

PRIVACY STATEMENT

1. POLICY STATEMENT - PURPOSE AND COMMITMENT

NetOne Financial Services (Private) Limited ("OneMoney", "OneMoney", "we", "us" or "our") respects the privacy and security of personal information. This Privacy Statement explains how we collect, use, disclose, retain and protect personal information when you use OneMoney services, including our applications, websites, customer channels and related digital services. By using OneMoney services, customers acknowledge that they have read and understood this Privacy Statement.

This Statement is read together with applicable terms and conditions and does not limit any statutory or regulatory obligation applicable to OneMoney.

2. WHO WE ARE

OneMoney is the data controller for personal information processed for the purposes described in this Statement, except where another person is independently responsible for a particular processing activity.

Data Protection Officer: Tafadzwa Dzveya

Email: tdzveya@netone.co.zw

Telephone: 263712980901

Address: 16th Floor Kopje Plaza, No. 1 Jason Moyo Avenue, Harare, Zimbabwe.

3. SCOPE

This Statement applies to personal information processed through OneMoney websites, mobile applications, social-media channels, chatbot/customer-support channels and associated services. Separate notices may apply where a specific product or processing activity requires additional information.

4. PERSONAL INFORMATION WE COLLECT

Category	Examples	Purpose	Status
Identity/Know Your Customer (KYC)	Name, National ID, date of birth, address	Identity verification, KYC/Customer Due Diligence (CDD), financial crimes and legal compliance	Generally mandatory
Contact	Mobile number, email	Service and regulatory communications	Generally mandatory
Transactions	Wallet and payment records	Transactions, accounting, monitoring, financial crimes compliance (including Anti-Money Laundering (AML), Counter Financing of Terrorist and Counter Proliferation Financing)	Mandatory where applicable
Device/technical	IP address, device identifiers, logs	Security, diagnostics, fraud prevention and service operation	Generally required
Images/documents	Images and documents uploaded through the mobile app	KYC, verification and customer-requested services	As applicable
Marketing/preferences	Communication preferences and interaction data	Marketing where lawfully permitted	Optional for marketing

5. HOW WE COLLECT INFORMATION

We may collect information directly from you, automatically from your device or use of our services, and from third parties where lawful and necessary. Third-party sources may include banks, payment partners, service providers, fraud-prevention providers, regulators, public authorities and other lawful sources.

6. PURPOSES OF PROCESSING

- ✓ Providing and administering OneMoney services and transactions;
- ✓ Customer identification, verification and account administration;
- ✓ Fraud prevention, cybersecurity and protection of customers and OneMoney;
- ✓ AML/CFT/CPF compliance, including customer due diligence and enhanced due diligence
- ✓ Transaction monitoring, risk assessment and detection of suspicious or unusual activity
- ✓ Politically Exposed Persons (PEP), sanctions and other financial-crime screening
- ✓ Meeting legal, regulatory, tax, accounting and reporting obligations
- ✓ Responding to lawful requests, court orders and regulatory/law-enforcement requirements
- ✓ Customer support, complaints, disputes and service improvement
- ✓ Security, audit, testing, quality assurance and business continuity
- ✓ Marketing, analytics, cookies, profiling or remarketing where legally permitted and, where required, based on consent

7. LEGAL BASIS FOR PROCESSING

Depending on the circumstances, processing may be based on performance of a contract, compliance with a legal or regulatory obligation, consent, protection of vital interests, establishment/exercise/defence of legal claims, public-interest grounds or another lawful basis recognised by applicable law. Consent will not be requested where processing is required by law or is otherwise lawful without consent.

Where consent is relied upon, it will be specific, informed, freely given and capable of being withdrawn. Withdrawal does not affect processing already lawfully undertaken and does not prevent continued processing where another lawful basis applies. Consent will be recorded through explicit opt-in mechanisms (e.g., tick-box, digital signature). Customers may withdraw consent at any time via various means inclusive of in store, DPO contact, and official OneMoney communication channels with provision for withdrawal mechanism and withdrawal will be logged with a timestamp.

8. AML/CFT/CPF AND FINANCIAL-CRIME COMPLIANCE

As a regulated financial-services provider, OneMoney is required to process customer and transaction information to comply with applicable AML/CFT/CPF laws and regulatory requirements. This may include customer due diligence, enhanced due diligence, beneficial ownership information where applicable, transaction monitoring, sanctions and PEP screening, high risk jurisdiction screening, risk classification, investigation of unusual activity and reporting to competent authorities.

OneMoney may be legally required to retain records and may be restricted from informing a customer about certain investigations, suspicious transaction reports or related regulatory processes. Data-subject rights may therefore be limited where necessary to comply with applicable law or to prevent tipping-off.

9. DISCLOSURE OF PERSONAL INFORMATION

OneMoney may disclose personal information where lawful and necessary to provide services, fulfil legal or regulatory obligations, prevent fraud or crime, protect rights and safety, or establish, exercise or defend legal claims.

Recipient	Examples of purpose
Service providers/processors	Hosting, technology, support, storage, communications and contracted services
Financial/payment partners	Payment processing, settlement, verification and related services
Regulators/competent authorities	Fulfilling regulatory requirements such as those required by the Reserve Bank of Zimbabwe (RBZ), Data Protection Authority/Postal and Telecommunications Authority of Zimbabwe (POTRAZ), Financial Intelligence Unit (FIU) and other lawful regulatory purposes
Law enforcement/courts	Investigations, court orders and lawful enforcement
Professional advisers/auditors	Legal, audit, assurance and professional services subject to confidentiality
Corporate affiliates	Permitted operational/group purposes subject to applicable safeguards

Where a recipient acts as a data processor, OneMoney will require appropriate contractual, technical and organisational safeguards. Where a recipient is independently responsible for its processing, its own lawful processing responsibilities may apply.

10. CROSS-BORDER TRANSFERS

Some service providers or recipients may process personal information outside Zimbabwe. OneMoney will only transfer personal information outside Zimbabwe in accordance with applicable law, including requirements concerning adequacy, safeguards, consent or other permitted grounds. OneMoney will consider the nature of the information, purpose, recipient, destination, security measures and applicable legal protections.

11. DATA RETENTION

OneMoney retains personal information only for as long as necessary for the relevant purpose, subject to legal, regulatory, contractual, dispute, audit, security and record-keeping requirements. Customer-identification, transaction, AML/CFT/CPF and other records will be retained for periods required by applicable law.

When information is no longer required and there is no lawful reason for continued retention, it will be securely deleted, anonymised or otherwise disposed of in accordance with OneMoney retention procedures. Nothing in this Statement means that transaction or customer records are immediately deleted after a transaction where applicable law requires retention.

12. INFORMATION SECURITY

OneMoney applies appropriate technical, physical and organisational measures designed to protect personal information against unauthorised access, alteration, disclosure, loss, destruction and other unlawful or accidental processing. Measures may include access controls, authentication, encryption where appropriate, logging and monitoring, secure development, segregation of duties, confidentiality obligations, backups, vulnerability management and incident response.

No method of transmission or storage can be guaranteed to be completely secure. OneMoney continually reviews and improves its security measures.

13. PERSONAL DATA BREACHES

OneMoney maintains procedures for identifying, assessing, containing, investigating and remediating personal-data security incidents. Where a breach is subject to mandatory notification, OneMoney will notify the relevant authority within the period prescribed by law and notify affected data subjects where required or otherwise appropriate under applicable law.

14. DATA SUBJECT RIGHTS, COMPLAINTS AND ESCALATIONS

Subject to applicable legal exceptions and limitations, data subjects may have rights to access their personal information, request correction of inaccurate or incomplete information, request deletion where legally permissible, object to or restrict certain processing, and withdraw consent where consent is the basis for processing.

Requests may be submitted through the DPO contact details above. OneMoney may require reasonable identity verification. Rights may be restricted where processing or retention is required by law, necessary for regulatory compliance, financial crimes prevention, legal claims, investigations or other lawful purposes.

OneMoney will acknowledge data subject rights requests within 2 business days and provide a substantive response within 30 days, unless restricted by law (e.g., AML/CFT obligations). Where an extension is necessary, customers will be informed of the reason and expected timeframe.

Customers may first raise privacy concerns with OneMoney through the DPO/privacy contact channel. Nothing in this Statement prevents a data subject from lodging a complaint with the Data Protection Authority or another competent authority in accordance with applicable law.

15. COOKIES, ANALYTICS AND TRACKING

OneMoney may use cookies, sessions, local storage and similar technologies for essential service functionality, security, preferences, analytics and other disclosed purposes. Where non-essential tracking requires consent, the relevant preference will be requested and can be managed through available controls.

OneMoney may use third-party analytics, mapping, advertising or remarketing technologies. These providers may process technical or other information under applicable contractual arrangements and their own privacy notices.

16. LOCATION AND CONTACTS

Location information and access to device contacts are optional where technically possible and are used only for disclosed purposes. Location data may be used for functionality, security or, where separately permitted, marketing. Contact-list access supports customer-initiated functionality. Customers may disable optional permissions through device settings, subject to any effect on functionality.

17. CHILDREN

OneMoney will process children's personal information only where permitted by applicable law and with appropriate safeguards. Where parental or guardian consent is legally required, OneMoney will implement appropriate verification and consent measures. OneMoney does not knowingly collect children's information for unnecessary marketing purposes.

18. AUTOMATED DECISION-MAKING AND PROFILING

OneMoney may use automated tools for fraud/AML/CFT/CPF detection, security, risk assessment, transaction monitoring, screening and service personalisation. Where automated processing produces a decision with legal or similarly significant effects, OneMoney will apply safeguards required by law and provide appropriate information. Customers will not be subject to decisions based solely on automated processing, including profiling, unless such processing is necessary for contract performance, authorised by law with safeguards, or based on explicit consent. In such cases, customers will be informed of the logic involved and may request human intervention.

19. THIRD-PARTY WEBSITES AND SERVICES

OneMoney may contain links or integrations to third-party services. Once a customer leaves OneMoney-controlled services, the third party's privacy terms may apply. OneMoney is not responsible for independent third-party processing except to the extent required by applicable law or contractual responsibility.

20. CHANGES TO THIS PRIVACY STATEMENT AND CUSTOMER AWARENESS

OneMoney may update this Statement to reflect changes in services, technology, law or regulatory requirements. Where required or appropriate, material changes will be communicated to customers before they take effect, or as soon as reasonably practicable where immediate implementation is required by law, regulation or security considerations.

21. GOVERNING LAW

This Statement is governed by the laws of Zimbabwe, including the Cyber and Data Protection Act [Chapter 12:07], applicable regulations and guidance, and other laws applicable to OneMoney's activities. Nothing in this Statement limits mandatory rights or obligations under applicable law.

In addition to obligations under the Cyber and Data Protection Act, OneMoney will comply with the Money Laundering and Proceeds of Crime Act [Chapter 9:24] and regulations issued by the Reserve Bank of Zimbabwe and the Financial Intelligence Unit. This includes timely filing of Suspicious Transaction Reports (STRs) to the Financial Intelligence Unit, sanctions screening, and retention of records for as required by law. Customer identification, transaction, AML/CFT/CPF and related records will be retained for at least the statutory minimum period applicable to the relevant category of record, including any longer period required by law, regulatory direction, investigation or legal proceedings.

22. CONTACT US

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

- ✓ Via Email: privacy@netone.co.zw
- ✓ Via Toll-free Phone Number: 121, 123
- ✓ Via this Address: NetOne Cellular (Private) Limited 16th Floor Kopje building, 1 Jason Moyo Avenue, Harare, Zimbabwe