

## Privacy Policy.

This Privacy Statement describes the ways in which we, Lwezi Technologies, collect, hold and use information about individual persons who utilise systems implemented and used by Lwezi Technologies.

### **Pledge on Privacy**

The term "Personal Data" as used in this Privacy Policy refers to information such as customers name, birth date, e-mail address, mailing address, physical address or telephone number that can be used to identify one customer from another. Generally, we will only process Personal Data as described in this Privacy Policy.

However, we reserve the right, to conduct additional processing to the extent permitted or required by law, or in support of any legal or criminal investigation.

The next sections explain how and when we collect Personal Data.

### **Intended use of Personal Data**

Some services may require customers to provide us with Personal Data. In these situations, if customers choose to withhold any Personal Data requested by us, it may not be possible for them to gain access to certain parts of Lwezi Technologies' sites/apps and for us to respond to their queries.

We may collect and use Personal Data to provide customers with products or services, to bill them for products and services they request, or to communicate with them for other purposes which are evident from the circumstances or about which we inform them when we collect their Personal Data.

### **Non-disclosure of Personal Data**

We will not sell, share, or otherwise distribute customers Personal Data to third parties except as provided in this Privacy Policy. Personal Data may be transferred to third parties who act for or on our behalf, for further processing in accordance with the purpose(s) for which the data were originally collected or may otherwise be lawfully processed, such as services delivery, evaluating the usefulness of the systems, marketing, data management or

technical support. These third parties have contracted with us to only use Personal Data for the agreed upon purpose, and not to sell customers Personal Information to third parties, and not to disclose it to third parties except as may be required by law, as permitted by us or as stated in this Privacy Policy.

Personal Data collected from customers may also be transferred to a third party in the event that Lwezi Technologies or a part of it and the customer data connected with it is sold, assigned or transferred, in which case we would require the buyer, assignee or transferee to treat Personal Data in accordance with this Privacy Policy. Also, Personal Data may be disclosed to a third party if we are required to do so because of an applicable law, court order or governmental regulation, or if such disclosure is otherwise necessary in support of any criminal or other legal investigation or proceeding here or abroad.

### **Right of Access, Correction and Objection**

Whenever we process Personal Data, we take reasonable steps to ensure that customers' Personal Data is kept accurate and up-to date for the purposes for which it was collected. We will provide customers with the ability to object to the processing of your Personal Data if such processing is not reasonably required for a legitimate business purpose as described in this policy or our compliance with law. Requests to delete personal data will be subject to any applicable legal and ethical reporting or document filing or retention obligations imposed on us.

### **Security and Confidentiality**

To ensure the security and confidentiality of Personal Data that we collect on systems, we use data networks protected, inter alia, by industry standard firewall and password protection. In the course of handling customers Personal Data, we take measures reasonably designed to protect that information from loss, misuse, unauthorized access, disclosure, alteration or destruction.

### **Data Transfer Abroad**

We utilise cloud hosting data centres in different countries, some of which are operated by third parties on behalf of Lwezi Technologies. We may transfer customers' data to one of the

Group's databases outside of a customer's country of domicile, but continue to treat the data in accordance with this policy.