

# ZINHLE NOVAZI

ADMITTED ATTORNEY • DATA PROTECTION & ACCESS TO INFORMATION • AI GOVERNANCE

## PERSONAL PARTICULARS AND STATUTORY ELIGIBILITY

|                     |                                                                      |             |                       |
|---------------------|----------------------------------------------------------------------|-------------|-----------------------|
| FULL NAME           | Zinhle Novazi                                                        | CITIZENSHIP | South African         |
| PROFESSIONAL STATUS | Admitted Attorney of the High Court of South Africa (non-practising) | CAPACITY    | FULL-TIME / PART-TIME |

## EXECUTIVE PROFILE

South African admitted attorney (non-practising) and legal academic with experience across privacy and data protection, access to information, technology regulation, banking, and civil-society leadership. Lecturer at Stellenbosch University and PhD candidate at the University of Groningen, specialising in the accountability of automated credit scoring under South African and European Union law. Member of the Security, Technology & e-Privacy Research Group (STeP).

## DIRECT ALIGNMENT WITH THE REGULATOR'S MANDATE

- Legal qualification.** Admitted attorney with professional experience in privacy compliance, regulatory advice, legal drafting and dispute-related research.
- Privacy and data protection.** Published and applied expertise in POPIA, GDPR, consent, automated decision-making, data-subject rights and responsible information processing.
- Access to information.** Current research examines the interaction between PAIA section 50 and POPIA section 71 in enabling consumers to obtain information and contest automated credit decisions.
- Technology and policy monitoring.** Doctoral and peer-reviewed research monitors the effects of AI, credit-scoring systems and digital platforms on privacy, equality, consumer protection and redress.
- Parliamentary and public-sector experience.** Former legal researcher to a parliamentary portfolio committee, with experience translating complex evidence into institutional frameworks for oversight and accountability.
- Education and stakeholder engagement.** University teaching, public speaking and entrepreneurship programmes demonstrate an ability to communicate rights and regulatory obligations to specialist and non-specialist audiences, including underserved communities.

## CORE EXPERTISE

POPIA and GDPR • PAIA and access to information • AI and automated decision-making • Regulatory research and policy advice • Consumer and credit regulation • Governance and oversight • Comparative and cross-border law

## PRIVACY, TECHNOLOGY AND ACADEMIC LEADERSHIP

- Expert Reference Group on Digital Public Infrastructure | Stellenbosch University | South Africa** Feb 2026-Present
- We support an evidence-based understanding of the regulatory frameworks that govern digital public infrastructure in South Africa.
  - DPI, the shared digital systems for identity, payments and data exchange, can only deliver economic and social value if the surrounding laws, regulations and policies keep pace. We work to clarify what that regulatory framework should look like so DPI can be deployed responsibly.
- Lecturer in Mercantile Law | Stellenbosch University | South Africa** Jul 2024-Present
- Research and teach data protection, automated decision-making, AI governance, cybersecurity, e-commerce and consumer law, with particular focus on POPIA and rights-based accountability.
  - Co-designed the Law and Technology curriculum and taught undergraduate and postgraduate courses in cross-border transactions and international trade finance.
  - Supervised seven LLM researchers, with three graduates to date; serve as external LLM moderator and peer reviewer for South African and international law journals.

- Privacy and Technology Law Consultant | Novazi Investment Holdings** | South Africa **Jul 2023-Present**
- Advise organisations on POPIA and GDPR compliance, privacy-policy design, cross-border data protection and bank-secrecy implications.
  - Translate regulatory requirements into practical guidance for banking products and operations across multiple jurisdictions.
- Consultant and Director | Heavy Chef Foundation** | South Africa **Jan 2021-Present**
- Support governance, strategic growth and stakeholder relationships across the Foundation's partners, trustees and members.
  - Facilitate 10-week entrepreneurship programmes for township founders and women in a gender-based-violence shelter, covering automation, financial capability, sustainability, leadership and regulatory compliance.
- Teaching Associate, Cloud Legal Project | Queen Mary University of London** | United Kingdom **Sep 2021-Sep 2022**
- Promoted from Project Associate on a QMUL-Microsoft collaboration examining cloud services, digital markets and technology regulation.
  - Developed accessible MOOC content on the tax and regulatory implications of digitalisation, including case studies, assessments and curated readings.

## LEGAL, FINANCIAL AND PUBLIC-SECTOR EXPERIENCE

- Tax and Fiduciary Specialist | Investec Bank** | Johannesburg **Mar 2021-Jul 2023**
- Developed cross-border tax, estate and fiduciary-planning recommendations for high-net-worth individuals and multigenerational families in a highly regulated banking environment.
  - Drafted legal memoranda involving cross-border tax issues in various jurisdictions, e.g., the United Kingdom, Australia, the United States, and Europe, and advised on exchange-control and international tax structuring matters.
  - On sabbatical between September 2021- September 2022 to complete studies abroad.
- Candidate Attorney | Tabacks** | Johannesburg **Dec 2018-Feb 2021**
- Advised corporate and trust clients on GDPR and POPIA compliance, tax planning and disputes, domestic and international estate structuring and intellectual-property licensing.
  - Conducted comparative legal research and drafted client advice on complex cross-border regulatory issues.
- Researcher, Corporate Intelligence and Political Risk | S-RM** | South Africa **Jul 2018-Dec 2018**
- Synthesised multi-source intelligence into concise reports for government and public-sector clients; promoted from Consultant to Researcher.
- Legal Researcher | Portfolio Committee on Public Enterprises, Parliament** | South Africa **Jul 2017-Sep 2017**
- Provided legal research and guidance on corporate governance, public procurement and parliamentary accountability.
  - Developed a legal institutional framework on Eskom board appointments, procurement and the parliamentary inquiry process to support committee oversight.
- Teaching Assistant and Tutor | University of Cape Town** | South Africa **Feb 2016-Dec 2017**
- Coordinated 33 tutorials and 24 tutors for a cohort of 467 students, supporting curriculum delivery, assessment and academic administration.

## ACADEMIC QUALIFICATIONS

- PhD in Law | University of Groningen** **2025-2028 (expected)**
- Research:** Comparative regulation of algorithmic credit scoring in South Africa and the European Union, focusing on fairness, transparency, accountability and redress.
- Supervisor:** Professor Jeanne Mifsud Bonnici.
- LLM in Taxation Law | University of the Witwatersrand** **2023**
- Dissertation:** 'Taxing Facebook: User Data and Participation as Taxable Assets'.

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| <b>LLM in Technology, Media and Telecommunications Law   Queen Mary University of London</b>                                    | <b>2022</b> |
| <b>Dissertation:</b> 'The New OECD Nexus Rule or a Fox in Sheep's Clothing? A Critique of the Revenue Threshold' (distinction). |             |
| <b>Distinctions:</b> International Tax Law, Esports Law and dissertation; Chevening Scholar.                                    |             |
| <b>LLB   University of Cape Town</b>                                                                                            | <b>2018</b> |
| <b>BSocSci in Politics and Law   University of Cape Town</b>                                                                    | <b>2016</b> |

## PROFESSIONAL STANDING

- ☐ Admitted Attorney of the High Court of South Africa.
- ☐ Legal academic with teaching and research responsibilities in law and technology, privacy, consumer law and international transactions.
- ☐ External LLM moderator for various South African universities, and peer reviewer for South African and international law journals.

## SELECTED PUBLICATIONS AND CURRENT RESEARCH

- ☐ **POPIA and automated decisions.** Novazi, Z (2025) 'Automated Decision-Making and the Right to an Explanation Under POPIA in South Africa: A Legal Perspective', Law, Technology and Humans 7(3), 146-161.
- ☐ **Consent and platform regulation.** Novazi, Z (2025) 'Privacy for Sale? The Legality of the Pay-or-Consent Model in South Africa', Stellenbosch Law Review 36(3), 501-539.
- ☐ **Cross-border digital regulation.** Novazi, Z and Sengwane, K (2026) 'Crypto Taxation and Regulatory Convergence: A Comparative Study of the European Union and South Africa', Intertax 54(5).
- ☐ **PAIA and algorithmic accountability.** Ongoing work considers when technical records underlying automated credit decisions are required for the exercise or protection of rights under PAIA section 50, read with POPIA section 71.

## SELECTED POLICY, PROFESSIONAL AND PUBLIC ENGAGEMENTS

- ☐ **2026.** Policy Innovation Lab, School for Data Science and Computational Thinking - keynote: 'Data Sovereignty and Classification for South Africa's Digital Transformation Roadmap'.
- ☐ **2026.** IAPP Cape Town Chapter Q2 Webinar - invited speaker on South Africa's National Artificial Intelligence Policy, with Dr Andrew Rens.
- ☐ **2026.** British and Irish Law, Education and Technology Association Conference - 'When Law Bows to Code: Article 22 and the Quiet Surrender of Accountability'.
- ☐ **2026.** Atlantic Dialogue on Technology and Regulation, Rio de Janeiro - 'The Bank, the Bot, and the Law: Can Legitimate Interest Justify AI Training?'.
- ☐ **2025.** H.F. Oppenheimer Chair in Human Rights Law Postgraduate Seminar - 'Let Us Level the Playing Field: Empowering Consumers Affected by Algorithmic Credit Scoring'.
- ☐ **2025.** DMA Conference, Brussels - 'Coercion by Design: Consent or Contestability in the Age of Platform Dominance'.
- ☐ **2025.** South African Law Teachers Conference - '404: Victim Protections Not Found: Strengthening Responses to Technology-Facilitated Gender-Based Violence in South Africa' (with R Koekemoer); third runner-up for Best Presenter.

## AWARDS, SCHOLARSHIPS AND RESEARCH FUNDING

- ☐ **2026.** National Research Foundation Black Academics Advancement Programme recipient; HB & MJ Thom Award.
- ☐ **2025.** Rehana Malgas-Enus Award for Research; South African Law Teachers Conference third runner-up for Best Presenter.
- ☐ **2023.** Mail & Guardian 200 Young South Africans.
- ☐ **2021-2022.** Chevening Scholarship.
- ☐ **2014.** Allan Gray Orbis Foundation Scholarship; UCT Humanities Faculty Scholarship and Dean's Merit List.
- ☐ **2012.** Anglo American Scholarship.

## REFERENCES

Professional and academic referees are available on request.