



PUBLIC COMPLIANCE DOCUMENT

PRIVACY NOTICE

Issued in accordance with the Protection of Personal Information Act 4 of 2013 (POPIA)

Luminera (Pty) Ltd

Registration number 2026/556387/07
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1. Purpose and scope

This Privacy Notice explains how Luminera (Pty) Ltd ("Luminera", "we", "us" or "our") collects, uses, shares, stores and protects personal information. It applies to website visitors, people who submit enquiries or request quotations, customers and their representatives, suppliers and manufacturers, logistics partners, professional advisers, regulators and other persons who interact with Luminera.

This Notice is intended to meet Luminera's transparency obligations under POPIA, including the notification requirements in section 18. It should be read with Luminera's PAIA Manual, Website Terms of Use, Quote Request Terms and Cookie and Analytics Notice once those documents are published.

Important scope boundary

Luminera supplies transparent display, smart film, switchable glass and specialist intelligent-glass technologies. Luminera does not provide surveys, engineering, installation, commissioning, maintenance, repair, training or on-site support unless an item is expressly agreed in writing under a separate arrangement.

2. Responsible party and contact details

Responsible party	Luminera (Pty) Ltd
Registration number	2026/556387/07
Trading name	Luminera
Country	South Africa
Website	https://lumineraafrica.com
General and privacy email	info@lumineraafrica.com
Telephone / WhatsApp	078 909 7747
Physical and postal address	61 Meerkat Street, Kathu, Northern Cape, 8446

3. Information Officer

Name	Michael Bester
Designation	Director, Operational Head and Information Officer
Privacy and POPIA requests	info@lumineraafrica.com
Telephone	078 909 7747
Deputy Information Officer	None designated at the date of this Notice

Damian Nel is authorised as Luminera's eServices Admin Officer for portal administration. That administrative role is not a Deputy Information Officer appointment and does not replace the Information Officer.

4. Personal information we collect

Data subject / context	Examples of personal information
Prospective and existing customers; representatives	Name, company, job title, email, telephone number, company or registration details, project location, physical or delivery address, product interests, requirements, correspondence, quotations, contracts, approvals, order and delivery details, payment references and proof of payment.
Website visitors and form users	Information submitted through forms; IP address; browser or device information; access date and time; requested pages; security events; server logs; limited analytics and cookie information.
Suppliers, manufacturers and service providers	Names, company details, registration and tax information where required, contact details, addresses, bank details, agreements, quotations, commercial and technical correspondence, performance and payment records.
Directors, shareholders and authorised representatives	Names, contact details, identity or registration details where legally required, signatures, appointment records, corporate roles, declarations, access authorisations and governance records.
Professional advisers, logistics partners, regulators and requesters	Names, firms, contact details, instructions, correspondence, billing, delivery and customs information, requests, complaints, decisions and supporting records.

Luminera currently accepts payment by EFT or bank transfer and does not collect payment-card details through its website.

5. How we collect personal information

- Directly from you when you submit a website form, send an email or message, call us, request a quotation, approve an order, make a payment or otherwise communicate with Luminera.
- From a company, employer, colleague, appointed professional or authorised representative acting in connection with a project or business relationship.
- From suppliers, manufacturers, freight forwarders, customs-clearing agents, couriers, professional advisers and other service providers involved in a legitimate business process.
- Automatically through website, email, server, security and access logs, cookies or similar technologies where enabled.
- From public company records, business directories, professional websites or other lawful public sources where reasonably necessary to verify business information or make contact.

6. Purposes and lawful grounds for processing

Purpose	Typical POPIA justification
Responding to enquiries, assessing project requirements and preparing quotations	Your consent where appropriate; steps taken at your request before a contract; and Luminera's legitimate interest in responding to genuine business enquiries.
Managing approvals, orders, contracts, supply, delivery, support and payment records	Performance of a contract or steps related to it; compliance with legal obligations; and protection of legitimate business and customer interests.
Communicating specifications and arranging manufacturing, import, freight, customs, courier or delivery activities	Contractual necessity, legitimate interests and, where appropriate, consent or another lawful justification.
Operating and securing the website, email, database, backups and administrative systems	Luminera's legitimate interests in security, service continuity, fraud prevention, troubleshooting and recordkeeping; and legal obligations where applicable.

Purpose	Typical POPIA justification
Corporate governance, tax, accounting, regulatory, PAIA/POPIA and dispute management	Compliance with legal obligations and protection of Luminera's or a third party's legitimate interests.

Where information is requested as mandatory, the field or requirement will ordinarily be identified. If required information is not provided, Luminera may be unable to assess the enquiry, prepare a quotation, conclude or perform an agreement, arrange delivery, verify payment or meet a legal obligation.

7. Website and technical information

When a person visits or uses the Luminera website, limited technical information may be processed automatically. This may include an IP address, browser or device type, operating system, referring page, requested pages, access date and time, approximate location derived from network information, server responses, security events and diagnostic information.

Technical information is used to deliver pages, protect the website and quotation form, manage sessions, prevent abuse, investigate errors, maintain availability, understand basic website usage and preserve evidence of security events. Luminera does not use technical logs to make decisions about a person unrelated to these legitimate purposes.

8. Cookies, security tools and analytics

The website may use essential cookies or similar technologies that are necessary for security, form protection, authentication, session management and basic website operation. These technologies may not function correctly if blocked.

Luminera plans to use Cloudflare services, which may include DNS, content delivery, security, Turnstile form protection and privacy-focused web analytics. Cloudflare or another authorised provider may process limited technical information on Luminera's behalf. A separate Cookie and Analytics Notice will provide additional details once the final production configuration is confirmed.

No marketing profiling at launch

Luminera does not currently intend to use advertising cookies, behavioural advertising or automated marketing profiles at public launch. Any material future change will require updated notice and, where necessary, an appropriate consent mechanism.

9. Sharing and categories of recipients

Information category	Possible recipients
Contact, project, specification and order information	Luminera directors and authorised representatives; relevant suppliers and manufacturers; customer-appointed professionals where necessary.
Delivery and logistics information	Manufacturers, freight forwarders, customs-clearing agents, insurers, couriers, transport providers and delivery recipients.
Financial and payment information	Banks, accountants, tax advisers, auditors and authorities where required. Luminera does not collect card details through the website.
Website, email and technical information	Zoho, Cloudflare, website hosting, database, backup, cybersecurity, analytics and technical-support providers acting under appropriate terms.

Information category	Possible recipients
Legal and compliance information	Attorneys, professional advisers, courts, the Information Regulator, law-enforcement bodies and government authorities where permitted or required by law.

Luminera does not sell personal information. Information is shared only where reasonably necessary for a stated purpose, with appropriate access restrictions and confidentiality or contractual safeguards where suitable.

10. Cross-border processing and transfers

Personal information may be transferred to, stored in or accessed from outside South Africa when reasonably necessary for Luminera's operations. This may include:

- sending limited customer, project, configuration or delivery information to manufacturers or suppliers in China or another relevant supplier jurisdiction;
- using international email, cloud, domain, security, backup or technical-support providers whose systems or personnel may be located in multiple countries; and
- sharing necessary information with international freight, insurance or logistics partners.

Luminera will limit cross-border transfers to information reasonably necessary for the relevant purpose and will apply a lawful transfer condition under section 72 of POPIA. Depending on the circumstances, safeguards may include contractual protections, appropriate provider terms, confidentiality obligations, data minimisation, secure transmission, access controls, consent where suitable or another lawful basis.

Data-minimisation commitment

Luminera will not routinely send identity documents, banking credentials or unrelated customer correspondence to foreign suppliers. Delivery addresses and recipient contact details will be shared only when reasonably necessary for manufacturing, logistics or delivery.

11. Retention, deletion and de-identification

Record category	Ordinary retention approach
Unsuccessful enquiry with no formal quotation, order, contract or ongoing relationship	Up to 12 months after the last meaningful contact. Thereafter the information will ordinarily be securely deleted or de-identified unless a lawful or legitimate reason requires longer retention.
Spam, test submissions and clearly invalid enquiries	May be deleted sooner once they are no longer needed for troubleshooting, fraud prevention, security evidence or abuse management.
Quotations, contracts, orders and necessary correspondence	Retained for the period reasonably required for the transaction, contractual administration, warranty records, legitimate business needs, disputes, claims and applicable legal obligations.
Invoices, proof of payment, accounting and tax records	Retained for applicable legal, accounting and tax periods. Certain South African tax records may need to be retained for at least five years from the relevant statutory starting point.
Security, access and technical logs	Retained for a proportionate period based on security, troubleshooting, system-integrity and legal needs, then deleted or aggregated where appropriate.

Deletion from active systems may not immediately remove every copy from protected backup media. Backup copies will be isolated from ordinary use and removed or overwritten according to the applicable backup cycle, unless retention is required for recovery, security, legal or evidentiary reasons.

12. Information-security safeguards

Luminera applies reasonable technical and organisational safeguards appropriate to its size, systems and risk profile. These include, where relevant:

- password-protected accounts and devices, with access restricted to authorised persons;
- multi-factor authentication where available, secure credential management and periodic access review;
- device PINs or passwords, automatic software and security updates, and antivirus or built-in protection;
- encryption in transit through secure website, email and cloud services where supported;
- secure backups and recovery arrangements for important records;
- data minimisation, controlled sharing, incident handling and secure deletion or de-identification; and
- selection and review of service providers with appropriate confidentiality and security measures.

No security measure can guarantee absolute protection. Luminera will review and improve safeguards as its systems, suppliers, risks and business activities develop.

13. Your rights and how to exercise them

Subject to POPIA, PAIA and other applicable law, a data subject may have the right to:

- ask whether Luminera holds personal information about them and request access to that information;
- request correction, updating, deletion or destruction of inaccurate, irrelevant, excessive, outdated, incomplete, misleading or unlawfully obtained information;
- object, on reasonable grounds, to processing based on certain POPIA justifications;
- withdraw consent where processing depends on consent, without affecting processing already lawfully performed;
- request restriction of a record where POPIA permits or requires restriction;
- complain to Luminera or the Information Regulator; and
- exercise any further right available under applicable law.

Requests should be sent to info@lumineraafrica.com and clearly describe the information or action requested. Luminera may require reasonable proof of identity or authority to protect the requester and other persons. Luminera will respond within the periods required by applicable law and may refuse or limit a request where a lawful ground applies.

Official request forms

The Information Regulator publishes POPIA Form 1 for objections and POPIA Form 2 for correction, deletion or destruction requests. Access to records may also be requested under PAIA using the procedures in Luminera's PAIA Manual.

14. Direct marketing and communications

Luminera does not currently conduct promotional campaigns or maintain a marketing mailing list. Communications are limited to enquiries, quotations, orders, project administration, customer support, compliance, security and other necessary business correspondence.

If Luminera introduces direct marketing in future, it will do so in accordance with POPIA, including section 69 for unsolicited electronic communications. Marketing consent will not be pre-ticked, and recipients will be given a practical way to opt out where required.

15. Children and special personal information

Luminera does not intentionally collect personal information about children or special personal information through its ordinary website or quotation process. Users should not submit health, biometric, religious, political, criminal-behaviour or other special information unless Luminera has specifically requested it for a lawful and necessary purpose.

If Luminera becomes aware that such information was submitted unnecessarily, it may delete or restrict the information and may contact the person who submitted it to clarify the appropriate action.

16. Automated decision-making

Luminera does not currently use solely automated decision-making that produces legal consequences or similarly significant effects for customers or website users. Quotations, product alignment and commercial decisions involve human review.

17. Security compromises

If there are reasonable grounds to believe that personal information under Luminera's control has been accessed or acquired by an unauthorised person, Luminera will investigate, contain and document the incident. Luminera will notify the Information Regulator and affected data subjects where and in the manner required by section 22 of POPIA, unless a lawful instruction or exception applies.

A person who suspects that information supplied to Luminera has been lost, disclosed incorrectly or accessed without authority should report the matter promptly to info@lumineraafrica.com.

18. Complaints and the Information Regulator

Luminera encourages a person to contact the Information Officer first so that the concern can be investigated and, where appropriate, corrected. This does not remove the person's right to approach the Information Regulator.

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

19. Availability, updates and approval

This Privacy Notice will be available on <https://lumineraafrica.com> and may also be requested from info@lumineraafrica.com. Luminera may update the Notice when its products, website, service providers, systems, processing activities, legal obligations or contact details change. The latest published version will replace earlier public versions and will state its version and effective date.

Material changes that significantly affect data subjects will be communicated through an appropriate website notice, direct communication or another reasonable method where required.

Document owner	Michael Bester - Information Officer
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Effective date	Upon website publication
Next review	At least annually or earlier if a material change occurs

Approval record

Name	Capacity	Approval
Michael Bester	Information Officer	Approved 30 July 2026
Damian Nel	Director	Approved 30 July 2026

The signed master should be retained privately. The public website copy may show the approved version and effective date without reproducing handwritten signatures.