August 2026