

**Document Name:** Privacy Policy  
**Document Number:** POL.COM.001  
**Effective Date:** 07 April 2026  
**Date of Revision:** 07 April 2026  
**Version Number:** v1



## PRIVACY POLICY

This Privacy Policy explains how Kira Investments (Pty) Ltd (“we”, “us”, “our”) processes personal information under South Africa’s Protection of Personal Information Act, 2013 (POPIA).

### Who we are:

- Kira Investments (Pty) Ltd Trading as: Kira Safaris
- Registration Number: 2023/098862/07
- Physical Address: 18 Rooibank Road, Rooibank 89-JR, Pretoria, South Africa
- Email: [info@kirasafaris.co.za](mailto:info@kirasafaris.co.za)
- Telephone: +72 (0)79 515 1965

Kira Investments (Pty) Ltd is a private company registered in South Africa.

We are accountable for the personal information we handle, and process it in line with POPIA’s conditions, namely; Accountability; Processing Limitation; Purpose Specification; Further Processing Limitation; Information Quality; Openness; Security Safeguards; and Data Subject Participation.

### 1. What is collected

We, Kira Investments (Pty) Ltd, collect and process the following categories of personal information, as relevant to our services and your interactions with us:

- **Contact details:** title, name and surname, email address, contact number, ID number, age, physical address, special needs (disability), company.
- **Business/transactional information:** booking data, invoices, statements, supplier/customer details.
- **Support and correspondence:** messages, call notes, meeting notes, emails.
- **Website and device data:** pages viewed, form interactions, IP address, basic device/usage data (via cookies or similar—see Cookies Policy).
- **Payment information:** invoice and remittance details (we do **not** store credit card details on our servers).

We do not intentionally collect special personal information (e.g., health, biometric, religious beliefs) or children’s data. If such information is inadvertently provided, we will secure and minimise it and delete where appropriate.

### 2. How we obtain personal information

- Directly from you (forms, emails, calls, meetings, booking documents).
- From your authorised representatives (e.g., your staff or service providers you instruct us to liaise with).
- Automatically when you use our website (cookies/analytics).

### 3. Why we process personal information (purpose)

We process personal information for:

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- Providing our services (Luxury accommodation, safari experiences and related support you request).
- Client booking and administration (creating accounts, verifying details, billing/invoicing).
- Compliance and legal obligations (record-keeping required by law, responding to lawful requests).
- Communication (responding to enquiries, and other operational messages).
- Improvement and security (service quality, troubleshooting, fraud prevention).
- Direct marketing (only with your consent or as permitted by law; you can opt out at any time).

#### **4. Lawfulness and minimality (Processing Limitation)**

We process only what is adequate, relevant, and not excessive for the stated purposes and do so on lawful grounds permitted by POPIA, including your consent, performance of a contract, and legal obligations. Where required, we will request your explicit consent, and you may withdraw consent at any time.

#### **5. Retention**

We keep personal information only as long as necessary for the purposes above or as required by law. Typical periods include:

- Client and financial records: retained for 5 years (Tax Administration Act) and certain company records up to 7 years (Companies Act).
- Sales and enquiry records: up to 24 months after last interaction, unless you become a client or consent to longer retention (e.g., for legal defence). When retention periods end, we securely delete or de-identify the data.

#### **6. Sharing and disclosures**

We may share personal information with:

- Operators (processors) who assist us (e.g., secure hosting, email, analytics, CRM, communications, storage, accounting tools). They act under contract and must protect your data.
- Professional advisors (legal, tax, audit) under confidentiality.
- Regulators or law enforcement where legally required.
- Parties you authorise us to share with in the course of providing services.

We do not sell personal information.

#### **7. Cross-border- transfers**

If we transfer personal information outside the Republic of South Africa (for example, to cloud services hosted abroad), we will ensure that the recipient is subject to law, binding corporate rules, contract, or another mechanism that provides adequate protection as required by POPIA.

#### **8. Security safeguards**

We use appropriate technical and organisational measures to protect personal information from loss, misuse, unauthorised access, disclosure, alteration, and destruction, including:

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**Effective Date:** 07 April 2026  
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- Access controls and least privilege permissions
- Encryption in transit (HTTPS) and secure storage
- Strong authentication on systems
- Regular updates and security patching
- Backups and recovery procedures
- Staff confidentiality undertakings and awareness

No method of transmission or storage is completely secure; however, we continuously improve our safeguards.

## 9. Your rights (Data Subject Participation)

Under POPIA, you may:

- Access your personal information that we hold.
- Request correction of inaccurate, irrelevant, excessive, out-of-date-, incomplete, or misleading information.
- Request deletion or destruction where legally permissible.
- Object to processing, including for direct marketing.
- Withdraw consent where processing is based on consent.
- Complain to the Information Regulator if you believe your rights have been infringed upon.

To exercise your rights, contact us at:

Email: [info@kirasafaris.co.za](mailto:info@kirasafaris.co.za)

Telephone: +27 (0)79 515 1965

We may require proof of identity and enough information to locate the records.

## 10. Direct marketing

We only send electronic direct marketing with your consent or as otherwise permitted by POPIA. You can opt out at any time by using the unsubscribe link or by emailing us at

Email: [info@kirasafaris.co.za](mailto:info@kirasafaris.co.za)

Telephone: +27 (0)79 515 1965

## 11. Cookies and similar technologies

We use cookies (and similar) to operate the website, remember preferences, and understand usage.

## 12. Openness and PAIA

Where applicable, our **PAIA manual** (if required for our organisation) explains how to request access to records under the Promotion of Access to Information Act. Contact us if you need assistance.

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### **13. Third-party links**

Our website may link to third-party sites. Their privacy practices are their own; please review their policies.

### **14. Changes to this Policy**

We may update this Policy from time to time. We will post the new version with an updated date and, where appropriate, notify you via the website or email.

### **15. Contact us**

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If we cannot resolve your concern, you can contact the Information Regulator (South Africa). See the Regulator's website for current contact details and complaint procedures: [info regulator.org.za](http://info regulator.org.za).