



WEBSITE PRIVACY NOTICE

Pangolin Africa NPC

Contents

- 1 Introduction
- 2 What personal information we collect and why
- 3 Voluntary and mandatory information
- 4 How we collect your personal information
- 5 Legal basis for processing
- 6 Sharing and disclosure of information
- 7 Cross-border transfers
- 8 Direct marketing
- 9 Retention of personal information
- 10 Security safeguards
- 11 Your rights as a data subject
- 12 Complaints to the Information Regulator
- 13 Changes to this privacy notice
- 14 Contact us

1 Introduction

This privacy notice explains how Pangolin Africa NPC (Pangolin Africa, we, us or our) collects and processes personal information in connection with our pangolin conservation activities. Pangolin Africa is the responsible party for the personal information described in this notice, which is intended to explain, in plain language, what personal information we collect, why we collect it, how we use and share it, and what rights you have in respect of your personal information.

We are committed to protecting your personal information in accordance with the Protection of Personal Information Act, 2013 (POPIA).

This privacy notice applies when you:

- complete our property surveys;



- visit our website (www.pangolin.africa) or engage with us through social media;
- make a donation or support our fundraising activities;
- request access to our release-site database as a conservationist, researcher or scientist;
- provide goods or services to us as a supplier or service provider;
- volunteer for or participate in our programmes or events; or
- otherwise communicate with us by email, telephone or other means.

This privacy notice also covers circumstances where we obtain personal information from publicly available sources in a lawful manner.

2 What personal information we collect and why

We collect personal information for various purposes related to our pangolin conservation mission, including building and maintaining a database of pre-approved pangolin release sites, supporting our fundraising and donor relations, engaging with suppliers and service providers, and collaborating with conservationists and researchers.

The table below sets out the categories of personal information we collect, by data subject category, together with the purposes for collection and the sources.



CATEGORY OF DATA SUBJECT	TYPES OF PERSONAL INFORMATION	PURPOSE AND SOURCES
Property survey respondents (property owners, managers and their representatives)	• Contact details (name, email, telephone, job title, organisation). • Property details (name, location, size, land registration). • Land use and habitat information. • Wildlife and conservation activity information. • Mapping and boundary files.	Purpose: • To build and maintain a database of pre-approved pangolin release sites. • To assess property suitability and support applications to the Department of Forestry, Fisheries and the Environment. • To communicate with you about your submission and the release-site programme. Source: Directly from you when you complete our online survey.
Conservationists, researchers, scientists and NGOs	• Contact details and organisational affiliation. • Details of data access request.	Purpose: • To verify affiliation with a recognised conservation organisation. • To assess and process data access requests. • To share release-site information for legitimate conservation purposes. Source: Directly from you when you request access to our database via our website or contact us.
Donors and supporters	• Contact details. • Donation and payment information. • Communication preferences.	Purpose: • To process and acknowledge donations. • To issue receipts and tax documentation where applicable. • To communicate with you about our programmes. • To maintain donor records. Source: Directly from you when you make a donation or sign up to receive communications.



CATEGORY OF DATA SUBJECT	TYPES OF PERSONAL INFORMATION	PURPOSE AND SOURCES
Suppliers and service providers	• Organisation details (name, registration, address). • Contact details of representatives and personnel. • Banking and payment information. • Tax-related information. • BEE status where relevant to procurement. • Contractual and correspondence records.	Purpose: • To engage suppliers and service providers, including to enter into and/or perform in terms of any contractual undertakings. • To process payments and manage accounts. • To maintain accurate financial and operational records. Source: Directly from you or your organisation when you engage with us.
Website visitors and general enquiries	• Contact details. • Content of enquiries or correspondence. • Technical information collected automatically when you visit our website (such as IP address, browser type, pages visited) where cookies or analytics tools are used. • Social media identifiers where you engage with us through those platforms.	Purpose: • To respond to your enquiries. • To communicate with you about our work. • To improve our website and services. Source: Directly from you when you contact us or interact with our website.
Volunteers and event participants	• Contact details and emergency contacts. • Relevant skills or qualifications. • Attendance and participation records. • Photographs, videos or other visual recordings at events.	Purpose: • To coordinate volunteer activities and events. • To communicate with you about opportunities and logistics. • To ensure health and safety. • To publish photographs or recordings on our website, social media or marketing materials. Source: Directly from you when you volunteer or register for an event; photographs or recordings taken at events.



We do not generally collect special personal information (such as health, biometric, religious or political data) through our interactions with you, except where necessary for specific purposes such as BEE verification or compliance with legal requirements, in which case we process such information only where permitted by law.

Where we collect personal information relating to children, we do so only with the consent of a competent person (such as a parent or guardian) or under another applicable legal authorisation, and we take appropriate measures to protect the best interests of the child.

We also recognise that property location data carries sensitivity from a conservation-security perspective and we treat it with appropriate care.

3 Voluntary and mandatory information

Providing your personal information to us is generally voluntary. However, depending on how you engage with us, certain information may be necessary:

- **Property survey respondents:** Certain survey fields are required in order for us to assess your property as a candidate release site. These include your province, property name, contact details and Google Maps location. If you choose not to provide the required fields, we will be unable to include your property in our release-site database.
- **Donors:** If you make a donation, we need your contact details to process and acknowledge your contribution. Payment information is required to complete the transaction.
- **Suppliers:** If you provide goods or services to us, we need your banking and tax details to process payments.
- **General:** You may browse our website without providing any personal information.

4 How we collect your personal information

We collect personal information directly from you through various channels, including:

- our online "A Place for Pangolins" property survey;



- our website contact forms and email correspondence;
- donation and payment processes;
- telephone and face-to-face communications;
- data access request forms on our website; and
- supplier onboarding and invoicing processes.

Where we obtain information from sources other than directly from you, we will do so in accordance with POPIA.

5 Legal basis for processing

We rely on the following lawful grounds under POPIA to process your personal information:

- **Consent:** We rely on your consent for specific processing activities, including sending you direct marketing communications and completing the property survey.
- **Necessary for a contract:** Processing may be necessary for the performance of a contract to which you are a party, or for steps taken at your request before entering into a contract. This includes processing in connection with supplier and service provider agreements, donation arrangements, data access agreements with researchers, and the Terms and Conditions governing participation in our programmes.
- **Legitimate interest:** Processing may be necessary for our legitimate interests or those of a third party, provided your rights do not outweigh those interests. Our legitimate interests include, but are not limited to, advancing pangolin conservation and rewilding, maintaining and sharing the release-site database with verified conservation professionals, managing our operations and relationships, and improving our programmes and services.
- **Legal obligation:** Processing may be necessary to comply with a legal obligation to which we are subject, including tax, accounting and reporting requirements.

6 Sharing and disclosure of information

We may share your personal information with the following categories of recipients:



- **Conservationists, scientists, researchers and NGOs:** We may share information with conservation organisations, rehabilitation centres, veterinary professionals, researchers and scientists involved in pangolin conservation, rescue, rehabilitation and release. This includes sharing release-site data with verified conservation professionals who request access to our database (subject to verification of affiliation and governed by our Terms and Conditions), as well as coordination with partners involved in pangolin rescue and release operations.
- **Government and regulatory authorities:** We may share personal information with relevant authorities where necessary for pangolin conservation and compliance purposes. This includes the Department of Forestry, Fisheries and the Environment (DFFE) and provincial conservation authorities as part of the formal approval process for pangolin releases, as well as law enforcement agencies where relevant to combating wildlife crime.
- **Service providers:** We use third-party service providers to support our operations, including survey and data hosting providers, payment processors, and other cloud-based tools. These providers are under contractual obligations that require appropriate security measures and limit processing to agreed purposes.
- **Professional advisers:** We may share personal information with professional advisers (such as legal, accounting or audit professionals) where necessary for their engagement.
- **Banking and payment providers:** We share payment-related information with banks and payment service providers to process donations, supplier payments and other transactions.

We do not disclose personal information for purposes unrelated to our conservation mission and legitimate operational needs, except where required by law or a court order.

7 Cross-border transfers

We may process personal information outside South Africa, including through the use of cloud-based service providers whose servers may be located in other countries. Where we do so, we will ensure that such transfers comply with the requirements of POPIA.

8 Direct marketing



We will only send you direct marketing communications (such as fundraising appeals, newsletters or information about our programmes) if you have specifically opted in by providing your consent. Donors and other supporters may be invited to opt in to receive communications at the point of engagement.

You may withdraw your marketing consent or opt out of direct marketing at any time by contacting us at info@pangolin.africa or by following any unsubscribe mechanism in our communications. Withdrawal of marketing consent will not affect the lawfulness of any prior marketing communications sent to you while consent was in place, nor will it affect our ability to continue processing your personal information for non-marketing purposes.

9 Retention of personal information

We retain personal information only for as long as necessary to fulfil the purposes for which it was collected, or as required by applicable law. This includes retaining records to comply with tax and accounting requirements, to manage ongoing relationships, and for purposes of proof. When personal information is no longer needed, we will securely destroy it or de-identify it in accordance with POPIA.

10 Security safeguards

We implement appropriate technical and organisational measures to protect your personal information against unauthorised access, loss, damage or destruction. These include:

- hosting data on secure platforms, with access limited to authorised personnel only;
- password complexity requirements and regular credential management;
- logical access controls that restrict database access on a need-to-know basis;
- confidentiality obligations on all staff, directors and operators who have access to the database; and
- verification and access-control procedures for third-party conservation professionals requesting database access.

We require our service providers to maintain suitable safeguards and to notify us without undue delay in the event of a data breach incident.



11 Your rights as a data subject

Under POPIA, you have the following rights in relation to your personal information:

- **Right of access:** You may request confirmation of whether we hold personal information about you, request access to that information or a description of it, and request information about the third parties to whom we have disclosed your personal information.
- **Right to correction or deletion:** You may request that we correct personal information that is inaccurate, irrelevant, excessive, out of date, incomplete, misleading or unlawfully obtained. You may also request deletion in appropriate circumstances.
- **Right to object:** You may object, on reasonable grounds, to the processing of your personal information, unless processing is permitted by law. You may object to direct marketing at any time.
- **Right to withdraw consent:** Where processing is based on consent, you may withdraw that consent at any time. Withdrawal will not affect the lawfulness of processing that occurred before withdrawal.

To exercise any of these rights, please contact our Information Officer as set out below. We may request proof of identity to verify your request.

12 Complaints to the Information Regulator

We encourage you to raise any privacy concerns with us directly so that we can address them promptly. However, you have the right to lodge a complaint with the Information Regulator if you believe that we have interfered with the protection of your personal information. The Information Regulator's contact details are as follows:

- General enquiries: enquiries@inforegulator.org.za
- POPIA complaints: complaints.POPIAComplaints@inforegulator.org.za
- Telephone: 010 023 5200
- Address: Woodmead North Office Park, 54 Maxwell Drive, Woodmead, Johannesburg, 2191



13

Changes to this privacy notice

We may update this privacy notice from time to time to reflect changes in our processing activities or legal requirements. The most current version will always be available on our website. We encourage you to review this notice periodically.

14

Contact us

If you have any questions about this privacy notice or our data practices, or if you wish to exercise any of your rights, please contact us:

- Information Officer: Sadicka Hajwanie-Timm
- Email: info@pangolin.africa
- Address: 37 Eksteen Avenue, Bergvliet, 7945, Cape Town, South Africa
- Website: <https://www.pangolin.africa/>