



PRIVACY POLICY

Habitat XR & Habitat Nature Connection Foundation Apps

This Privacy Policy applies to all applications, experiences, and interactive services ("the Apps") published by Habitat XR (Pty) Ltd (reg. 2012/019181/07) and/or Habitat Nature Connection Foundation NPC, a registered South African non-profit company and Public Benefit Organisation (Registration No: 2019/265195/08) (together, "Habitat XR," "we," "us," or "our"), including but not limited to apps distributed on Meta Horizon, App Store, Google Play, and other platforms.

Where a specific App is operated by only one of these entities, that entity is the data controller for that App; this policy applies equally regardless of which entity operates a given App.

We are committed to protecting your privacy and complying with applicable data protection laws, including:

- South Africa's Protection of Personal Information Act (POPIA)
- The General Data Protection Regulation (GDPR)
- The California Consumer Privacy Act (CCPA), as amended by the California Privacy Rights Act (CPRA)
- The California Online Privacy Protection Act (CalOPPA)

This Privacy Policy explains how we collect, use, disclose, and safeguard your information when you use any of our Apps.

1. Information We Collect

We collect only the minimum information necessary to operate and improve each App. Not every App collects every category below — see the App's store listing or in-app notices for what applies to that specific experience.

A. Information You Provide



We may collect:

- First name (if voluntarily provided)
- Age (if voluntarily provided)
- Email address (if you contact us directly)
- Donation information (processed by third-party providers, where an App supports donations)

We do not require account creation to use most of our Apps.

B. Automatically Collected Information

When you use an App, we may automatically collect:

- Device type and operating system
- App version
- Anonymous usage statistics
- Crash reports
- General location (country or region only, not precise GPS)

We do not collect precise geolocation data.

C. AI and Voice Interaction Data

Some Apps include conversational AI or voice-driven features. Where this applies:

- User inputs (text or voice) may be processed by a secure third-party AI service provider.
- We do not use conversations to identify individual users.
- Conversations may be stored temporarily for safety, moderation, and service improvement purposes.
- We do not use conversation data to market to you.

2. How We Use Your Information

We use collected information to:

- Operate and improve our Apps
- Provide interactive and, where applicable, AI-powered experiences
- Ensure safety and moderation
- Respond to user inquiries
- Process donations, where applicable
- Comply with legal obligations



We do not sell personal information.

3. Legal Basis for Processing (GDPR & POPIA)

We process personal information based on:

- Your consent (e.g., voluntary submissions)
- Performance of a service requested by you
- Compliance with legal obligations
- Legitimate interests (such as improving and securing our Apps)

4. Sharing of Information

We may share information with:

- AI service providers (for conversational or voice processing, where applicable)
- Analytics providers (for anonymous usage statistics)
- Donation/payment processors, where applicable
- Legal authorities if required by law

All third-party providers are required to implement appropriate security safeguards. We do not sell or rent personal information.

5. International Data Transfers

As we operate internationally, your information may be processed in countries outside South Africa or your country of residence. Where required, we use appropriate safeguards such as:

- Standard Contractual Clauses (GDPR)
- Data processing agreements
- Service providers with adequate protection measures

6. Data Retention

We retain personal information only as long as necessary to:

- Provide the relevant App's functionality
- Comply with legal requirements
- Maintain security and integrity



Anonymous analytics data may be retained longer.

7. Your Rights

Depending on your location, you may have the right to:

- Access your personal information
- Request correction
- Request deletion
- Restrict or object to processing
- Withdraw consent
- Request data portability
- Opt out of sale or sharing (we do not sell data)

California Residents — Under CCPA/CPRA, you may request disclosure of collected information, deletion of personal information, and confirmation that we do not sell data.

EU/UK Residents — Under GDPR, you may lodge a complaint with your supervisory authority.

South African Residents — Under POPIA, you may lodge a complaint with the Information Regulator (South Africa).

To request deletion of your data or exercise any other right, contact us at: info@habitatxr.com with the subject line "Data Request," specifying the App name and the request type. We will respond within a reasonable timeframe as required by applicable law.

8. Children's Privacy

Our Apps are designed for general audiences and may be used by children under parental supervision. We do not knowingly collect personal information from children under 13 (or the equivalent age under applicable law) without parental consent. If we become aware that such data has been collected without consent, we will delete it promptly.

9. Security

We implement appropriate technical and organisational measures to protect personal information against unauthorised access, loss, misuse, and alteration. However, no digital platform can guarantee absolute security.



10. Third-Party Links

Our Apps may contain links to third-party websites (e.g., donation platforms). We are not responsible for their privacy practices.

11. Changes to This Policy

We may update this Privacy Policy periodically. Updates will be posted within the App(s) and/or on our website with a revised effective date.

12. Contact Information

Habitat XR / Habitat Nature Parks Foundation NPC Johannesburg, South Africa

Email: info@habitatxr.com Website: <https://www.habitatxr.com>

