

## **Massmart Zambia Operations Privacy Statement**

In this statement, Massmart, ("we", "us" or "the Company") refers to Massmart Holdings (Proprietary) Limited and any other company that forms part of the Massmart corporate group of companies operating in Zambia. It is our promise to all our business stakeholders (referred to as data subjects in the law), which includes our prospective, current and former customers, service providers, sellers, suppliers, affiliates and employees, to respect the trust they place in us and their personal information they share with us. Through this policy statement, we aim to inform our business stakeholders in a clear, transparent, and simple way- how we collect, use, share, store ("Processing") and/or protect their personal information and to address their rights in this regard.

We will only process personal information in compliance with applicable laws, including the Zambia Data Protection Act, 3 of 2021.

We will only collect personal information that is necessary for specific purposes required. We will inform you when we require your personal information whether it is mandatory or voluntary to provide. We may collect and use/process the following type of personal information. This is not an exhaustive list and not all categories may be relevant to all our relevant stakeholders as it will depend on the purpose for which we need to receive and process the personal information for a specific business stakeholder.

- Personal identifiers, such as name, contact details, address, age, date of birth, nationality, gender and race;
- Device and online identifiers and related information;
- Internet, application, and network activity, such as cookies, browser visits and use of our networks;
- Government identifiers, such as registration numbers, national identification numbers and driver's license numbers;
- Credit Bureau information;
- Financial information, such as annual financial statements, bank statements, credit and debit card numbers and claims information;
- Purchase history information, such as products our customers have bought, rented, and returned;
- Payment-related information;
- Certifications and Know Your Customer (KYC) documentation;
- Location information, such as geo-location to confirm our closest store or facility;
- Ratings and reviews of our products and/or services by our customers and/or third parties;
- To ensure the safety and security of our visitors, suppliers, suppliers and assets, closed circuit television and cameras may be used throughout Massmart facilities. These devices can capture and store your images and the information will only be used and retained for legitimate business and legal purposes.
- By using our websites, mobile applications, Wi-Fi and/ or by sharing your personal information with us at any of our home offices, we collect and use your personal information for the purposes outlined in this Policy.
- Family, membership and health-related information of our employees.

### **Collection of Personal Information**

All Personal Information which you share with us will be used only for the purposes for which it is collected.

We collect information from you for business or legally required (for example financial, labour, health and safety laws) purposes, in a variety of ways, with your prior consent. It may be:

- Provided directly by you or your representative;
- Collected from a device associated with you and/or your business's devices associated with your profile;
- Collected through in-store or facility technology such as security cameras and scanners;

- Collected through any cookies or website tag management tool on our website and/or seller portal as specified in such platforms;
- Collected from other companies within our Massmart Group of Companies;
- Collected from other parties such as Credit Bureaus and Government Institutions

We will take reasonable steps to ensure that information is as accurate, complete and updated. We require that you notify us from time to time in writing of any updates required in respect of your personal information.

### **Use/Processing and Storing of Personal Information**

We will use the personal information for product, service, transactional, support, procurement, marketing, surveys, technical support, management, audit or review and legal or regulatory compliance purposes, as allowed for or prescribed by law.

We may process your personal information to prepare any legal or potential legal claim or defence necessary to protect the interests of Massmart and our affiliates.

We will only store and keep personal information as required or allowed for by law or where you have provided us with consent to keep your personal information for a longer period.

### **Sharing of Personal Information**

The personal information that we collect may be shared with other companies, including those within our corporate group of companies and our holding company, for a legitimate business or other legally allowed purposes.

#### Sharing with Third Parties

From time to time, Massmart may utilize external third parties to administer or assist with certain functions, programs, benefits, or administrative functions on its behalf. We will require our third parties to keep your personal information secured and confidential and to process it in accordance with the law. In addition, your personal information may be shared during business transfers. Where all or a part of our business is merged, sold or reorganized, personal information about you could be shared with the business successor.

#### Sharing for Legal Requirements and Protection of Massmart and Others

We may share your personal information where sharing is required by law, or we believe sharing will help to protect your personal information, property or rights of Massmart, for example:

- Protecting your health or safety including that of your employees, sub-contractors;
- Addressing crimes committed on Massmart property;
- Identifying and addressing fraud or financial risk;
- Providing personal information to law enforcement at their written request; or
- Responding to a search warrant or other valid legal inquiry.

#### Transfer outside of the borders of the country

Where we need to transfer your personal information outside of the borders of the country, we will ensure that the transfer of the personal information is done in a manner prescribed by the data privacy and protection law.

#### Our commitment:

We will use all reasonable measures to ensure that recipients of your personal information protect and process your information in accordance with legal or contractual requirements.

#### **Securing and Access to your Personal Information**

The security and confidentiality of your personal information is important to us. Massmart takes appropriate technical, organizational, and legal steps to protect your personal information.

Access to your personal information is restricted to only those persons who need access to the personal information to perform a specific function or task.

Whilst we will do all things reasonably necessary to protect your personal information, we cannot guarantee nor do we accept any liability of whatsoever nature for any unauthorized or unlawful disclosure and/or use of your personal information, either by employees and/or made by any third parties (including third party service providers) who are not subject to our control, unless such disclosure and/or use is as a result of our gross negligence.

#### **Your Rights**

You have the right to make a request to access the information we hold on you and correct, amend, delete, restrict or port your personal information, and to object to how your personal information is processed.

To exercise your data subject rights please email us at [pirequest@massmart.co.za](mailto:pirequest@massmart.co.za).

In addition, you may object cancel or correct modify the email or telephonic communications you have chosen to receive from us.

If you have any questions concerning your personal information or how to exercise these rights, contact us at [info.officer@massmart.co.za](mailto:info.officer@massmart.co.za).

You also have the right to lodge a complaint with the Zambia Data Protection Commission. You can email the Zambia Data Protection Commission with your complaint/query at [enquiries@dataprotection.gov.zm](mailto:enquiries@dataprotection.gov.zm) or call them on (+260) 750 799 801

Visit their website for more details: <https://www.dataprotection.gov.zm/>

The Company reserves the right to amend this policy at any time. Our current updated Privacy Statement will be available on our website.

Massmart Holdings (Pty) Limited and it's relevant in country company.