

DoNation Privacy Policy **(Last updated on 05 October 2022)**

Silvertree Foundation with registration number 2021/793889/08 and registered address of 125 Buitengracht Street, Cape Town, 8001 is the operator of the DoNation website and service. Silvertree Foundation is a registered non-profit company which has been established to bridge the gap between potential donors and public benefit organisations in South Africa and, in so doing, to unlock more giving in South Africa.

Silvertree Foundation is committed to protecting your privacy and complying with applicable data protection and privacy laws. Any personal information that you provide through the DoNation website and service will be collected, used and retained by Silvertree Foundation in accordance with this Privacy Policy. The purpose of this Privacy Policy is to inform you of Silvertree Foundation's privacy practices and to explain how we collect, store, use, transfer and disclose your personal information. We also describe the kinds of information that Silvertree Foundation collects from you.

The DoNation website may include links to other companies' websites and other third party services that have privacy policies of their own, including, for example, the partner public benefit organisations that DoNation supports. We recommend that you also read these websites' policies. Silvertree Foundation will not be held responsible for any negative consequences, legal or otherwise, that may result from your use of any third party websites or services.

By accessing and using the DoNation website and/or by submitting personal information to Silvertree Foundation through any other means, you agree to the processing of your personal information in the manner provided for in this Privacy Policy.

What information is personal information?

Personal information is information that can be used to identify you. Personal information includes, for example, your name, contact information, email address, identity number, SARS income tax number, credit card or debit card details, and information about your online behaviour. Information that does not identify a particular individual, such as statistical information, is not personal information and is not covered by this Privacy Policy.

What type of information does Silvertree Foundation collect?

- **Information required from donors**

When you open an online user account through the DoNation website in order to view your donations and section 18A certificates or to make a donation using the DoNation service as a donor, you will be asked to provide certain personal information, including your first name, surname, email address, phone number, full residential address and SARS income tax number.

Silvertree Foundation will also collect information from your online user account relating to your donations using the DoNation service and/or through those public benefit organisations supported by DoNation for the purposes of providing you with a section 18A certificate as well as any information necessary for the completion of your annual tax return. This will include information such as the amount of the donation, the recipient of the donation and the purpose of the donation.

- **Information required from partner public benefit organisations**

When you use the DoNation widget or otherwise make use of the DoNation service as a partner public benefit organisation, you will be required to provide certain personal information relating to your organisation, including the name of the organisation, place of business, contact details, employee details and PBO number.

Silvertree Foundation will also collect information from the organisation's account relating to donations received through the DoNation service or the DoNation widget for the purposes of generating section 18A certificates for donors. This will include information such as the amount of the donation, the name and contact details of the donor and the purpose of the donation

- **Online information**

DoNation's website and online services may also use "cookies" and other technologies such as pixel tags and web beacons for the purposes of processing information and for monitoring the effectiveness of the DoNation website, its search engines and advertisements.

The purpose of a cookie is to make your DoNation experience more customised and convenient. Cookies are also used for website traffic analysis and anonymous demographic profiling so that we may improve our services. Other than the data that you choose to share with us, a cookie in no way gives us access to your computer or any information about you. Although most web browsers automatically accept cookies, you may refuse cookies by modifying your browser settings. However, if you choose to turn off the cookies, you may not be able to view certain parts of the DoNation website that may enhance your visit.

The information that Silvertree Foundation may process with web beacons and pixel tags includes: your internet protocol (IP) address, access times, the website you linked from, your computer's operating system, your browser type and the address of any referring sites as well as pages you have visited and any other content that you have viewed. This information does not allow Silvertree Foundation to identify individual users personally, is used to improve our services and is used to collate generalised demographic data of our online users, such as geographic areas of our visitors and visitor browsing patterns.

How is your personal information used?

Only personal information or data that is necessary for the purposes stated in this Privacy Policy will be collected, used and otherwise processed by Silvertree Foundation.

- **Provision of services:** we may use your personal information to identify you as an individual user or public benefit organisation, to send you confirmation of any donations made through the DoNation service, to issue you with any relevant section 18A certificate(s) in relation to any donation(s) made using the DoNation services, to provide you with a report of any donations prior to the required submission of an annual tax return, to respond to your queries, complaints and requests and to contact you for any other reason (to the extent that this is necessary). We may also use your personal information to ensure the functionality of our services, and to personalise our offerings and to provide you with a service more relevant to you.
- **Development of services:** we may use your personal information to help us understand your needs and interests and to develop, deliver, and improve our services, content, advertising and communications. We will often use aggregate and statistical information in the development of our services. We may also use your personal information to personalise our offerings and to provide you with a service more relevant to you. We may also use personal information for internal purposes such as auditing, data analysis, and research to improve DoNation's services and user communications.
- **A database of users:** we may use your personal information as a user of the DoNation website and services to create a database of users. This database will be used to maintain details of existing users, including contact information, previous donations and any issued section 18A certificates, so as to help remember you and your preferences in future donations, and to facilitate a more convenient, efficient and customised service.

- **Communicating with you and marketing:** You will always be given an opportunity to opt-out of receiving our marketing communications.
 - We may use your personal information to send important notices, such as communications about donations, and changes to our terms and conditions and policies.
 - We may use your personal information to update you on DoNation's latest services or partner public benefit organisation. If you do not want to be on our mailing list, you will always be given an option to opt-out of receiving these marketing communications.
 - We may use your personal information to communicate with you, for example, to provide information relating to our services you are using or to contact you for user satisfaction queries. You will always be given an opportunity to opt-out of receiving these communications.
 - We may use your personal information for marketing or research purposes, for example, to conduct market research in accordance with applicable law.

How to opt-out

You can choose not to receive marketing communications from us at any time by either:

- using the unsubscribe facility in an e-mail or other electronic communication from us; or
- sending an e-mail to: info@thedonation.org.za.

We will remove you from our marketing lists as soon as is reasonably practicable after you opt-out.

What information may be disclosed to third parties?

- **Authorised third parties and service providers:** Silvertree Foundation may share certain personal information with its strategic partners and service providers that work with Silvertree Foundation to provide DoNation's services or to process donations. Silvertree Foundation's strategic partners and service providers are contractually required to protect your personal information and will be restricted from using the personal information you provide other than is reasonably necessary to perform their services for us.

Silvertree Foundation will never share your personal information with third parties for their marketing purposes without your consent.

- **Mandatory disclosure:** It may be necessary, to comply with any law, for the purposes of litigation, or to comply with requests from public and governmental authorities within or outside your country of residence for Silvertree Foundation to disclose your personal information.
- **Necessary disclosure:** Silvertree Foundation may also disclose information about you if we determine that disclosure is reasonably necessary to enforce our terms and conditions or protect our operations or users. Further, if all or part of the DoNation service is bought, sold or otherwise transferred, the personal information you provide or we collect, including sensitive personal information, may be transferred as part of the purchase, sale or transfer.

Collecting the data of minors

Silvertree Foundation's **DoNation Online Terms and Conditions** do not permit minors to make donations or engage in other legal acts in relation to our services without the consent of a parent or legal guardian, unless otherwise permitted by applicable law. As such, Silvertree Foundation does not knowingly collect any information from or engage in any transactions with persons under the age of 18 years who do not have the consent of their parents or

guardians. Our databases may nevertheless contain personal information of persons under 18 years because it is not always possible for us to determine precisely the age of the user.

Data accuracy

We take reasonable steps to ensure that the personal information we collect and store is accurate, complete and up-to-date. We also endeavour as best we can to delete any out-of-date, incorrect or unnecessary personal data.

You can help us ensure that your personal information is accurate, complete and up-to-date by logging in to your user account and managing your personal information. Please remember that it is your responsibility to provide us with your correct details as well as to update the personal information you previously provided to us in the event of any changes.

Cross-border transfers of personal information

Personal information that is collected by Silvertree Foundation will likely be stored on servers in South Africa. However, Silvertree Foundation may transfer personal information outside of South Africa to servers which may be subject to different laws or requirements regarding the protection of personal information. In such cases, Silvertree Foundation will always take steps to ensure that your personal information is adequately protected. These steps may include concluding appropriate agreements or requiring that the appropriate technical, operational or security measures are put in place.

How do we ensure that your personal information is protected?

Silvertree Foundation is committed to ensuring that your personal information is secure and will take reasonable steps through physical, electronic and managerial procedures to ensure that your personal information is treated securely and in accordance with this Privacy Policy. While this will minimise the risk of loss, misuse, alteration, disclosure and unauthorised access of your information that is under our control, transactions that are performed over the Internet may be vulnerable to being intercepted.

Although we will do our best to protect your personal information, **Silvertree Foundation cannot guarantee the security of your personal information submitted to the DoNation website or when using DoNation's services and will not be liable for any interception that occurs and any loss that is suffered as a result, where Silvertree Foundation has taken reasonable steps to prevent this happening.**

How long is your personal information retained for?

We will keep your personal information only for as long as is necessary to achieve the purpose for which the information was collected. For example, if you close your online user account with DoNation, we will delete the information that we collected from you in order to administer your online donations. If you tell us that you do not wish to receive information about new partner public benefit organisation we will delete your contact details unless we require your details for another purpose.

Changes to the Privacy Policy

Silvertree Foundation may from time to time change or update this Privacy Policy. If this Privacy Policy is changed in a material way, Silvertree Foundation will post a notice on the DoNation website notifying users of this change alongside the updated Privacy Policy for 30 days. We recommend that you re-visit the DoNation website and this Policy from time to time to learn of any such changes to the Privacy Policy.