

ECO ELEMENTUM (PTY) LTD

For this document, 'we', 'us', 'our', 'the Company', or 'Eco Elementum Group' means **Eco Elementum (Pty) Ltd** and the entities listed below, including all divisions, subsidiaries, and affiliates operating under the Eco Elementum brand.

Holding Entity:

- **Eco Elementum Investments (Pty) Ltd** - Registration Number: **2018/460270/07**

Subsidiaries & Affiliates:

- **Eco Elementum (Pty) Ltd** – Environmental Services and Solutions - Registration Number: **2012/021578/07**
- **Eco Elementum Engineering (Pty) Ltd** – Environmental Engineering Services- Registration Number: **2017/113908/07**
- **Eco Elementum Intelligence (Pty) Ltd** – Environmental Intelligence, Data and GIS Solutions- Registration Number: **2021/860603/07**
- **Eco Elementum Construction (Pty) Ltd** – Construction Services for Environmental Projects- Registration Number: **2018/460077/07**
- **Eco Elementum Foundation NPC** – Non-Profit Entity for Environmental and Community Development- Registration Number: **2020/604942/08**
- **EcoE Sciences (Pty) Ltd** – Environmental Sciences, Research and Testing - Registration Number: **2018/504326/07**

This policy applies to www.ecoelementum.co.za and any pages we operate for the entities listed above. It explains what we collect online, how we use cookies, and your rights under POPIA.

STANDARD WEBSITE PRIVACY & COOKIES POLICY

Date of compilation: 09/05/2024

Date of revision: 30/09/2025

	Standard Website Privacy and Cookies Policy	Classification
		Public
		Document Type
		Privacy Policy
		Version / Date
		1.0 / 30.09.2025
		Page Number
		Page 2 of 19

TABLE OF CONTENTS

1. Introduction	3
2. What is personal information?	4
3. Is the supply of the personal information voluntary or mandatory?	5
4. When will we process your personal information?	7
5. What is special personal information?	7
6. When will we process your special personal information?	8
7. When and from where we obtain personal information about you?	8
8. Collecting personal information from third parties	9
9. Reasons we need to process your personal information.	10
10. Retain records for historical, statistical, and research purposes	11
11. How we use your personal information for marketing	12
12. When how and with whom we share your personal information?	12
13. Under what circumstances will we transfer your information to other countries?	13
14. How we secure your personal information	13
15. How long do we keep your personal information?	14
16. Our cookie policy	14
16.1 Use of cookies on the eco elementum website	14
16.2 Your right of access, correction, and deletion	15
16.3 Your right to object, withdraw consent, and lodge a complaint	15
17. The contact details for the information regulator are as follows:	15
18. How can you get in touch with us?	16



	Standard Website Privacy and Cookies Policy	Classification
		Public
		Document Type
		Privacy Policy
		Version / Date
		1.0 / 30.09.2025
		Page Number
		Page 3 of 19

1. INTRODUCTION

- 1.1** Eco Elementum Group, as listed on the cover page, is the Responsible Party in terms of the Protection of Personal Information Act, 2013. POPIA took full effect on 1 July 2021. When this Privacy Policy refers to we, us, or our, it refers to the specific Eco Elementum entity engaged. When it refers to you or your, it refers to the data subject whose personal information we process. As the Responsible Party, the relevant entity determines the purpose for which personal information is collected and the manner in which it is processed. The entity ensures lawful processing aligned to the conditions in Chapter 3 of POPIA.
- 1.2** If you are a client, applicant, landowner, community stakeholder, regulator, supplier, contractor, consultant, employee, or a visitor to www.ecoelementum.co.za, you are a Data Subject. You are the individual or a representative of a business whose personal information we process when you interact with an Eco Elementum entity.
- 1.3** Your personal information is protected by law. You have the right to know when personal information is collected, why it is collected, how it will be used, and with whom it might be shared. For example:
- 1.3.1 Clients and applicants. We collect identification and contact details, project and site information, permits, and billing details to deliver services and manage projects.
 - 1.3.2 Landowners and affected parties. We collect names, contact details, property descriptors, and participation records to run lawful public participation and engagement.
 - 1.3.3 Regulators and authorities. We collect official contact details, reference numbers, and correspondence to submit applications and meet compliance duties.
 - 1.3.4 Service providers, suppliers, and consultants. We collect company registration details, tax and B-BBEE info, banking confirmation, and contact details to onboard and pay vendors.
 - 1.3.5 Employees and contractors. We collect HR, payroll, qualifications, licenses, access, and HSE records to manage the employment relationship and site access.
- 1.4** In all cases, you remain the Data Subject, and the relevant Eco Elementum entity remains the Responsible Party that must ensure your personal information is collected, processed, and safeguarded in accordance with POPIA.
- 1.5** This Privacy Policy also serves as our notification to you under Section 18 of POPIA. It explains:
- 1.5.1 The categories of personal information we collect.
 - 1.5.2 The purposes for which your information is processed.
 - 1.5.3 The manner in which it is processed.



T: 012 807 0383 | E: info@ecoe.co.za | W: www.ecoe.co.za
A: 472 Botterklapper Street, Block@Nature, Block B, Die Wilgers, Pretoria East, 0184

	Standard Website Privacy and Cookies Policy	Classification
		Public
		Document Type
		Privacy Policy
		Version / Date
		1.0 / 30.09.2025
		Page Number
		Page 4 of 19

1.5.4 The recipients with whom information might be shared where necessary and lawful.

1.5.5 The security measures used to protect your information.

1.6 We process personal information such as identity and contact details, project and site data, company or registration details if you represent a juristic person, payment and invoicing information, correspondence with Eco Elementum entities, and supporting project documentation. This information is collected and processed to:

1.6.1 Deliver environmental, engineering, intelligence, construction, and related services.

1.6.2 Communicate with clients, stakeholders, regulators, suppliers, and employees.

1.6.3 Manage supplier and employee relationships.

1.6.4 Comply with obligations under environmental, tax, labour, and company law.

1.7 Processing refers to any activity involving personal information. This includes collection, receipt, storage, use, updating, disclosure to authorised third parties, or secure destruction when no longer required. The relevant Eco Elementum entity processes personal information where it is necessary to perform services, comply with a legal obligation, or where you have given consent.

1.8 We might combine personal information obtained from different sources, such as information collected through our website, correspondence with you, or our project systems. Combined information is used only for the purposes set out in this Privacy Policy.

1.9 By using our website, submitting an enquiry, participating in projects, supplying services, or otherwise interacting with us, you acknowledge that the relevant Eco Elementum entity, as the Responsible Party, processes your personal information in line with this Privacy Policy and POPIA's conditions for lawful processing.

2. WHAT IS PERSONAL INFORMATION?

2.1 Personal information is any information that identifies you or relates specifically to you. Under POPIA, personal information also includes information about juristic persons such as companies and close corporations. This means the personal information of clients, applicants, landowners, community stakeholders, regulators, suppliers, contractors, consultants, employees, job applicants, donors, beneficiaries, and visitors to www.ecoelementum.co.za is protected by law. This section applies to the Eco Elementum Group entities listed on the cover page and referenced in the introduction.

2.2 Personal information includes details such as your name, identity or passport number, age, date of birth, marital status, gender, pregnancy, race, ethnic origin, national origin, colour, language, culture, social origin, conscience, belief, religion, and sexual orientation. It also includes information about your physical or mental health, disability, well-being, biometric information, medical history, and any criminal history.



T: 012 807 0383 | E: info@ecoe.co.za | W: www.ecoe.co.za
A: 472 Botterklapper Street, Block@Nature, Block B, Die Wilgers, Pretoria East, 0184

	Standard Website Privacy and Cookies Policy	Classification
		Public
		Document Type
		Privacy Policy
		Version / Date
		1.0 / 30.09.2025
		Page Number
		Page 5 of 19

- 2.3** Personal information extends to your contact and identifying details, such as your residential or business address, postal address, telephone numbers, email addresses, online identifiers, location information, and any other symbols or unique assignments linked to you. It further includes your education history, employment history, financial records, tax information, and correspondence exchanged with Eco Elementum Group entities. It also includes your personal views, preferences, and opinions, as well as the views or opinions of others about you.
- 2.4** For suppliers, service providers, consultants, and other juristic persons, personal information includes company registration details, VAT numbers, B-BBEE certificates, director information, banking details, safety files, and compliance documents required for onboarding, procurement, and payment.
- 2.5** For employees and job applicants, personal information includes payroll and remuneration records, bank account details, tax numbers, UIF and retirement fund contributions, emergency contact and next-of-kin details, disciplinary and grievance records, leave records, timesheets, and training or certification records needed for occupational health and safety compliance.
- 2.6** To meet health and safety obligations, an Eco Elementum entity also processes incident and injury reports, occupational medical certificates, fitness-for-duty results, induction records, and surveillance results where required by law.
- 2.7** When you interact with our website, personal information includes technical details such as your IP address, cookies, device identifiers, login details for secure portals, and your browsing activity.
- 2.8** As the Responsible Party, the relevant Eco Elementum entity ensures that all personal information is collected, used, stored, and safeguarded lawfully and securely in accordance with POPIA.

3. IS THE SUPPLY OF THE PERSONAL INFORMATION VOLUNTARY OR MANDATORY?

- 3.1** The supply of certain personal information is mandatory, meaning we have to collect this personal information from you by law. If you do not supply this information, we cannot comply with our legal obligations. In this regard, if you do not supply this personal information, we cannot do business with you. We collect personal information as is required by the following legislation:
- Companies Act, 71 of 2008
 - Nonprofit Organisations Act 71 of 1997
 - Tax Administration Act 28 of 2011
 - Basic Conditions of Employment Act, 75 of 1997
 - Labour Relations Act, 66 of 1995
 - Employment Equity Act, 55 of 1998
 - Skills Development Act, 97 of 1998
 - Unemployment Insurance Act, 63 of 2001
 - Occupational Health and Safety Act, 85 of 1993



T: 012 807 0383 | E: info@ecoe.co.za | W: www.ecoe.co.za
A: 472 Botterklapper Street, Block@Nature, Block B, Die Wilgers, Pretoria East, 0184

	Standard Website Privacy and Cookies Policy	Classification
		Public
		Document Type
		Privacy Policy
		Version / Date
		1.0 / 30.09.2025
		Page Number
		Page 6 of 19

- Compensation for Occupational Injuries and Diseases Act, 130 of 1993
- Income Tax Act, 58 of 1962
- Value-Added Tax Act, 89 of 1991
- Broad-Based Black Economic Empowerment Act, 53 of 2003
- Protection of Personal Information Act, 4 of 2013
- Promotion of Access to Information Act, 2 of 2000
- Electronic Communications and Transactions Act, 25 of 2002
- National Archives and Records Service Act, 43 of 1996
- Trade Marks Act, 194 of 1993
- Copyright Act, 98 of 1978
- Patents Act, 57 of 1978
- Designs Act, 195 of 1993
- Financial Sector Regulation Act, 9 of 2017
- Banks Act, 94 of 1990; Insurance Act, 18 of 2017
- Cybercrimes Act, 19 of 2020; POPIA
- Preferential Procurement Policy Framework Act, 5 of 2000
- Public Finance Management Act, 1 of 1999
- National Environmental Management Act, 107 of 1998 and EIA Regulations
- National Water Act, 36 of 1998
- Water Services Act, 108 of 1997
- National Environmental Management: Waste Act, 59 of 2008 and Waste Classification Regulations
- National Environmental Management: Air Quality Act, 39 of 2004
- National Environmental Management: Biodiversity Act, 10 of 2004
- National Environmental Management: Protected Areas Act, 57 of 2003
- National Heritage Resources Act, 25 of 1999
- National Forests Act, 84 of 1998
- National Environmental Management: Integrated Coastal Management Act, 24 of 2008
- National Environmental Management Act Financial Provisioning Regulations (current), including GN R1147 references
- Mine Health and Safety Act, 29 of 1996
- Construction Industry Development Board Act, 38 of 2000
- National Building Regulations and Building Standards Act, 103 of 1977
- National Road Traffic Act, 93 of 1996
- Spatial Data Infrastructure Act, 54 of 2003
- Accreditation for Conformity Assessment, Calibration and Good Laboratory Practice Act, 19 of 2006 (SANAS)
- Provincial Nature Conservation Ordinances and related permitting frameworks

3.2 In other instances, the supply of personal information is voluntary, which means there is no law imposed on us to collect this personal information. Even though there is no law that imposes the collection of the personal information, we require the personal information to deliver the products and/or services to you. In this regard, if you do not supply the personal information, we cannot do business with you.



T: 012 807 0383 | E: info@ecoe.co.za | W: www.ecoe.co.za
A: 472 Botterklapper Street, Block@Nature, Block B, Die Wilgers, Pretoria East, 0184

	Standard Website Privacy and Cookies Policy	Classification
		Public
		Document Type
		Privacy Policy
		Version / Date
		1.0 / 30.09.2025
		Page Number
		Page 7 of 19

4. WHEN WILL WE PROCESS YOUR PERSONAL INFORMATION?

4.1 This section applies to the Eco Elementum Group entities listed on the cover page and referenced in the introduction. Eco Elementum will only process your personal information when it is lawful to do so and where the processing is directly related to our environmental, engineering, construction, data and GIS, and foundation activities. We will process your personal information in the following circumstances:

- 4.1.1 We will process your personal information if you have given us your consent. For example, if you agree to receive project or stakeholder updates, newsletters, or information about our services.
- 4.1.2 We will process your personal information if a person who is legally authorised by you, by law, or by a court of law has given consent on your behalf.
- 4.1.3 We will process your personal information if it is necessary to conclude a contract with you or to perform under an existing contract. For example, during proposals and tenders, supplier onboarding, purchase orders, invoicing and payments, project delivery, site access and inductions, NDAs, and subcontracting.
- 4.1.4 We will process your personal information if a specific law requires or permits us to do so. For example, environmental permitting and compliance submissions under applicable environmental legislation, health and safety records, employment records, and tax and company records.
- 4.1.5 We will process your personal information if it is required to protect or pursue your legitimate interests, our legitimate interests, or those of a third party. For example, securing systems, preventing fraud, quality and audit checks, managing disputes, enforcing agreements, engaging insurers and legal representatives, or working with regulators during investigations.
- 4.1.6 We will process your personal information if it is necessary to protect life or health during an emergency or onsite incident, consistent with health and safety duties and POPIA.

5. WHAT IS SPECIAL PERSONAL INFORMATION?

- 5.1** Special personal information is a category of personal information that POPIA protects with additional safeguards because of its sensitivity. It refers to information that reveals your race, ethnic origin, trade union membership, political persuasion, religious or philosophical beliefs, health, sex life, or sexual orientation. It also includes biometric information and any information relating to alleged or proven criminal behaviour.
- 5.2** For the Eco Elementum Group entities listed on the cover page and referenced in the introduction, special personal information is not processed routinely. Processing occurs only if the law requires it, if you have given consent, or if it is necessary to establish, exercise, or defend a right or obligation.
- 5.3** Project and service delivery context. Special personal information is processed only where strictly necessary. Examples include health information for site access fitness, incident and injury reports, medical surveillance results required under occupational health and safety laws, and biometric identifiers used for controlled site access. During statutory public participation, you might include beliefs or opinions in submissions. If you include such information, it is processed only to meet legal participation and record-keeping duties.



T: 012 807 0383 | E: info@ecoe.co.za | W: www.ecoe.co.za
A: 472 Botterklapper Street, Block@Nature, Block B, Die Wilgers, Pretoria East, 0184

	Standard Website Privacy and Cookies Policy	Classification
		Public
		Document Type
		Privacy Policy
		Version / Date
		1.0 / 30.09.2025
		Page Number
		Page 8 of 19

- 5.4** Employees and job applicants. Special personal information is processed where required by law or where relevant to the employment relationship. This includes medical certificates for sick leave, records of workplace injuries, medical surveillance for specific roles, and criminal record checks where the role demands screening for safety, integrity, or regulatory purposes. Trade union membership is processed for labour relations and statutory reporting.
- 5.5** Vendors and professional service providers. Special personal information is processed only if a contract, law, or site requirement demands it. Examples include criminal checks for high-risk work, biometric identifiers for access control, or health certifications for hazardous environments.
- 5.6** No marketing use. Special personal information is not processed for marketing or general business development.
- 5.7** Where special personal information is processed, it is handled in strict compliance with POPIA's requirements and limited to purposes directly linked to contractual or statutory obligations. The relevant Eco Elementum entity, as Responsible Party, ensures the highest level of confidentiality and protection in line with the conditions for lawful processing under POPIA.

6. WHEN WILL WE PROCESS YOUR SPECIAL PERSONAL INFORMATION?

- 6.1** We will process your special personal information only where the law allows it or where it is strictly necessary for our operations. We will process your special personal information in the following circumstances:
- 6.1.1 You have provided explicit consent. For example, you agree to the use of medical or biometric data for site access or incident reporting.
 - 6.1.2 The information is required for human resources or payroll purposes. For example, medical certificates for sick leave, disability claims, UIF, occupational health surveillance records, or retirement fund contributions.
 - 6.1.3 Processing is necessary to create, exercise, or protect a right or obligation in law. For example, disciplinary proceedings, grievance processes, litigation, or compliance with labour and health and safety legislation.
 - 6.1.4 Processing is required for statistical or research purposes within the Group, provided all POPIA conditions are met, and the information is de-identified where possible.
 - 6.1.5 You have made your special personal information publicly available.
 - 6.1.6 A law requires processing. For example, the Occupational Health and Safety Act, the Compensation for Occupational Injuries and Diseases Act, the National Environmental Management Act and related regulations, the Companies Act, or tax legislation.
 - 6.1.7 We process limited race or ethnic information for employment equity reporting as required by the Employment Equity Act.
 - 6.1.8 We process health information to assess fitness for work, manage incident investigations, comply with site rules, or enforce a legal obligation.

7. WHEN AND FROM WHERE WE OBTAIN PERSONAL INFORMATION ABOUT YOU?



T: 012 807 0383 | E: info@ecoe.co.za | W: www.ecoe.co.za
A: 472 Botterklapper Street, Block@Nature, Block B, Die Wilgers, Pretoria East, 0184

	Standard Website Privacy and Cookies Policy	Classification
		Public
		Document Type
		Privacy Policy
		Version / Date
		1.0 / 30.09.2025
		Page Number
		Page 9 of 19

7.1 Eco Elementum Group collects personal information from the following sources:

- 7.1.1 Directly from you when you submit enquiries, complete site access or onboarding forms, provide supporting documents, or communicate with us.
- 7.1.2 From a public record, such as company registration information, regulator databases, gazettes, or court records.
- 7.1.3 From an area where you have deliberately made it public, such as a professional profile, industry directory, or public website.
- 7.1.4 Based on your use of our services, for example when you submit online forms, upload documents to project portals, or participate in public participation processes.
- 7.1.5 Based on how you engage with us, including emails, letters, telephone calls, meetings, consultations, or surveys.
- 7.1.6 From a third party, such as a client, principal contractor, consultant, laboratory, auditor, or financial institution involved in the project or business relationship.
- 7.1.7 From another source where you have given us authority to do so, for example where your employer or appointed representative shares project or site access information with us.

7.2 Eco Elementum Group will never use special personal information for marketing, sales, or general client interactions. Where we must process special personal information, strict safeguards apply to ensure lawful collection, use, storage, and protection in accordance with POPIA.

8. COLLECTING PERSONAL INFORMATION FROM THIRD PARTIES

8.1 If the law requires it, we will ask for your consent before collecting your personal information from third parties. We collect personal information from the following parties to support our operations and legal obligations:

- 8.1.1 Project partners and Eco Elementum Group entities where joint delivery requires information exchange.
- 8.1.2 Your employer, principal, or authorised representative where information is necessary for project delivery, site access, or HR purposes.
- 8.1.3 Attorneys, auditors, tracing agents, or debt collectors who assist with enforcing agreements, recovering amounts, conducting audits, or handling legal proceedings.
- 8.1.4 Payment processors and banks that enable verified payments and reconciliations.
- 8.1.5 Insurers and brokers that facilitate liability cover, claims, or risk management.
- 8.1.6 Law enforcement and fraud prevention agencies where verification or investigations require information sharing.
- 8.1.7 Regulatory authorities, industry bodies, and government departments where reporting or compliance applies.
- 8.1.8 Trustees, executors, or curators appointed by a court of law where information is required for estates or legal proceedings.
- 8.1.9 Approved service providers and contractors, including IT providers and secure data processors, who support systems and operations under contract.



T: 012 807 0383 | E: info@ecoe.co.za | W: www.ecoe.co.za
A: 472 Botterklapper Street, Block@Nature, Block B, Die Wilgers, Pretoria East, 0184

	Standard Website Privacy and Cookies Policy	Classification
		Public
		Document Type
		Privacy Policy
		Version / Date
		1.0 / 30.09.2025
		Page Number
		Page 10 of 19

8.1.10 Courts of law, tribunals, or statutory dispute resolution forums where disclosure is required.

9. REASONS WE NEED TO PROCESS YOUR PERSONAL INFORMATION.

9.1 Eco Elementum Group processes personal information only for lawful purposes that enable us to operate effectively in environmental, engineering, construction, data and GIS, and foundation activities.

- 9.1.1 Clients, stakeholders, and participants
 - 9.1.1.1 Process, validate, and administer projects, permits, impact assessments, compliance monitoring, and stakeholder engagement.
 - 9.1.1.2 Communicate outcomes, respond to enquiries, and record submissions.
 - 9.1.1.3 Verify identity, property descriptors, and banking information to prevent fraud and ensure accurate processing.
 - 9.1.1.4 Fulfil contractual and statutory obligations.
- 9.1.2 Brokers, intermediaries, and service providers
 - 9.1.2.1 Facilitate project delivery and support services with appointed intermediaries.
 - 9.1.2.2 Verify company registration, tax, B-BBEE certificates, and banking details.
 - 9.1.2.3 Process agreements, service-level records, invoices, and payments.
 - 9.1.2.4 Comply with applicable regulatory frameworks.
- 9.1.3 Suppliers and contractors
 - 9.1.3.1 Procure services, systems, and operational support.
 - 9.1.3.2 Verify registration, tax, safety files, and payment details.
 - 9.1.3.3 Process contracts, orders, deliverables, invoices, and payments.
 - 9.1.3.4 Maintain records for audit, compliance, and performance.
- 9.1.4 Employees
 - 9.1.4.1 Draft and maintain employment contracts and personnel records.
 - 9.1.4.2 Manage payroll, salaries, UIF, PAYE, retirement fund contributions, and benefits.
 - 9.1.4.3 Process leave, timesheets, training, licenses, and certifications.
 - 9.1.4.4 Record disciplinary proceedings, grievances, and performance management.
 - 9.1.4.5 Maintain health and safety records, medical certificates, incident reports, and surveillance results where required.
- 9.1.5 Job applicants
 - 9.1.5.1 Receive and evaluate applications for vacancies.
 - 9.1.5.2 Conduct shortlisting, interviews, and assessments.
 - 9.1.5.3 Verify qualifications, references, and background information.
 - 9.1.5.4 Make recruitment and appointment decisions.
 - 9.1.5.5 Retain recruitment records in accordance with labour legislation.
- 9.1.6 Operators acting on our behalf
 - 9.1.6.1 Ensure operators act only on our written instructions in terms of POPIA.



T: 012 807 0383 | E: info@ecoe.co.za | W: www.ecoe.co.za
 A: 472 Botterklapper Street, Block@Nature, Block B, Die Wilgers, Pretoria East, 0184

	Standard Website Privacy and Cookies Policy	Classification
		Public
		Document Type
		Privacy Policy
		Version / Date
		1.0 / 30.09.2025
		Page Number
		Page 11 of 19

- 9.1.6.2 Maintain operator agreements and service-level records.
- 9.1.6.3 Enable delivery of contracted services such as secure hosting, IT support, or administration.
- 9.1.6.4 Verify security controls and legal compliance.
- 9.1.7 Visitors, physical and digital
 - 9.1.7.1 Record access details for security and health and safety.
 - 9.1.7.2 Maintain visitor registers and process CCTV footage for security and incident investigations.
 - 9.1.7.3 For website visitors, process online identifiers, IP addresses, cookies, and portal logins to secure systems and provide services.
- 9.1.8 Insurance and risk
 - 9.1.8.1 Underwrite liability or assurance cover where required.
 - 9.1.8.2 Process and administer insurance claims related to operational risks.
 - 9.1.8.3 Share relevant information with insurers to comply with policy terms.
- 9.1.9 Legal, compliance, and reporting
 - 9.1.9.1 Comply with statutory reporting duties under environmental, labour, tax, and companies legislation.
 - 9.1.9.2 Respond to lawful requests from regulators, courts, or law enforcement.
 - 9.1.9.3 Maintain audit, risk management, and governance processes.

10. RETAIN RECORDS FOR HISTORICAL, STATISTICAL, AND RESEARCH PURPOSES

10.1 Eco Elementum Group processes and retains personal information for business purposes linked to project delivery, compliance, and stakeholder management. We use your information for the following reasons:

- 10.1.1 Process and record project activities, engagements, and outcomes for accurate reference.
- 10.1.2 Communicate with clients, stakeholders, suppliers, and regulators on submissions, outcomes, documentation, and payments.
- 10.1.3 Comply with legislative and regulatory requirements, including environmental, companies, labour, tax, and B-BBEE frameworks.
- 10.1.4 Conduct lawful statistical and research analysis on project trends and service outcomes, with de-identification where feasible.
- 10.1.5 Retain accurate historical records to support dispute resolution, legal proceedings, or audits.
- 10.1.6 Improve processes, digital submission systems, and support services using feedback.
- 10.1.7 Process and retain invoices, payments, proof of payment, supplier account records, and reconciliations.
- 10.1.8 Generate and issue payroll records, payslips, employee tax certificates, and HR documentation.
- 10.1.9 Verify identities and credentials for fraud prevention and security.
- 10.1.10 Administer insurance, indemnity, and liability processes.
- 10.1.11 Respond to enquiries, complaints, and service requests.
- 10.1.12 Assess supplier or client compliance and creditworthiness where relevant.



T: 012 807 0383 | E: info@ecoe.co.za | W: www.ecoe.co.za
A: 472 Botterklapper Street, Block@Nature, Block B, Die Wilgers, Pretoria East, 0184

	Standard Website Privacy and Cookies Policy	Classification
		Public
		Document Type
		Privacy Policy
		Version / Date
		1.0 / 30.09.2025
		Page Number
		Page 12 of 19

10.1.13 Keep lawful historical, statistical, and research records related to project trends, financial performance, employee compliance, and operations.

11. HOW WE USE YOUR PERSONAL INFORMATION FOR MARKETING

11.1 Eco Elementum Group will use personal information for direct marketing only in full compliance with section 69 of POPIA.

- 11.1.1 Existing clients and stakeholders. We market services that are the same as or similar to previous engagements. Each message includes a clear opt-out.
- 11.1.2 Prospective clients. We send electronic marketing only with prior consent.
- 11.1.3 Channels. In person, telephone, post, SMS, or email.
- 11.1.4 Transparency. Every communication clearly identifies the sending Eco Elementum entity.
- 11.1.5 Right to object. You request at any time that we stop marketing. We action this immediately.
- 11.1.6 Third-party marketing. We do not share personal information for others' marketing. Joint promotions run only with prior consent.
- 11.1.7 Record-keeping. We keep a record of your marketing preferences and consent history.

12. WHEN HOW AND WITH WHOM WE SHARE YOUR PERSONAL INFORMATION?

12.1 Eco Elementum Group shares personal information only when one or more of the following apply:

- 12.1.1 if you have consented to this.
 - 12.1.1.1 We share your personal information if you authorise us to do so. For example, you authorise sharing with a client, principal contractor, consultant, or regulator to support a project requirement.
- 12.1.2 To perform a contract with you:
 - 12.1.2.1 We share project or service details with partners, laboratories, surveyors, or specialist subcontractors to deliver the service.
 - 12.1.2.2 We provide banking details to authorised financial institutions to process payments.
 - 12.1.2.3 We share information with contracted administrators or IT providers who support secure portals and processing systems.
- 12.1.3 Where required by law:
 - 12.1.3.1 We disclose information to competent authorities for permits and compliance.
 - 12.1.3.2 We disclose information to the Information Regulator for POPIA compliance or to labour and HSE bodies for statutory duties.
 - 12.1.3.3 We disclose financial records required in terms of tax or companies legislation.
- 12.1.4 To protect legitimate interests:
 - 12.1.4.1 We share personal information with legal representatives when enforcing agreements, handling disputes, or defending legal claims.



T: 012 807 0383 | E: info@ecoe.co.za | W: www.ecoe.co.za
 A: 472 Botterklapper Street, Block@Nature, Block B, Die Wilgers, Pretoria East, 0184

	Standard Website Privacy and Cookies Policy	Classification
		Public
		Document Type
		Privacy Policy
		Version / Date
		1.0 / 30.09.2025
		Page Number
		Page 13 of 19

12.1.4.2 We disclose information to insurers when assessing or processing liability matters.

12.1.4.3 We share limited data with IT security providers and fraud prevention agencies to protect systems.

12.2 In every case, Eco Elementum Group shares personal information only with trusted third parties who are contractually bound to protect the information and to use it strictly for the stated purpose.

13.UNDER WHAT CIRCUMSTANCES WILL WE TRANSFER YOUR INFORMATION TO OTHER COUNTRIES?

13.1 Eco Elementum Group transfers personal information to third parties outside South Africa only in the following circumstances:

13.1.1 Adequate protection:

The receiving country provides adequate safeguards, or the recipient signs a contract requiring protection at the same or a higher standard than POPIA.

13.1.2 Contractual necessity:

The transfer is required to conclude or perform a contract in your interest. Examples include secure hosting, specialist consulting, or international payment processing that supports project delivery.

13.1.3 Your consent:

You provide explicit permission to share information with a foreign recipient involved in the project or service.

13.1.4 Practical necessity:

It is not reasonably practical to obtain consent beforehand and the transfer is in your interest, such as urgent system recovery or fraud checks.

13.2 All cross-border transfers take place within legal safeguards. Wherever possible, the foreign recipient agrees in writing to apply protection equal to or stronger than POPIA.

14.HOW WE SECURE YOUR PERSONAL INFORMATION

14.1We implement appropriate and reasonable technical and organisational measures in line with POPIA and industry standards, including:

14.1.1 System security and monitoring. Role-based access, multi-factor authentication, firewalls, encryption, and logging.

14.1.2 Secure storage of electronic and physical records.

14.1.3 Physical access controls for buildings, offices, and records.

14.1.4 Destruction and deletion per retention schedules and law.

14.1.5 Employee POPIA and security training.

14.1.6 Operator and supplier security obligations under contract.



T: 012 807 0383 | E: info@ecoe.co.za | W: www.ecoe.co.za
A: 472 Botterklapper Street, Block@Nature, Block B, Die Wilgers, Pretoria East, 0184

	Standard Website Privacy and Cookies Policy	Classification
		Public
		Document Type
		Privacy Policy
		Version / Date
		1.0 / 30.09.2025
		Page Number
		Page 14 of 19

14.1.7 Compliance reviews, audits, and testing.

15. HOW LONG DO WE KEEP YOUR PERSONAL INFORMATION?

15.1 Eco Elementum Group retains personal information only for as long as lawfully required and relevant to our operations.

- 15.1.1 Legal requirements. Financial, tax, and statutory records are retained for periods prescribed by South African law, generally 5 to 7 years or longer where required.
- 15.1.2 Contractual obligations. We keep personal information for the duration of the contract and for any additional period needed to resolve disputes, enforce agreements, or meet obligations.
- 15.1.3 Consent-based retention. Where you have given consent, for example to receive marketing, we retain information until you withdraw consent.
- 15.1.4 Business purposes. We retain records as needed to deliver services, process payments, and maintain accurate histories.
- 15.1.5 Statistical and research use. We keep de-identified information for lawful historical, statistical, and research purposes.
- 15.1.6 Industry codes and best practices. Where applicable, we retain records in line with prescribed periods for reporting, risk, and audit.
- 15.1.7 Employment-related records. Employee, payroll, and health and safety records are kept per labour and HSE laws. Recruitment records for unsuccessful applicants are retained for up to 12 months unless a longer period is required by law or retained with consent.

15.2 We may keep your personal information even if you no longer have a relationship with us, for the historical data that may be required by your employer or employee.

16. OUR COOKIE POLICY

16.1 USE OF COOKIES ON THE ECO ELEMENTUM WEBSITE

16.1.1 Eco Elementum Group uses cookies on www.ecoelementum.co.za to support functionality and improve your browsing experience. Cookies are small files placed on your device when you visit our website. These recognise your device, remember preferences, and help you engage with our online platforms. We use cookies for the following purposes:

16.1.1.1 Portal access:

Cookies keep you logged in to secure portals during a session.

16.1.1.2 Forms and submissions:

Cookies keep sessions active during online submissions and validate inputs.

16.1.1.3 User preferences:

Cookies remember language and region so content displays correctly.



T: 012 807 0383 | E: info@ecoe.co.za | W: www.ecoe.co.za
A: 472 Botterklapper Street, Block@Nature, Block B, Die Wilgers, Pretoria East, 0184

	Standard Website Privacy and Cookies Policy	Classification
		Public
		Document Type
		Privacy Policy
		Version / Date
		1.0 / 30.09.2025
		Page Number
		Page 15 of 19

16.1.1.4 Website analytics:

Cookies help us understand which pages and documents are used most often.

16.1.1.5 Security and fraud prevention:

Cookies help detect suspicious activity and protect secure areas.

16.1.2 By using our website, you consent to our use of cookies. You disable or block cookies in your browser settings. If you block cookies, certain functions will not work properly, including submissions, document downloads, or portal navigation. We do not use cookies to collect sensitive personal information.

16.2 YOUR RIGHT OF ACCESS, CORRECTION, AND DELETION

16.2.1 You have the right to request access to personal information that Eco Elementum Group holds about you. This includes:

16.2.1.1 Confirmation that we hold your personal information.

16.2.1.2 A copy or description of the record containing your personal information.

16.2.1.3 The identity or categories of third parties who have had access to your personal information.

16.2.2 We respond within a reasonable time. A reasonable fee might apply for copies or for information relating to third-party disclosures. The law might limit access to certain information.

16.2.3 You have the right to request correction or deletion of your personal information if it is inaccurate, irrelevant, excessive, out of date, incomplete, or misleading, obtained unlawfully, or no longer authorised for us to keep. Requests must be made in writing to the Information Officer. Updates can take up to 15 business days to reflect. Where law requires retention, deletion will not apply.

16.3 YOUR RIGHT TO OBJECT, WITHDRAW CONSENT, AND LODGE A COMPLAINT

16.3.1 You object, on reasonable grounds, to the processing of your personal information by Eco Elementum Group. We might not give effect to an objection where processing is required or permitted by law, where you have provided consent and processing aligns with that consent, or where processing is necessary to conclude or perform a contract.

16.3.2 You withdraw consent at any time. We will explain the consequences. Objections and withdrawals must be made in writing to the Information Officer. You also have the right to lodge a complaint with the Information Regulator.

17. THE CONTACT DETAILS FOR THE INFORMATION REGULATOR ARE AS FOLLOWS:

Email: POPIAComplaints@infoeregulator.org.za
Postal Address: P.O. Box 31533, Braamfontein, Johannesburg, 2017



T: 012 807 0383 | **E:** info@ecoe.co.za | **W:** www.ecoe.co.za
A: 472 Botterklapper Street, Block@Nature, Block B, Die Wilgers, Pretoria East, 0184

	Standard Website Privacy and Cookies Policy	Classification
		Public
		Document Type
		Privacy Policy
		Version / Date
		1.0 / 30.09.2025
		Page Number
		Page 16 of 19

Physical Address: Woodmead North Office Park, 54 Maxwell Drive, Woodmead, Johannesburg.
Website: www.inforegulator.org.za

18.HOW CAN YOU GET IN TOUCH WITH US?

For any queries in relation to this letter or our processing of your persona information in general, you can contact our Information Officer and/or Deputy Information Officer at the following details:

Eco Elementum Investments (Pty) Ltd

Information Officer

Name	Vernon Siemelink
Contact number	+27 12 807 0383
Email address	info@ecoe.co.za

Deputy Information Officer

Name	Christiaan de Haast
Contact number	+27 12 807 0383
Email address	info@ecoe.co.za

Eco Elementum (Pty) Ltd

Information Officer

Name	Henno Engelbrecht
Contact number	+27 12 807 0383
Email address	info@ecoe.co.za

Deputy Information Officer

Name	Christiaan de Haast
Contact number	+27 12 807 0383
Email address	info@ecoe.co.za

Eco Elementum Engineering (Pty) Ltd



T: 012 807 0383 | E: info@ecoe.co.za | W: www.ecoe.co.za
A: 472 Botterklapper Street, Block@Nature, Block B, Die Wilgers, Pretoria East, 0184

	Standard Website Privacy and Cookies Policy	Classification
		Public
		Document Type
		Privacy Policy
		Version / Date
		1.0 / 30.09.2025
		Page Number
		Page 17 of 19

Information Officer

Name	Chris Fourie
Contact number	+27 12 807 0383
Email address	info@ecoe.co.za

Deputy Information Officer

Name	Christiaan de Haast
Contact number	+27 12 807 0383
Email address	info@ecoe.co.za

Eco Elementum Intelligence (Pty) Ltd

Information Officer

Name	Henno Engelbrecht
Contact number	+27 12 807 0383
Email address	info@ecoe.co.za

Deputy Information Officer

Name	Christiaan de Haast
Contact number	+27 12 807 0383
Email address	info@ecoe.co.za

EcoE Sciences (Pty) Ltd

Information Officer

Name	Henno Engelbrecht
Contact number	+27 12 807 0383
Email address	info@ecoe.co.za

Deputy Information Officer



T: 012 807 0383 | E: info@ecoe.co.za | W: www.ecoe.co.za
A: 472 Botterklapper Street, Block@Nature, Block B, Die Wilgers, Pretoria East, 0184

	Standard Website Privacy and Cookies Policy	Classification
		Public
		Document Type
		Privacy Policy
		Version / Date
		1.0 / 30.09.2025
		Page Number
		Page 18 of 19

Name	Christiaan de Haast
Contact number	+27 12 807 0383
Email address	info@ecoe.co.za

Eco Elementum Construction (Pty) Ltd

Information Officer

Name	Kayle Whitehead
Contact number	+27 12 807 0383
Email address	info@ecoe.co.za

Deputy Information Officer

Name	Christiaan de Haast
Contact number	+27 12 807 0383
Email address	info@ecoe.co.za

Eco Elementum Foundation NPC

Information Officer

Name	Vernon Siemelink
Contact number	+27 12 807 0383
Email address	info@ecoe.co.za

Deputy Information Officer

Name	Christiaan de Haast
Contact number	+27 12 807 0383
Email address	info@ecoe.co.za

Head Office

Postal address	PostNet Suite 252
----------------	-------------------



T: 012 807 0383 | E: info@ecoe.co.za | W: www.ecoe.co.za
A: 472 Botterklapper Street, Block@Nature, Block B, Die Wilgers, Pretoria East, 0184

	Standard Website Privacy and Cookies Policy	Classification
		Public
		Document Type
		Privacy Policy
		Version / Date
		1.0 / 30.09.2025
		Page Number
		Page 19 of 19

	Private Bag X025 Lynnwood Ridge
Physical address	472 Botterklapper Street Block@Nature Block B Die Wilgers Gauteng 0184
Contact number	+27 12 807 0383
Email	info@ecoe.co.za
Website	https://www.ecoelementum.co.za/



T: 012 807 0383 | E: info@ecoe.co.za | W: www.ecoe.co.za
A: 472 Botterklapper Street, Block@Nature, Block B, Die Wilgers, Pretoria East, 0184