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PRIVACY POLICY

NET1PRIVPOL1

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CONTENTS

1	Policy Statement.....	3
1.1	Definitions and key terms	3
1.2	What Information Do We Collect?	6
1.3	Do we share the information we collect with third parties?	7
1.4	Where and when is information collected from customers and end users?.....	8
1.5	How Long Do We Keep Your Information?	9
1.6	How Do We Protect Your Information?	9
1.7	Affiliates	10
1.8	Governing Law	10
1.9	CUSTOMER’S Consent.....	11
1.10	Links to Other Websites.....	11
1.11	Cookies.....	12
1.12	Remarketing Services	12
1.13	Changes To Our Privacy Policy	13
1.14	Third-Party Services.....	13
1.15	Sessions	14
1.16	Policy Review.....	14
1.17	Contact Us.....	15

1 POLICY STATEMENT

NetOne Cellular (Private) Limited (“we,” “our,” or “us”) is committed to protecting the privacy of all our stakeholders. This Privacy Policy explains how personal information is collected, used, and disclosed by NetOne Cellular (Pvt) Ltd.

This Privacy Policy shall apply to NetOne’s website, mobile apps, social media handles, Chabot, and their associated subdomains (collectively, our “Service”), as well as our application, NetOne. By accessing or using NetOne services, customers acknowledge that they have read, understood, and agreed to the collection, storage, use, and disclosure of their personal information as described in this Privacy Policy.

1.1 DEFINITIONS AND KEY TERMS

To ensure clarity in this Privacy Policy, we have defined each of these terms precisely as follows:

Cookie: small amount of data generated by a website and saved by customer’s web browser. It is used to identify customer’s browser, provide analytics, remember information about the customer such as the customer’s language preference or login information.

Company: when this policy mentions “Company,” “we,” “us,” or “our,” it refers to NetOne Cellular (Private) Limited (domiciled at 16th Floor Kopje Plaza, No. 1 Jason Moyo Avenue, Harare, Zimbabwe), that is responsible for customers’ information under this Privacy Policy.

Country: where NetOne Cellular (Private) Limited or the owners/founders of NetOne are based, in this case Zimbabwe.

Customer: refers to the company, organization or person that signs up to use the NetOne Cellular (Private) Limited Service.

Device: any internet connected device such as a phone, tablet, computer or any other device that can be used to visit NetOne and use the services.

IP address: Every device connected to the Internet is assigned a number known as an Internet protocol (IP) address. These numbers are usually assigned in geographic blocks. An IP address can often be used to identify the location from which a device is connecting to the Internet.

Personnel: refers to those individuals who are employed by NetOne Cellular (Pvt) Ltd or are under contract to perform a service on behalf of one of the parties.

Personal Data: any information that directly, indirectly, or in connection with other information — including a personal identification number — allows for the identification or identifiability of a natural person.

Service: refers to the service provided by NetOne Cellular (Pvt) Ltd as described in the relative terms (if available) and on this platform.

Third-party service: refers to advertisers, contest sponsors, promotional and marketing partners, and others who provide content or whose products or services that NetOne thinks may interest its customers.

Application programming interface (API): refers to a set of rules and protocols that allows different software applications to communicate with each other. APIs define how requests and responses should be structured so that systems can exchange data or functionality smoothly.

Disk on Module (DOM): is a compact solid-state storage device that connects directly to a computer's motherboard.

Hypertext Transfer Protocol (HTTP) is the foundation of data communication on the web. It's a protocol that defines how messages are formatted and transmitted, and how web servers and browsers should respond to various commands.

International Organization for Standardization (ISO) - sets the rules that help companies and industries ensure their products or services are safe, reliable, and of good quality.

International Electrotechnical Commission (IEC): It is a global organisation that prepares and publishes international standards for electrical, electronic, and related technologies.

Group Chief Executive Officer (GCEO): is the highest-ranking executive in a corporate group or conglomerate, responsible for overseeing the overall operations, strategy, and performance of all companies within the group.

Global Positioning System (GPS): is a satellite-based navigation system that provides location and time information anywhere on or near the Earth, as long as there is an unobstructed line of sight to four or more GPS satellites.

Short Message Service (SMS): is a text messaging service that allows users to send and receive short text messages between mobile phones.

1.2 WHAT INFORMATION DO WE COLLECT?

NetOne shall collect information from customers when they register on NetOne site or perform various transactions such as purchasing airtime or a bundle. Here are the details that NetOne requests:

Name / Username

Phone Numbers

Email addresses

National ID Number

Date of Birth

Residential Address

Call Records

Recharge Records

OneMoney Transactional Records

NetOne's application shall have permission to access for the following applications on customer's phone for a better user experience, these features shall be completely optional: to be enabled or disabled by the customers.

Location (GPS): Location data helps to create an accurate representation of customer's interests, and this can be used to bring more targeted and relevant advertisements to customers by NetOne ONLY. No information regarding the customer will be shared with third-parties

Phonebook (Contacts list): Customer's contacts list allows the platform to be much more user friendly, since accessing customer's contacts from the app helps the customers to save tons of time.

Camera (Pictures): Granting camera permission allows customer to upload any picture straight to the platform. Customer can safely deny camera permissions for this platform.

1.3 DO WE SHARE THE INFORMATION WE COLLECT WITH THIRD PARTIES?

NetOne Cellular (Pvt) Ltd shall engage third-party service providers to perform functions and provide services to NetOne, such as hosting and maintaining NetOne servers and the website/app, database storage and management, e-mail management, storage marketing, credit card processing, customer service and fulfilling orders for products and services that customer may purchase through the website/app. In the event that customers' personal information is shared with these third parties, appropriate technical and organizational controls shall be put in place and as well as a Data Processing Agreement signed to ensure the protection of all data.

NetOne Cellular (Pvt) Ltd shall share portions of log file data, including IP addresses, for analytics purposes with third parties such as web analytics partners, application developers, and ad networks. If such data is shared, it may be used to estimate general location and other technographic data such as connection speed, whether customers have visited the website/app in a shared location, and type of the device the customers used to visit the website/app.

NetOne shall also be obliged to disclose personal and non-personal information about a customer to government or law enforcement officials or private parties as, in the organization's sole discretion, where it believes it may be necessary or appropriate to respond to claims, for legal proceedings (including subpoenas), to protect the organization's rights and interests or those of a third party, for the safety of the public or any person, to prevent or stop any illegal, unethical, or legally actionable activity, or to otherwise comply with applicable court orders, laws, rules and regulations.

1.4 WHERE AND WHEN IS INFORMATION COLLECTED FROM CUSTOMERS AND END USERS?

NetOne Cellular (Pvt) Ltd shall collect personal information that customers submit and shall also receive personal information about a customer from third parties above.

How Do We Use The Information We Collect?

Any of the information collected by NetOne Cellular (Pvt) Ltd from customers shall be used by NetOne ONLY in one of the following ways:

- To personalize customers' experience (customer's information helps NetOne to respond better to individual needs)
- To improve NetOne's website/app (NetOne continually strive to improve its website/app offerings based on the information and feedback we receive from customers)
- To improve customer service (customer information helps NetOne Cellular (Private) Limited to more effectively respond to customer service requests and support needs)
- To process transactions
- To administer a contest, promotion, survey or other site feature
- To send periodic emails

How Does NetOne Use Customers' Email Address?

When a customer submits their email address on NetOne's website/app, customer shall be requested to receive or not to receive emails from NetOne. Customer can cancel their participation in any of these email lists at any time by clicking on the opt-out link or unsubscribe option that is included in the respective email. NetOne shall only send emails to people who have authorized NetOne to contact them, either directly, or through a third party. NetOne shall

not send unsolicited commercial emails, because NetOne hates spam as much as customers do. By submitting their email address, customers also agree to allow NetOne to use customers' email addresses for customer audience targeting on sites like Facebook, where NetOne displays custom advertising to specific people who have opted-in to receive communications from NetOne. Email addresses submitted only through the order processing page will be used for the sole purpose of sending customer information and updates pertaining to customers' order. If, however, customer has provided the same email to NetOne through another method, we shall use it for any of the purposes stated in this Policy. Note: If at any time the customer wants to unsubscribe from receiving future emails, NetOne include detailed unsubscribe instructions in of each email.

1.5 HOW LONG DO WE KEEP YOUR INFORMATION?

NetOne shall keep customer information only for as long as needed to provide services to customer and fulfill the purposes described in this policy. The same applies when NetOne shares customers' information with 3rd party entities that carry out services on NetOne's behalf. When NetOne no longer requires the customer's information and there is no need for NetOne to keep it in order to comply with legal or regulatory obligations, NetOne shall either securely remove it from its systems or depersonalize it so that NetOne cannot identify the customers.

1.6 HOW DO WE PROTECT YOUR INFORMATION?

NetOne shall implement a variety of security measures to maintain the safety of customer's personal information when they purchase airtime or a bundle or enter, submit, or access customers' personal information. All supplied sensitive/credit information shall be transmitted via Secure Socket Layer (SSL) technology and then encrypted into NetOne Payment gateway providers' database only to be accessible by those authorized with special access rights to such systems and are required to keep the information confidential. After a

transaction, customers' private information (NetOne or OneMoney number and other financials) is never kept on file.

Is the Information collected through the NetOne Cellular Pvt (Ltd) Service secure?

NetOne shall take precautions to protect the security of customers' information. NetOne shall have physical, cyber/electronic, and administrative procedures to help safeguard, prevent unauthorized access, maintain data security, and correctly use your information.

1.7 AFFILIATES

NetOne shall disclose information (including personal information) about customers to NetOne Corporate Affiliates. For purposes of this Privacy Policy, "Corporate Affiliate" means any person or entity which directly or indirectly controls, is controlled by or is under common control with NetOne, whether by ownership or otherwise. Any information relating to customers that NetOne provide to our Corporate Affiliates will be treated by those Corporate Affiliates in accordance with the terms of this Privacy Policy.

1.8 GOVERNING LAW

This Policy shall be governed by the laws of Zimbabwe in particular the CYBER AND DATA PROTECTION ACT [CHAPTER 12:07], all guidance, guidelines, codes of practice and codes of conduct issued by Regulator, authority or body responsible for administering Data Protection Laws.

This Privacy Policy shall be governed by the laws of Zimbabwe without regard to its conflict of laws provision. Customers consent to the exclusive jurisdiction of the High Court of Zimbabwe in connection with any action or dispute arising between the parties under or in connection with this Privacy Policy.

1.9 CUSTOMER'S CONSENT

Customer's Choices:

If customer does not wish to consent to the collection and use of their data as described in this Privacy Policy, customer shall opt out or adjust their preferences in customer's account settings.

Data subject's rights

Customers have rights regarding personal data, as outlined by data protection laws, subject to legal and contractual exceptions. Outlined below is a summary of data subject rights:

Right to Access: Customer shall request copies of their personal data.

Right to Rectification: Customer shall ask NetOne to correct any inaccurate information or to complete any incomplete information about the customer.

Right to Erasure: Customer shall have the right to request the deletion of their personal data under certain conditions.

Right to Restrict Processing: Customer shall request that NetOne limits the processing of their personal data under specific circumstances which customer shall specify in writing.

Right to Object to Processing: Customers shall have the right to object to NetOne's processing of their personal data.

1.10 LINKS TO OTHER WEBSITES

This Privacy Policy applies only to the Services offered by NetOne. The Services shall contain links to other websites not operated or controlled by NetOne Cellular (Pvt) Ltd. NetOne shall not be responsible for the content, accuracy or opinions expressed in such websites, and such websites are not investigated, monitored or checked for accuracy or completeness by NetOne. Customers are urged to remember that when they use a link to go from the Services to another

website, the NetOne Privacy Policy is no longer in effect. Customer's browsing and interaction on any other website, including those that have a link on NetOne's platforms, is subject to that website's own rules and policies. Such third parties may use their own cookies or other methods to collect information about the customer.

1.11 COOKIES

NetOne shall use "Cookies" to identify the areas of its website/app that the customer has visited. A cookie is a small piece of data stored on the customer's computer or mobile device by customer's web browser. NetOne shall use cookies to enhance the performance and functionality of its website/app but are non-essential to their use. However, without these cookies, certain functionality like videos may become unavailable or customer would be required to enter their login details every time a customer visit the website/app as NetOne would not be able to remember that customer had logged in previously. Most web browsers can be set to disable the use of cookies. However, if customer disable cookies, customer may not be able to access functionality on NetOne website/app correctly or at all. NetOne shall never place Personally Identifiable Information in Cookies.

1.12 REMARKETING SERVICES

NetOne shall use remarketing services whereby remarketing (or retargeting) refers to the practice of serving ads across the internet to people who have already visited NetOne's website/app. It allows customer to continues seeing NetOne advertisements on other websites that permit third-party advertising. This can be helpful as it serves as a reminder of the services NetOne offers.

Payment Details

In respect of any credit card or other payment processing details customer will have provided NetOne, NetOne shall commit to ensure that confidential information is stored in the most secure manner possible.

1.13 CHANGES TO OUR PRIVACY POLICY

NetOne shall change its service and policies and may be required to update and make changes to this Privacy Policy so that they accurately reflect NetOne services and policies. Unless otherwise required by law, NetOne shall notify customer (for example, through SMS or email) before NetOne makes changes to this Privacy Policy. Then, if the customer continues to use the Service, customer shall be bound by the updated Privacy Policy.

1.14 THIRD-PARTY SERVICES

NetOne shall display, include or make available third-party content (including data, information, applications and other products services) or provide links to third-party websites or services ("Third- Party Services").

It should be noted that NetOne shall not be responsible and liable for any Third-Party Services stemming from NetOne website (not directly linked to customer's data processing), including their accuracy, completeness, timeliness, validity, copyright compliance, legality, decency, quality or any other aspect thereof.

Third-Party Services and links thereto are provided solely as a convenience to customers and one has to use them entirely at their own risk and subject to such third parties' terms and conditions.

Facebook Pixel

NetOne Cellular (Private) Limited shall use Facebook Pixel to enhance customers' experience. Facebook Pixel is an analytics tool that helps NetOne evaluate the effectiveness of NetOne's advertising by tracking the actions users take on NetOne website or app. With Facebook Pixel, NetOne ensures that its advertisements are delivered to the most relevant audience.

It is important to note that Facebook Pixel may gather information from customers' device when customers use our services. Any data collected by Facebook Pixel is managed in compliance with Facebook Privacy Policy.

Tracking Technologies

NetOne shall make use of the following technologies to better serve customers.

Google Maps API

Google Maps API is a robust tool that can be used to create a custom map, a searchable map, check-in functions, display live data syncing with location, plan routes, or create a mashup just to name a few.

Local Storage

Local Storage sometimes known as DOM storage, provides web apps with methods and protocols for storing client-side data. Web storage supports persistent data storage, similar to cookies however with a greatly enhanced capacity and no information stored in the HTTP request header.

1.15 SESSIONS

NetOne shall use "Sessions" to identify the areas of NetOne's platform that customers have visited. A Session is a small piece of data stored on customers' computer or mobile device by customers' web browser.

1.16 POLICY REVIEW

This policy shall be reviewed at least once every year and anytime to ensure compliance with the laws of Zimbabwe.

1.17 CONTACT US

Don't hesitate to contact us if you have any questions:

- Via Email: privacy@netone.co.zw
- Via Tollfree Phone Number: 123
- Via this Link: netone.co.zw/contact
- Via this Address: NetOne Cellular (Private) Limited 16th Floor Kopje building, 1 Jason Moyo Avenue, Harare, Zimbabwe