

Privacy Notice

POPIA privacy notice for Duewarden, operated by TECBINO (Pty) Ltd

Entity	TECBINO (Pty) Ltd
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Status	Effective

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1. Who is responsible for your information

TECBINO (Pty) Ltd (registration number 2025/063187/07) operates Duewarden. TECBINO is the responsible party for personal information where it decides why and how that information is processed, including website, account, subscription, support, security and business-administration information.

For personal information that a customer places in its Duewarden workspace and for which that customer decides the purpose and means of processing, the customer is generally the responsible party and TECBINO generally acts as its operator to provide the Service.

Contact	Details
Information Officer	Luigi Di Leo, Director
Privacy / PAIA / data requests	support_duewarden@tecbino.co.za
Physical address	26 Leslie Avenue, Sandton, Gauteng, 2191, South Africa
Website	https://www.duewarden.tecbino.co.za
Telephone	+27 61 536 4024

2. Personal information we process

Category	Examples	Why we use it
Account and contact data	Name, work email, organisation, role, user / workspace identifiers	Create and administer accounts; communicate about the Service.

Category	Examples	Why we use it
Authentication and security data	Login timestamps, IP addresses, session / device metadata, security events	Authenticate users, protect accounts, investigate abuse and security incidents.
Workspace / Customer Data	Equipment and asset records, calibration / service dates, certificate or document references, notes, workflow information, and any names or contact details the customer chooses to include	Provide Duewarden functionality on the customer's instructions.
Subscription and billing data	Plan, billing contact, invoice / transaction reference, payment status; payment-card data is handled by Paystack	Process subscriptions, payments, refunds, accounting and fraud controls.
Support and correspondence	Emails, support requests, diagnostic information voluntarily supplied	Respond to requests, troubleshoot and maintain service quality.
Technical service data	Application logs, error information, configuration and operational metadata	Operate, secure and improve reliability.

Duewarden does not currently use a dedicated analytics or customer-support tracking platform. If optional analytics, advertising or session-replay tooling is introduced, this Notice and any required cookie choices must be updated before the tool is enabled.

3. How we collect information

- Directly from users, customer administrators and customer organisations during sign-up, subscription, use and support.
- Automatically from Duewarden, authentication systems and security / technical logs when the Service is used.
- From Paystack in relation to subscription payment status and transaction references.
- From business contacts, suppliers and professional advisers where relevant to operating TECBINO.

4. Purposes and legal grounds under POPIA

TECBINO processes personal information only where a POPIA ground permits the processing. Depending on the activity, this may include consent; processing necessary to conclude or perform a contract; compliance with a legal obligation; protection of a legitimate interest of the data subject; or processing necessary for TECBINO's or a third party's legitimate interests, where those interests are not overridden by the data subject's rights.

- Provide, administer and secure Duewarden and customer workspaces.
- Authenticate users and enforce account permissions.

- Process subscriptions, payments, refunds, invoices and accounting records.
- Send service, security, billing and support communications.
- Detect and respond to fraud, abuse, technical faults and security compromises.
- Comply with tax, company, privacy, access-to-information and other legal duties.
- Defend or exercise legal rights and resolve disputes.
- Improve reliability and functionality using appropriately minimised technical information.

5. Operators and recipients

Recipient / operator	Role	Information involved
Amazon Web Services (AWS)	Cloud hosting, application and authentication infrastructure	Account, workspace, authentication, logs and technical service data.
Paystack South Africa and payment ecosystem	Payment processing, recurring billing, refunds, fraud / financial compliance	Billing and transaction information; payment details are entered into / processed by Paystack.
Email infrastructure	Service and support communications	Email address, message content and delivery metadata. Provider to be confirmed in internal operator register.
Professional advisers / accountants	Accounting, tax, legal and compliance support	Only the information reasonably necessary for the relevant professional service.
Authorities / courts	Where disclosure is required or authorised by law	Information specified by the lawful request or legal process.

TECBINO requires operators to process personal information under appropriate written terms and security obligations where POPIA requires this. Operators may use their own subprocessors subject to their contracts and privacy obligations.

6. Processing outside South Africa

Duewarden application and authentication infrastructure is hosted in AWS region eu-central-1 in Frankfurt, Germany. Accordingly, account, authentication, workspace and technical data may be stored or processed in Germany. Germany is subject to the European Union GDPR framework, and TECBINO also maintains contractual / operator safeguards and a transfer record for POPIA section 72 compliance.

Paystack South Africa processes payment and transaction information and may use systems and subprocessors in South Africa and other countries. As at 27 September 2026, Paystack's South African privacy material states that it uses AWS cloud infrastructure with servers in Ireland and applies contractual or other safeguards to cross-border processing.

TECBINO will not intentionally transfer personal information outside South Africa unless a POPIA section 72 condition is met. The precise service-provider and subprocessor locations can change;

TECBINO maintains the controlled operator / transfer register and will update this Notice when a change materially affects users.

7. Payment information

Payments are processed by Paystack. TECBINO does not intend to receive or store full card numbers or card security codes. Paystack collects and processes payment information under its own security, financial-services and privacy obligations. TECBINO receives transaction references, payment status and other information needed to administer the subscription and issue / reconcile business records.

8. Retention

Information	Retention approach
Active workspace data	Retained while the workspace is active and as needed to provide Duewarden.
Workspace data after closure	Scheduled for deletion or irreversible de-identification within 40 days after effective workspace closure, except information TECBINO is lawfully required or authorised to retain.
Account / authentication data	Generally kept while the account is active and through the 40-day closure period; security evidence may be retained longer where necessary to investigate or defend an incident.
Billing / tax records	Kept for the applicable statutory period. SARS guidance generally requires relevant tax records for five years from submission of the relevant return, subject to longer audit / dispute periods.
Paystack records	Paystack retains transaction and business-relationship records independently under its legal obligations; its South African privacy material currently refers to at least five years for specified records.
Support correspondence	Kept only as long as reasonably necessary to resolve the matter, maintain an appropriate business record and address legal / security issues.

Deletion from backups and disaster-recovery systems follows the configured backup lifecycle. TECBINO must configure and periodically verify the backup process so that the public 40-day workspace-deletion commitment remains accurate in practice and deleted data is not restored into active use.

9. Security

TECBINO uses technical and organisational safeguards appropriate to the nature of the information and the risks, which may include role-based access, least privilege, authentication controls, encryption in transit, secure configuration, logging and monitoring, patch and vulnerability management, backups, change control, operator due diligence, confidentiality obligations and incident response. Security controls are reviewed as the Service changes.

10. Cookies and similar technologies

Duewarden may use strictly necessary cookies or similar storage for authentication, session security, preferences and service operation. TECBINO does not currently use dedicated advertising or optional analytics tools in Duewarden. If non-essential tracking is introduced, appropriate notice and choices will be added before activation.

11. Direct marketing

Service, security and billing messages are not optional marketing. TECBINO will not treat acceptance of the Terms as blanket consent to unrelated direct marketing. If optional marketing is introduced, TECBINO will use the required consent / opt-out process and maintain preference evidence.

12. Special personal information and children

Duewarden is not designed to require special personal information or children's personal information as part of normal equipment and calibration management. Customers should not upload such information unless they have established a lawful basis and appropriate safeguards. TECBINO may restrict or remove data that creates an unacceptable legal or security risk.

13. Your POPIA rights

- Ask whether TECBINO holds personal information about you and request access, subject to POPIA / PAIA procedures.
- Request correction or deletion / destruction of information that is inaccurate, irrelevant, excessive, out of date, incomplete, misleading or unlawfully obtained / retained, where the statutory requirements are met.
- Object to processing on grounds recognised by POPIA.
- Withdraw consent where processing relies on consent, without affecting prior lawful processing.
- Complain to the Information Regulator or exercise another remedy available under law.

Send privacy, access, correction, deletion or objection requests to support_duewarden@tecbino.co.za. TECBINO may verify identity and authority before acting on a request. The Information Regulator publishes the current prescribed forms and PAIA process on its website.

14. Security compromises

If TECBINO has reasonable grounds to believe that personal information has been accessed or acquired by an unauthorised person, it will assess the incident and make notifications required by

POPIA section 22 as soon as reasonably possible, subject to any lawful delay directed by law enforcement or the Regulator.

15. Changes to this Notice

TECBINO may update this Notice when the Service, operators, processing purposes or law materially changes. The current version will be published on the Duewarden website. Material changes that materially affect users will be communicated through an appropriate channel.

16. Contact and regulator

Information Officer: Luigi Di Leo, Director

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Information Regulator (South Africa): <https://inforegulator.org.za/> | eServices:

<https://eservices.inforegulator.org.za/>