



Privacy Policy

Elint

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All printed copies, and all electronic copies and versions, are considered uncontrolled copies which should be used for reference only.

Approval and Review:

Only approved documents are saved in Elint by the Elint administrator. The Elint administrator certifies that management has reviewed and accepted the document and are aware of all the requirements contained herein and are committed to ensuring their provision.

Elint cms module, manages the review process within the Elint system to ensure the document is reviewed annually by assigned responsible persons.

Roeleen Henning

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Introduction

Elint (“Elint”, “we”, “us”, or “our”) respects your privacy and is committed to protecting your personal information in accordance with the Protection of Personal Information Act 4 of 2013 (“POPIA”), the Promotion of Access to Information Act 2 of 2000 (“PAIA”), and applicable South African legislation.

This Privacy Policy explains how Elint collects, uses, stores, transfers, and protects personal information through the following services:

1. Elint Website
2. Elint Online Store
3. Elint Smart Software
4. Elint Mobile Web Application
5. Any associated Elint compliance or business systems

By using Elint services, you acknowledge that you have read and understood this privacy policy.

Interpretation and Definitions

Interpretation

The words of which the initial letter is capitalized have meanings defined under the following conditions. The following definitions shall have the same meaning regardless of whether they appear in singular or plural.

Definitions

For the purposes of this Privacy Policy:

1. Account: A unique account created for a user to access Elint services.
2. Company: Refers to Elint.
3. Cookies: Small files placed on devices to improve functionality, security, analytics, and user experience.
4. Data Subject: The individual to whom personal information relates.
5. Device: Any computer, mobile phone, tablet, or electronic device used to access Elint services.
6. Information Officer: The designated individual responsible for ensuring compliance with POPIA and PAIA.

7. Operator: A person or entity processing personal information on behalf of a Responsible Party.
8. Personal Information: Information relating to an identifiable, living natural person and, where applicable, an identifiable juristic person, as defined under POPIA.
9. Responsible Party: The public or private body that determines the purpose and means of processing personal information.
10. Service Providers: Third-party entities providing services to Elint, including hosting, infrastructure, development, analytics, backup, communication, and support services.
11. Usage Data: Automatically collected information relating to system access and usage.
12. Website: The Elint website is available at: <https://www.elint.co.za>.

Information Officer

Elint has appointed an Information Officer responsible for POPIA and PAIA compliance.

Information Officer: Roeleen Henning

Email: info@elint.co.za

The Information Officer is responsible for:

1. Monitoring compliance with POPIA
2. Managing data subject requests
3. Handling complaints and queries
4. Coordinating security incident responses
5. Maintaining privacy governance processes

Collecting and Using Your Personal Data

Personal Information We Collect

Elint may collect and process the following personal information:

Customer Information

1. Full names
2. Email addresses
3. Telephone numbers
4. Company information
5. Physical and postal addresses
6. User account information

Employee and User Information

Where clients use Elint systems for operational management, information may include:

1. Employee names
2. Job titles
3. Training records
4. Compliance records
5. Audit records
6. Task records
7. Risk assessment information
8. Uploaded documentation

System Information

1. IP addresses
2. Browser information
3. Device identifiers
4. Login activity
5. Access logs
6. Usage analytics
7. Session information

Information Uploaded Into Elint Systems

Clients may upload:

1. Compliance documentation
2. Safety files
3. Risk registers
4. Audit reports
5. Checklists
6. Improvement records
7. Training records
8. Incident records
9. Supporting evidence documents
10. Dashboards and reporting data

Special Personal Information

Elint does not intentionally collect or process special personal information unless:

1. Required by law;
2. Necessary for compliance management purposes;
3. Explicitly authorised by the client as the Responsible Party; or
4. Consent has been obtained where required.

Clients using Elint systems remain responsible for ensuring lawful processing of special personal information uploaded into the platform.

How We Collect Information

We collect personal information:

1. Directly from users;
2. Through website interactions;
3. Through account registrations;
4. Through system usage;
5. Through uploaded documentation;
6. Through cookies and tracking technologies;
7. Through support communications;
8. Through integrations and APIs where applicable.

Purpose of Processing Personal Information

Elint processes personal information for the following purposes:

1. Providing and maintaining Elint services;
2. Managing user accounts;
3. Delivering contracted services;
4. Providing technical support;
5. Communicating with users;
6. Sending service notifications and updates;
7. Compliance management activities;
8. Security monitoring and fraud prevention;
9. System analytics and improvement;
10. Legal and regulatory compliance;
11. Business continuity and backup management;

12. Contract management;
13. Internal reporting and auditing.

Lawful Basis for Processing

Elint processes personal information based on one or more lawful grounds under POPIA, including:

1. Consent from the data subject;
2. Performance of a contract;
3. Compliance with legal obligations;
4. Legitimate business interests;
5. Protection of legitimate interests of the data subject;
6. Performance of public law duties where applicable.

Sharing and Disclosure of Information

Elint may share personal information with:

1. Service providers;
2. Hosting providers;
3. Software developers;
4. Cloud infrastructure providers;
5. Communication providers;
6. Legal advisors;
7. Regulatory authorities;
8. Business partners where necessary;
9. Auditors and compliance consultants.

All third parties processing personal information on behalf of Elint are required to maintain appropriate confidentiality and security measures.

Elint does not sell personal information.

Operator and Responsible Party Roles

Where clients upload employee, contractor, supplier, or operational data into Elint systems, the client organisation remains the Responsible Party under POPIA.



In such circumstances, Elint acts primarily as an Operator processing personal information on behalf of the client.

Clients are responsible for:

1. Obtaining required consent;
2. Ensuring lawful processing;
3. Providing notices to data subjects;
4. Managing employee privacy obligations;
5. Ensuring uploaded information complies with applicable laws.

Elint processes such information only in accordance with client instructions and contractual obligations.

International Transfer of Information

Personal information may be transferred to and stored on systems located outside South Africa where cloud infrastructure or service providers are utilised.

Elint will only transfer personal information internationally where:

1. The recipient country has adequate data protection laws;
2. Appropriate contractual safeguards are in place;
3. The transfer is necessary for service delivery;
4. The data subject has consented to the transfer; or
5. The transfer is otherwise permitted under POPIA.

Retention of Information

Elint retains personal information only for as long as necessary to:

1. Fulfil the purposes for which the information was collected;
2. Meet contractual obligations;
3. Comply with legal and regulatory requirements;
4. Resolve disputes;
5. Enforce agreements;
6. Maintain business continuity records.

Clients may request deletion or anonymization of information where legally permissible.

Backup archives may be retained for disaster recovery and legal compliance purposes.

Security Safeguards

Elint implements reasonable technical and organisational measures to protect personal information against:

1. Loss;
2. Misuse;
3. Unauthorised access;
4. Disclosure;
5. Alteration;
6. Destruction.

Security controls include:

1. Encrypted HTTPS communication using TLS;
2. Restricted database access;
3. Secure backup systems;
4. Multi-server redundancy;
5. Access-controlled repositories;
6. Firewalls and brute-force protection;
7. Authentication controls;
8. Infrastructure monitoring;
9. Version-controlled backups;
10. Secure cloud hosting environments.

Hosting and Infrastructure

Elint infrastructure is managed through approved service providers and cloud infrastructure platforms.

Backups are maintained securely, and access is restricted to authorised personnel.

Data Subject Rights

Under POPIA, data subjects may have the right to:

1. Request access to personal information;
2. Request correction of inaccurate information;
3. Request deletion or destruction of information;
4. Object to processing;
5. Withdraw consent where processing is based on consent;

6. Lodge complaints with the Information Regulator;
7. Request details regarding processing activities.

Requests may be submitted to the Information Officer using the contact details in this policy.

Proof of identity may be required before requests are processed.

Direct Marketing

Elint may send service-related communications and marketing communications where permitted by law.

Users may opt out of non-essential marketing communications at any time by:

1. Clicking unsubscribe links;
2. Contacting Elint directly; or
3. Updating account preferences.

Elint will not send direct marketing communications where prohibited under POPIA.

Cookies and Tracking Technologies

Elint uses cookies and similar technologies to:

1. Maintain system functionality;
2. Authenticate users;
3. Improve security;
4. Analyse usage trends;
5. Improve user experience.

Users may manage cookie preferences through browser settings.

Where required, users will be presented with cookie notices or consent mechanisms.

Some features may not function correctly if cookies are disabled.

Data Breach Notification

If Elint becomes aware of a security compromise involving personal information, Elint will:

1. Investigate the incident;
2. Take reasonable steps to contain and remediate the breach;
3. Notify affected parties where required;
4. Notify the Information Regulator where legally required;
5. Maintain incident records.

Notifications will be made as soon as reasonably possible where there is a risk to data subjects.

Children's Information

Elint services are not directed toward individuals under the age of 18.

Elint does not knowingly collect personal information from children without appropriate legal authority or consent.

If we become aware that personal information of a child has been unlawfully collected, we will take steps to delete such information.

Third-Party Websites

Elint services may contain links to external websites or services.

Elint is not responsible for the privacy practices, security, or content of third-party websites.

Users are encouraged to review the privacy policies of external websites before providing personal information.

PAIA Manual

Elint maintains a PAIA Manual in accordance with the Promotion of Access to Information Act.

Requests for access to records may be submitted to the Information Officer.

The PAIA Manual is available upon request.



Changes to this Privacy Policy

Elint may update this Privacy Policy periodically.

Updated versions will be published on Elint platforms and may be communicated to users through:

1. Email notifications;
2. System notices; or
3. Website announcements.

Continued use of Elint services after updates constitutes acceptance of the revised policy.

Contact Details

For questions, requests, or complaints regarding this Privacy Policy or personal information processing, contact:

Elint Information Officer

Roeleen Henning

Email: info@elint.co.za

Website: <https://www.elint.co.za>

Information Regulator South Africa

Website: <https://www.justice.gov.za/infoereg/>

Email: infoereg@justice.gov.za