



## **IZINGA ASSIST**

# **GLOBAL PRIVACY POLICY**

**Last Updated:** May 2026

### **1. INTRODUCTION AND SCOPE**

Welcome to the iZinga Assist Platform. iZinga Assist is a cross-border initiative dedicated to maximising the impact of non-profit support while maintaining the highest standards of transparency and legal compliance.

Because we operate internationally, the Platform is managed by three distinct legal entities acting as Joint Data Controllers (referred to as "Responsible Parties" in South Africa):

- IZ Assist UK CIC (Company No. 14687128), a Community Interest Company incorporated in England and Wales, responsible for UK donor engagement and payment processing.
- IZINGA ASSIST UK CIO, a community charitable incorporated organisation established in terms of the Charities Act, 2011 of the United Kingdom and registered with the Charities Commission of England and Wales. Charity number: 1198317.
- iZinga Assist NPC (Registration No. 2021/733782/08), a Non-Profit Company

incorporated in the Republic of South Africa, responsible for NPO verification, compliance, and local fund distribution.

Together, these entities are referred to as "iZinga Assist", "we", "us", or "our" in this Global Privacy Policy.

We respect your privacy and are committed to protecting your personal data. This Global Privacy Policy explains how we collect, process, and safeguard your information whether you are a Donor utilising our platform, or Charity (as commonly referred to in the UK) or a Non-Profit Organisation (as commonly referred to in South Africa) undergoing our verification process.

This Policy is drafted to comply with the highest global data protection standards, specifically incorporating the requirements of:

- The UK General Data Protection Regulation (UK GDPR) and the UK Data Protection Act 2018; and
- The South African Protection of Personal Information Act 4 of 2013 (POPIA).

## 2. KEY DEFINITIONS

To ensure clarity across different legal jurisdictions, the following terms apply throughout this Policy:

- "Personal Data" (or "Personal Information"): Means any information relating to an identified or identifiable natural person. Crucially, in accordance with South African law (POPIA), this definition also extends to protect the information of identifiable, existing juristic persons (such as companies, trusts, and registered NPOs).
- "Data Subject": The natural or juristic person to whom the personal data relates (e.g., a UK Donor, a South African NPO, or an NPO Board Member).
- "Donor Directory": A compiled database of public-domain contact information relating to philanthropic organisations, trusts, foundations, corporate donors, and their associated professional contacts, which is maintained by iZinga Assist and made available under strict licence to verified NPOs for charitable prospect research.
- "Processing": Any operation performed on personal data, whether or not by automated means, such as collection, recording, structuring, storage, alteration, retrieval, use, disclosure by transmission, or destruction.
- "Special Personal Information": Sensitive personal data requiring elevated protection, including information concerning a natural person's race, health, religious beliefs, political affiliations, biometric data, or criminal behaviour.

## 3. THE DATA WE COLLECT ABOUT YOU

We collect different categories of information depending on whether you are a Donor supporting a cause, or an NPO seeking verification.

### 3.1. If You Are a Donor (Natural Person)

We may collect, use, store, and transfer the following kinds of personal data about you:

- Identity Data: First name, last name, title, and username.
- Contact Data: Billing address, email address, and telephone numbers.
- Financial Data: Bank account details and payment card details (processed securely via our third-party payment gateways; we do not store full card details

on our servers).

- Organisational Data: We collect various organisational data aimed at aiding with the verification of NPOs for reasons of legal compliance, governance, financial management and impact. The specific data requested are set out in more detail when onboarding on our platform.
- Transaction Data: Details about payments to and from you, and the specific charities you have supported.
- Tax Data: Your UK Taxpayer status (for Gift Aid declarations) or South African Income Tax reference number (for Section 18A tax certificates).
- Technical Data: IP address, browser type, time zone setting, and location data when you interact with our Platform.

### **3.2. If You Are an NPO (Juristic Person)**

Under South African law (POPIA), existing juristic persons are entitled to privacy protection. We collect:

- Organisational Data: Registered NPO name, NPO registration number, PBO approval letter and other relevant data.
- Constitutional Data: Your founding documents (e.g., Constitution, Memorandum of Incorporation, or Trust Deed) and proof of registration with the Directorate for NPOs.
- Financial and Compliance Data: Bank account confirmations, recent financial statements, tax clearance certificates, and B-BBEE status.
- Representative Data: The names, contact details, and Identity Numbers of your office bearers (Directors, Trustees, or Management Committee members) authorised to represent the NPO.

### **3.3 If You Are a Professional Contact in the Donor Directory**

We maintain a Donor Directory compiled entirely from publicly available sources (such as charity commission registers, corporate websites, and public grant-making portals). If you are a trustee, director, grant administrator, or other professional contact associated with a funding organisation, we may process the following data about you:

- Identity Data: First name, last name, and professional title or role.

- Contact Data: Professional email address, telephone number, and the physical/postal address of your organisation.
- Organisational Data: The name of the trust, foundation, or corporate entity you represent, its funding categories, and application guidelines.

*Source of Data*: We do not collect this data directly from you. It is compiled from public domain sources and was lawfully assigned to IZ Assist UK CIC

#### 4. HOW WE USE YOUR DATA AND OUR LAWFUL BASES

We will only use your personal data when the law allows us to. On the next page is a description of how we use your data and the specific legal basis we rely on under both UK GDPR (Article 6) and POPIA.

Purpose / Activity	Type of Data	Lawful Basis for Processing
1. To register you as a new Donor or NPO	Identity, Contact, Organisational	<b>Performance of Contract:</b> We need this to create your account and provide our services to you.
2. To process and deliver your donation	Identity, Financial, Transaction	<b>Performance of Contract:</b> Essential to move funds from the donor to the beneficiary. <b>Legal Obligation:</b> We must process transaction records for tax and accounting laws in both the UK and SA.
3. To verify NPO eligibility and perform sanctions screening	Representative Data (ID Numbers), Constitutional Data	<b>Legal Obligation:</b> We are required to verify the identity of directors and screen against the UNSC Targeted Financial Sanctions (TFS) list and the NPO Act requirements to prevent money laundering and terrorist financing. <b>Legitimate Interests:</b> To ensure the integrity of our Platform and prevent fraud.
4. To issue Tax	Identity, Tax Data,	<b>Legal Obligation:</b> We are required by HMRC (UK)

Purpose / Activity	Type of Data	Lawful Basis for Processing
<b>Certificates (Gift Aid / Sec 18A, once iZinga Assist has s18A status)</b>	Transaction	and SARS (SA) to report on tax-deductible donations.
<b>5. To manage our relationship with you</b>	Identity, Contact, Profile	<b>Legitimate Interests:</b> To keep our records updated and notify you of changes to our terms or privacy policy.
<b>6. To improve our Platform (Data Analytics)</b>	Technical, Usage	<b>Legitimate Interests:</b> To study how customers use our products, develop them, and grow our business.
<b>7. To compile, maintain, and license the Donor Directory</b> to verified NPOs to facilitate charitable funding and prospect research	Identity, Contact, Organisational	<b>Legitimate Interests:</b> Necessary for our legitimate interests (and those of the verified NPOs) to support the non-profit sector by connecting verified charities with publicly listed funding opportunities. We have conducted a Legitimate Interests Assessment to ensure this does not override your fundamental rights, given that the data is professional in nature and already in the public domain

#### 4.2. Specific Note on Identity Numbers and Sanctions Screening

We collect the Identity Numbers of NPO office bearers strictly for the purpose of validation. We cross-reference these numbers against the United Nations Security Council (UNSC) Targeted Financial Sanctions list, the register of the NPO Directorate, the Companies and Intellectual Property Commission, the Department of Home Affairs and South Africa's Sexual Offences Register and to ensure that office-bearers are eligible to serve in that capacity, as required under the NPO Act.

## 5. DISCLOSURE AND SHARING OF YOUR DATA

To operate the Platform effectively and facilitate the distribution of funds, we may share your personal data with the following parties:

- Internal Sharing (Joint Controllers): Data is shared securely between IZ Assist UK CIC, iZinga Assist UK CIO, and iZinga Assist NPC.
- Service Providers (Processors / Operators): We utilise trusted third-party service providers to support our operations. These include:
  - Cloud storage and IT infrastructure providers.
  - Secure payment gateways and financial disbursement partners (such as the Shoprite Money Market Account system) to facilitate donations and distribute funds to NPOs.
  - Communication and email distribution platforms.
- Regulatory Authorities: We may be required to disclose your data to regulators, including HM Revenue & Customs (HMRC) in the UK, the South African Revenue Service (SARS), the UK Information Commissioner's Office (ICO), or the South African Information Regulator.
- Professional Advisers: Including lawyers, bankers, auditors, and insurers who provide consultancy, banking, legal, insurance, and accounting services.
- Verified NPOs (Purchasers): If you are listed in the Donor Directory, your professional contact details are made available under a strict, restricted licence to South African NPOs that have passed our verification process. These NPOs are contractually bound to use your data solely for legitimate charitable prospect research, to comply with all direct marketing laws (including POPIA Section 69), and to provide you with an opportunity to opt out of any communications

We require all third parties to respect the security of your personal data and to treat it strictly in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes; they are only permitted to process your data for specified purposes and in accordance with our documented instructions.

## 6. INTERNATIONAL DATA TRANSFERS

Due to the international nature of our initiative, personal data must flow across borders to achieve our charitable objectives. We have implemented robust legal safeguards to

ensure your privacy rights travel with your data.

### **6.1. Transfers from the UK to South Africa (and other non-adequate jurisdictions)**

When a UK Donor makes a contribution, certain transaction data must be accessed by or transferred to iZinga Assist NPC in South Africa to allocate the funds to the designated charity. Because South Africa is not currently deemed to have an "adequacy decision" under UK data protection laws, we safeguard these restricted transfers by implementing a Group Governance Framework and an Affiliation Agreement between the three iZinga entities. This legally binds the South African NPC to protect UK data to the exact standard required by the UK GDPR.

Should we expand our operations to support charities in additional countries in the future, any transfer of UK donor data to those jurisdictions will be protected by the same strict IDTA mechanisms unless an adequacy decision applies.

### **6.2. Transfers from South Africa to the UK**

When a South African NPO undergoes verification on our Platform, their corporate and representative data is hosted on our secure cloud infrastructure, which may be accessed by IZ Assist UK CIC. Under Section 72 of POPIA, we are permitted to transfer personal information outside of South Africa because the United Kingdom's data protection framework (the UK GDPR) provides an adequate, legally binding level of protection that upholds the principles of POPIA.

## **7. DATA SECURITY**

We have implemented robust, industry-standard security measures to prevent your personal data from being accidentally lost, used, accessed in an unauthorised way, altered, or disclosed. This complies with both Article 32 of the UK GDPR and Section 19 of POPIA.

Our security framework includes:

- Encryption and Access Controls: All personal data is stored on secure, encrypted cloud servers. Access to personal data is strictly limited to employees, agents, contractors, and other third parties who have a critical business need to know.
- Financial Security: We do not store your credit card details. All transactions are processed through strictly vetted, secured and compliant payment gateways. Fund disbursements to NPOs in South Africa are handled securely via the traceable Shoprite Money Market Account system.
- Breach Notification: We have procedures in place to deal with any suspected personal data breach. In the event of a breach, we will notify you and the

relevant regulators (the UK ICO and/or the SA Information Regulator) where we are legally required to do so.

- All company documents and personal data are stored on a centralised, secure cloud infrastructure (Microsoft Teams/SharePoint). Access is restricted to authorised personnel.

## 8. DATA RETENTION

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting, or reporting requirements.

To determine the appropriate retention period, we consider the amount, nature, and sensitivity of the data, the potential risk of harm from unauthorised use, and the applicable legal requirements in both jurisdictions:

- Financial and Tax Records: By law, we are required by HMRC (UK) and SARS (South Africa) to retain the prescribed information about our Donors and NPOs (including Contact, Identity, Financial, and Transaction Data) for a period of six (6) years after the end of the financial year in which the transaction occurred.
- Account Data: General profile data and correspondence will be retained for the duration of your active relationship with iZinga Assist, and for a period of up to six (6) years thereafter to cover the statutory limitation periods for potential legal claims in both the UK and South Africa.
- **Donor Directory Data**: We retain professional contact information in the Donor Directory for as long as the information remains relevant and publicly associated with active grant-making or philanthropic activities. If you exercise your right to object or opt out, your contact details will be promptly removed from the active Directory and placed on a suppression list to ensure you are not re-added in the future.

## 9. YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under the data protection laws of the United Kingdom (UK GDPR) and South Africa (POPIA) in relation to your personal data. Whether you are a natural person (Donor) or a juristic person (NPO), you have the right to:

- Request access to your personal data: You can ask for a copy of the personal data we hold about you to check that we are lawfully processing it.

- Request correction: You can ask us to correct any incomplete or inaccurate data we hold about you.
- Request deletion: You can ask us to delete or remove personal data where there is no good reason for us to continue processing it.
- Object to processing: You can object where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing. You also have the absolute right to object where we are processing your data for direct marketing purposes.
- Request restriction of processing: You can ask us to suspend the processing of your personal data (e.g., if you want us to establish its accuracy).
- Request data portability: (Primarily applicable under UK GDPR). We will provide you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format.
- Withdraw consent: If we are relying on your consent to process your data, you can withdraw it at any time.
- Special Note for Donor Directory Contacts: Because we rely on "Legitimate Interests" to process your professional contact details in the Directory, you have an absolute right to object to this processing. If you wish to be removed from the Directory, please contact us at the details below, and we will remove your information immediately without requiring any justification.

#### No Fee Usually Required:

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable administration fee if your request is clearly unfounded, repetitive, or excessive, or if you request physical copies under the South African Promotion of Access to Information Act (PAIA).

## **10. CONTACT DETAILS AND COMPLAINTS**

If you have any questions about this Global Privacy Policy or wish to exercise your legal rights, please contact our designated privacy officers:

#### **For the United Kingdom:**

- Data Protection Officer (DPO): Henk Swanepoel

- Email: [henk@izassist.org](mailto:henk@izassist.org)
- Address: IZ Assist UK CIC, 1 The Green, Richmond, Surrey TW91PL

**For South Africa:**

- Information Officer: Ms. Adél Burger
- Email: [adel@izassist.org](mailto:adel@izassist.org)
- Website: <https://izassist.org/>

Your Right to Complain to the Regulator

We would appreciate the opportunity to deal with your concerns before you approach the authorities. However, you retain the right to make a complaint at any time to your respective national data protection regulator:

- UK Residents: The Information Commissioner's Office (ICO) ([www.ico.org.uk](http://www.ico.org.uk)).
- South African Residents: The Information Regulator (South Africa) ([inforeg@justice.gov.za](mailto:inforeg@justice.gov.za) or <https://inforegulator.org.za/>).