



# Privacy Policy

Policy last updated 1 December 2021

This privacy policy discloses the privacy practices for the Community Rhino Conservation Initiative.

Our website is [www.hwangecommunityrhino.com](http://www.hwangecommunityrhino.com)

By submitting personal data to us via our Contact form, you give your consent that all personal data that you submit will be processed by us in the manner and for the purposes described below. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

## 1. Personal Data

We are committed to protecting the privacy of the users of our website. We are the sole owner of the information collected on the website. We will not sell, share, or rent this information to others in ways different from those disclosed in this statement.

Once personal data is no longer needed it is deleted from our files.

We collect, store and use the following kinds of personal information: information about your computer and about your visits to and use of our websites (which may include your IP address, geographical location, browser type and version, referral source, entry page, exit page, length of visit, number of page views, route taken through our website, and similar information); information relating to payments you make (which may include your name, address and email address).

We only use your personal information to: administer the website; send you a confirmation and thank you email and to provide updates on the project if you have given us consent to do as such.

## 2. Compliance

The Community Rhino Conservation Initiative is committed to processing data in accordance with its responsibilities under the The Access to Information and Protection of Privacy Act (Chapter 10:27) as guided by the Postal and Telecommunications Regulatory Authority of Zimbabwe ('POTRAZ'). In line with legal guidance, personal data shall be:

- a. processed lawfully, fairly and in a transparent manner in relation to individuals;
- b. collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes;
- c. adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- d. accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;
- e. kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed

solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals; and

- f. processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

### **3. General provisions**

- a. This policy applies to all personal data processed by the Initiative website.
- b. The Initiative's leading partner, Imvelo Safari Lodges, shall take responsibility for the website's ongoing compliance with this policy.
- c. This policy shall be reviewed at least annually.
- d. To ensure its processing of data is lawful, fair and transparent, the Initiative shall appoint a Project Manager to maintain a data register.
- e. Individuals have the right to access their personal data and any such requests made to the Initiative shall be dealt with in a timely manner.

### **4. Lawful purposes**

- a. All data processed by the charity must be done on one of the following lawful bases: consent, contract, legal obligation, vital interests, public task or legitimate interests
- b. Beyond thank you emails for donations, consent needs to be provided so that individuals can receive updates about projects they have donated towards.
- c. The option for individuals to revoke their consent should be clearly available.

### **5. Data minimisation**

- a. The Initiative shall ensure that personal data are adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed. This might include name and email address.

### **6. Accuracy**

- a. The Initiative shall take reasonable steps to ensure personal data is accurate.
- b. Where necessary for the lawful basis on which data is processed, steps shall be put in place to ensure that personal data is kept up to date.
- c. The Initiative will easily be contactable if someone wants to update their personal data.

### **7. Archiving / removal**

- a. To ensure that personal data is kept for no longer than necessary, the Initiative shall put in place an archiving statement for each area in which personal data is processed and review this process annually.
- b. The archiving statement states that data should be retained for the financial year and for as long as the project donated towards is in progress. Data will not be retained beyond this period of time, unless consent has been granted.

### **8. Security**

- a. The Initiative shall ensure that personal data is stored securely using modern software that is kept-up-to-date.

- b. Access to personal data shall be limited to personnel who need access.
- c. When personal data is deleted this should be done safely such that the data is irrecoverable.
- d. Appropriate back-up and disaster recovery solutions shall be in place.

## **9. Breach**

In the event of a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data, the Initiative shall promptly assess the risk to people's rights and freedoms and if appropriate report this breach to relevant authorities.

## **10. Other considerations**

We do not send unsolicited bulk e-mails. We only send e-mails to individuals who have provided their consent.

You can request us to provide you with any personal information we hold about you.

## **11. Disclosures**

We do not share, sell or disclose to third parties any personal data disclosed to us.

We only disclose information about you: to the extent that we are required to do so by law; in connection with any legal proceedings or prospective legal proceedings; in order to establish, exercise or defend our legal rights.

The Initiative does not store financial information.

## **12. Cookies**

By using our website you agree to our use of web cookies in accordance with our privacy statement.

## **Contact**

If you have any questions at all about this statement or the website, or about how we use and process your personal information, please do not hesitate to contact us by e-mail at [\*\*hwangeCRCI@gmail.com\*\*](mailto:hwangeCRCI@gmail.com)