

FILE BY FIFO - PRIVACY POLICY

Effective Date: _____

Last Updated: _____

1. INTRODUCTION

FIFO Solutions (Pty) Ltd (Registration No: 2026/071559/07) ("FIFO", "we", "us", "our") is committed to protecting the privacy of individuals whose personal information is processed through File by FIFO ("File", "the Service").

This Privacy Policy explains how we collect, use, store, and protect personal information in compliance with the Protection of Personal Information Act, 2013 ("POPIA") and other applicable South African laws.

2. WHO WE ARE

Responsible Party: FIFO Technologies (Pty) Ltd Registration Number: _____

Information Officer: Name: _____ Email: privacy@fifo.systems Phone: _____

Contact for Privacy Queries: Email: privacy@fifo.systems Website: <https://file.fifo.systems>

3. SCOPE OF THIS POLICY

This Privacy Policy applies to: - Organizations ("Clients") that subscribe to File - Employees and individuals whose data is processed within File ("Data Subjects") - Visitors to our website and marketing communications

4. OUR ROLE UNDER POPIA

4.1 As Operator

When processing personal information on behalf of Clients (employers), FIFO acts as an **Operator** under POPIA. The Client remains the **Responsible Party** for their employee data.

4.2 As Responsible Party

For Client account information and direct marketing, FIFO acts as the **Responsible Party**.

5. PERSONAL INFORMATION WE PROCESS

5.1 Client Account Information

When you subscribe to File, we collect: - Organization name and registration details - Contact person name, email, and phone number - Billing address and payment information - Account credentials

5.2 Employee Data (Processed on Behalf of Clients)

Clients may upload or input the following employee information: - Names and surnames - ID numbers or passport numbers - Contact details (phone, email, address) - Employment details (position, department, start date) - Manager assignments - Disciplinary records and warnings - Attendance and absence records - Meeting notes and counselling records - Signatures (digital) - Audio recordings (if enabled by Client)

5.3 Technical Information

We automatically collect: - IP addresses - Browser type and version - Device information - Access times and dates - Pages viewed and features used - Error logs

6. PURPOSE OF PROCESSING

6.1 Client Account Information

We process Client information to: - Provide access to the Service - Manage subscriptions and billing - Communicate service updates and support - Comply with legal obligations

Legal Basis: Contract performance, legitimate interest, legal obligation

6.2 Employee Data

Clients use File to: - Manage employee records - Document disciplinary processes - Track absences and meetings - Generate HR documentation - Comply with employment law requirements

Legal Basis: Contract between Client and FIFO; Client's lawful employment relationship with employees

6.3 Technical Information

We process technical data to: - Maintain and secure the Service - Analyze usage and improve features - Troubleshoot issues

Legal Basis: Legitimate interest

7. LAWFUL BASIS FOR PROCESSING

Under POPIA Section 11, we process personal information based on:

Category	Lawful Basis
Client account data	Contract performance
Employee data (via Client)	Client's legal obligations as employer
Technical/usage data	Legitimate interest
Marketing (direct)	Consent (opt-in)

8. DATA SHARING AND DISCLOSURE

8.1 We Do NOT Sell Data

We do not sell, rent, or trade personal information to third parties.

8.2 Service Providers

We share data with trusted service providers who assist us in operating the Service:

Provider	Purpose	Location
Google Cloud / Firebase	Cloud hosting and database	International (US)
Payment processor	Subscription billing	South Africa
Email service	Transactional emails	International

All service providers are bound by data processing agreements and confidentiality obligations.

8.3 Legal Requirements

We may disclose information when required by: - Court order or legal process - Government authority with lawful authority - To protect our rights, safety, or property

8.4 Business Transfer

If FIFO is acquired or merged, personal information may be transferred to the successor entity, subject to the same privacy protections.

9. INTERNATIONAL DATA TRANSFERS

9.1 Cloud Infrastructure

File is hosted on Google Cloud / Firebase infrastructure, which may store data in data centers outside South Africa.

9.2 POPIA Compliance

We ensure international transfers comply with POPIA Section 72 by: - Using providers with adequate data protection measures - Implementing contractual safeguards - Ensuring encryption in transit and at rest

10. DATA RETENTION

10.1 Active Accounts

We retain data for as long as the Client's subscription is active.

10.2 After Termination

- Client data is retained for **30 days** after termination to allow export
- After 30 days, data is permanently deleted
- Backups are purged within **90 days**

10.3 Legal Requirements

We may retain data longer if required by law or to resolve disputes.

10.4 Anonymized Data

We may retain anonymized, aggregated data indefinitely for analytics purposes.

11. DATA SECURITY

We implement appropriate technical and organizational measures to protect personal information:

11.1 Technical Measures

- Encryption in transit (TLS/SSL)
- Encryption at rest
- Secure authentication (password hashing)
- Regular security updates
- Firewall and intrusion detection
- Access logging and monitoring

11.2 Organizational Measures

- Access limited to authorized personnel
- Confidentiality agreements
- Security awareness training
- Incident response procedures

11.3 Breach Notification

In the event of a data breach, we will: - Notify affected Clients within 72 hours - Notify the Information Regulator as required by POPIA - Take immediate remedial action

12. YOUR RIGHTS UNDER POPIA

12.1 For Clients

As a Client, you have the right to: - **Access** your account information - **Correct** inaccurate information - **Delete** your account and data - **Export** your data in a usable format - **Object** to processing for direct marketing - **Withdraw consent** where applicable

12.2 For Employees (Data Subjects)

If your employer uses File, you have the right to: - **Request access** to your personal information (via your employer) - **Request correction** of inaccurate data (via your employer) - **Object** to processing in certain circumstances - **Lodge a complaint** with the Information Regulator

Note: Employee requests should be directed to your employer (the Client), who is the Responsible Party for your data. We will assist Clients in fulfilling these requests.

12.3 How to Exercise Rights

To exercise your rights, contact: - **Clients:** privacy@fifosystems.com - **Employees:** Contact your employer's HR department

13. CHILDREN'S PRIVACY

File is designed for business use and is not intended for processing information about children (under 18) except as part of legitimate employment records (e.g., minor employees with parental consent, dependents for benefits purposes).

14. COOKIES AND TRACKING

14.1 Essential Cookies

We use essential cookies for: - User authentication - Session management - Security features

14.2 Analytics

We may use analytics services to understand usage patterns. This data is aggregated and anonymized.

14.3 No Third-Party Advertising

We do not use advertising cookies or tracking pixels.

15. MARKETING COMMUNICATIONS

15.1 Opt-In

We only send marketing communications to those who have opted in.

15.2 Unsubscribe

You may unsubscribe from marketing at any time by: - Clicking the unsubscribe link in any marketing email - Contacting us at privacy@fifo.systems

15.3 Service Communications

We will continue to send essential service communications (e.g., billing, security alerts) even if you unsubscribe from marketing.

16. CHANGES TO THIS POLICY

We may update this Privacy Policy from time to time. We will notify you of material changes by: - Email notification to Clients - In-app notification - Posting the updated policy on our website

Continued use of the Service after changes constitutes acceptance of the updated policy.

17. COMPLAINTS

17.1 Contact Us First

If you have concerns about how we handle personal information, please contact us at privacy@fifo.systems. We will investigate and respond within a reasonable time.

17.2 Information Regulator

If you are not satisfied with our response, you have the right to lodge a complaint with:

The Information Regulator (South Africa) - Email: inforeg@justice.gov.za - Website: <https://www.justice.gov.za/inforeg/> - Phone: 012 406 4818

18. CONTACT US

For any questions about this Privacy Policy or our data practices:

FIFO Technologies (Pty) Ltd

Information Officer: _____

Email: privacy@fifo.systems

Physical Address: _____

Phone: _____

19. ACKNOWLEDGMENT

By using File, you acknowledge that you have read and understood this Privacy Policy.

Version: 1.0

Effective: _____

APPENDIX A: PROCESSING ACTIVITIES SUMMARY

Data Category	Purpose	Legal Basis	Retention
Client account info	Service delivery	Contract	Duration of subscription + 30 days
Employee records	HR management	Client's employment relationship	As directed by Client
Disciplinary records	Legal compliance	Client's legal obligations	As directed by Client
Usage/technical data	Service improvement	Legitimate interest	12 months
Marketing contacts	Promotional communications	Consent	Until withdrawal