

Protection of Personal Information Act (POPIA) Policy

Entity Name: Nhoru Earth (Pty) Ltd **Document Version:** 1.0 **Effective Date:** 25 August 2026

1. Purpose & Scope

This policy sets out how Nhoru Earth collects, uses, stores, discloses, and protects Personal Information in compliance with South Africa's Protection of Personal Information Act, No. 4 of 2013 (POPIA).

This policy applies to all employees, contractors, direct clients, travel agents, and visitors to our website or lodge facilities.

2. Information We Collect

In operating safari tours, accommodations, and related travel services, Nhoru Earth collects the following types of information:

Identity Data: Full names, nationality, passport numbers, dates of birth, and identity numbers.

Contact Data: Email addresses, phone numbers, emergency contact details, and physical addresses.

Booking & Financial Data: Bank details, credit card information (processed securely via PCI-compliant payment gateways), itinerary preferences, and booking history.

Special Personal Information: Medical conditions, dietary requirements, or mobility limitations (collected strictly to ensure guest safety and comfort on safari).

Biometric or health-related data (e.g., liability waivers or emergency medical response details).

Minor Data: Names and ages of children travelling under the age of 18 (processed with parental/guardian consent).

3. How We Use Personal Information

Nhoru Earth processes personal data strictly for lawful, operational purposes:

- Executing safari bookings, transfers, park permits, and accommodation arrangements.
- Managing dietary, health, and safety needs during excursions.
- Processing payments, invoices, and accounting records.
- Communicating pre-arrival details, itineraries, and post-safari feedback requests.
- Fulfilling legal requirements (e.g., South African Tourism, SARS, and regional conservation authority compliance).

4. Legal Basis for Processing

We process personal information under the following conditions:

Consent: When you explicitly opt-in or sign booking agreements and indemnity forms.

Contractual Necessity: To carry out the safari services you have purchased.

Legal Obligation: To comply with South African laws, statutory record-keeping, and regulatory reporting.

Legitimate Interest: To protect the vital interests of guests (e.g., medical emergencies in remote wilderness areas).

5. Sharing of Personal Information

Nhoru Earth does not sell, rent, or trade personal information. We share data only with third parties essential to delivering our services:

Third-Party Service Providers: Partner lodges, transfer companies, charter flights, local game reserves, and certified field guides.

Emergency Services: Medical evacuation teams, doctors, and insurers in the event of an emergency.

Regulatory & Legal Authorities: Law enforcement or government bodies where required by South African law.

Where third parties process data on our behalf, we ensure written agreements are in place requiring them to maintain strict POPIA compliance.

6. Cross-Border Data Transfers

Due to the international nature of safari travel, personal information (such as passport details and itinerary preferences) may be transmitted across borders to international travel agents, tour operators, or cloud storage providers. We ensure foreign recipients adhere to data protection standards equivalent to POPIA.

7. Data Security Safeguards

Nhoru Earth implements appropriate physical, operational, and technical security measures:

- Encrypted digital storage and secure, password-protected databases.
- Restricted employee access to sensitive data on a need-to-know basis.
- Secure destruction of physical copies (e.g., guest registration slips and medical waivers) once retention periods expire.

8. Data Retention

We retain personal information only for as long as necessary to fulfill the purpose for which it was collected, or as required by South African statutory retention periods (e.g., 5 years for financial records under SARS requirements).

9. Your Rights as a Data Subject

Under POPIA, guests and stakeholders have the right to:

Access: Request a copy of the personal information we hold about you.

Correction: Request the updating or correction of inaccurate details.

Objection & Deletion: Object to processing or request the deletion of data (subject to legal retention obligations).

Direct Marketing Opt-Out: Unsubscribe from promotional communications at any time.

10. Information Officer Contact Details

To exercise your rights, submit a query, or lodge a data privacy complaint, contact our Information Officer:

Entity: Nhor Earth (Pty) Ltd

Attention: Wendy Ackermann

Email: nhoroeearth@gmail.com

Phone: +27 (0) 82 391 3118

Physical Address: 255 Rotsvy Road, Hoedspruit, Limpopo 1380

If you are unsatisfied with our response, you have the right to lodge a complaint with the South African Information Regulator:

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

Email: enquiries@inforegulator.org.za / POPIAComplaints@inforegulator.org.za