

Thank you for accessing [www.mascom.bw](http://www.mascom.bw) (the "Site") operated by Mascom Wireless this Privacy Policy Statement sets out how Mascom collects, stores and handles personal information. We respect your privacy and want to protect your personal information. To learn more, please read this Privacy Policy.

This Privacy Policy explains how MASCOM WIRELESS collects, uses and (under certain conditions) discloses your personal information. By providing your Personal Information to us, you are consenting to this Privacy Policy and the collection, use, access, transfer, storage and processing of your personal information as described in this Privacy Policy. This Privacy Policy also explains the steps we have taken to secure your personal information. Finally, this Privacy Policy explains your options regarding the collection, use and disclosure of your personal information. By registering for the Mascom self-service app or accessing the Site directly you accept the practices described in this Policy.

Data protection is a matter of trust and your privacy is important to us. We shall therefore only use information which relates to you in the manner set out in this Privacy Policy. We will only collect information where it is necessary for us to do so and we will only collect information if it is relevant to our dealings with you.

We will only keep your information for as long as we are either required to by law or as is relevant for the purposes for which it was collected. You can visit the Site and browse without having to provide personal details.

## **1. DATA COLLECTION AND USE.**

In order for us to provide you with our Products and/or Services and to operate in an efficient and effective manner by providing you with the best service possible, we need to collect relevant personal information from you. The personal information collected by us may include (but is not limited to) the following:-

- contact information such as your name, date of birth, identification supporting documents (including copies of ID or Passport), gender, nationality and, email address
- your mobile phone location (to determine the closest MASCOM WIRELESS 's network connection point to enable connection to our network to make calls and/or access our mobile internet services)
- the status of the Products and/or Services you have acquired from us or subscribed to
- how you use the Products and/or Service (for example traffic data such as numbers and destinations of calls, SMS, emails and other communications made and received by you and the date, duration, time and cost of such communications)
- the amount of data that has been received and/or sent by you

- the equipment you use when accessing our Products and/or Services (such as your mobile handset, your computer system and platform) to customize the service for you
- your personal interests and preferences to help us tailor offerings of our Products and/or Services which would suit you best
- clickstream data when you visit any of our websites (for example the pages you access and the Services and/or Products you browsed)
- recording of your image via CCTV cameras when you visit our branches
- recording of calls placed by you to our help desk for our service enhancement and improvement

## 1. **How We Collect your Personal Information**

We may collect personal information directly from you when you:-

- communicate with us (for example when you submit an application form to become our customer, or when you contact us for any enquiries including by calling our customer service)
- register or subscribe for a specific Product and/or Service or our publications (for example, newsletters)
- use our network and other Products and/or Services of MASCOM WIRELESS
- participate in any of our surveys
- enter into or participate in any competitions, contests or loyalty programmes run/organized by us
- register interest and/or request for information of (through our online portals or other available channels) or subscribe to our Products and/or Services
- respond to any marketing materials we send out
- commence a business relationship with us (for example, as a service provider/business partner)
- visit any of our offices
- visit or browse our websites
- lodge a complaint with us
- provide feedback to us (for example via our websites or in hard copy)

Other than personal information obtained from you directly (as detailed above), we may also obtain your personal information from third parties we deal with or are connected with you (credit reference agencies or financial institutions), and from such other sources where you have given your consent for the disclosure of information relating to you, and/or where otherwise lawfully permitted.

## 2. **How We Use Your Personal Information**

We may collect and use personal information from you or from the category of third parties identified in this Privacy Policy, for one or more of the following purposes:-

- to verify your identity
- to assess and process your application(s) /request(s) for our Products and/or Services
- to provide you with the Products and/or Services you have requested
- to administer and manage the Products and/or Services we provide you (including charging, billing, facilitating payments and collecting debts)
- to investigate and resolve any service issues, billing queries, complaints or other enquiries that you submit to us regarding our network, Products and Services with our customer relations teams
- to assess and/or verify credit worthiness
- to detect and prevent fraudulent activity
- to manage our networks
- to keep in contact with you and provide you with any information you have requested
- to engage in business transactions in respect of Products and/or Services to be offered and provided to you
- to establish and better manage any business relationship we may have with you
- to process any communications you send us (for example, answering any queries and dealing with any complaints and feedback)
- to help us monitor and improve the performance of our network, Products and Services, our customer relations teams and service providers and the Site and to make these more efficient
- to maintain and develop our business systems and infrastructure, including testing and upgrading of these systems
- to manage staff training and quality assurance
- to notify you about benefits and changes to the features of our Products and/or Services
- to determine how can we improve services to you
- to produce data, reports and statistics which shall be anonymized or aggregated in a manner that does not identify you as an individual
- to investigate, respond to, or defend claims made against, or involving MASCOM WIRELESS
- to conduct marketing activities (for example, market research)
- to maintain records required for security, claims or other legal purposes
- to comply with legal and regulatory requirements
- for any other purposes that is required or permitted by any law, regulations, guidelines and/or relevant regulatory authorities

### 3. **Disclosure of Your Personal Information**

As a part of providing you with our Products and/or Services and the management and/or operation of the same, we may be required or need to disclose information about you to the following third parties:

- law enforcement agencies
- government agencies
- companies and/or organizations that act as our agents, contractors, service providers and/or professional advisers
- companies and/or organizations that assist us in processing and/or otherwise fulfilling transactions and providing you with Products and/or Services that you have requested or subscribed for
- our business associates and other parties for purposes that are related to the purpose of collecting and using your personal information
- other parties in respect of whom you have given your express or implied consent

Subject at all times to any laws (including regulations, guidelines and/or obligations) applicable to MASCOM WIRELESS.

#### **4. Direct Marketing**

We may use your personal information to provide you with information about our and third party services and/or products, which may be of interest to or benefit you, except where otherwise requested or notified by you. In certain instances, we may disclose your personal information to our preferred merchants and strategic partners. However, please note that we will only disclose your personal information to our merchants and strategic partners where you have subscribed for particular Services or Products which require such disclosure, and/or where your consent has been obtained, subject at all times to any laws (including regulations, guidelines and/or obligations) applicable to MASCOM WIRELESS. We take reasonable steps to ensure that our agreements with our merchants and/or strategic partners include appropriate privacy and confidentiality obligations.

#### **5. What If Personal Information Provided By You Is Incomplete?**

Where indicated (for example in registration/application forms), it is obligatory to provide your personal information to us to enable us to process your application for our Products and/or Services. Should you decline to provide such obligatory personal information, we may not be able to process your application or provide you with our Products and/or Services.

#### **6. Your Rights to Access and Correct Your Personal Information**

We can assist you to access and correct your personal information held by us. Where you wish to have access to your personal information in our possession, or where you are of the opinion that such personal information held by us is inaccurate, incomplete, misleading or where relevant, not up-to-date, you may make a request to us by contacting the MASCOM

WIRELESS's Customer Service Centre on 111 or 129 or physically visit any MASCOM WIRELESS service centre.

## **COOKIES**

We collect information about your use of our Site from cookies. Cookies are packets of information stored in your computer which assist your website navigation by customizing Site information tailored to your needs. Cookies in themselves do not identify the individual user, just the computer used. You are not obliged to accept cookies. If you are concerned, you can set your computer either to accept all cookies, to notify you when a cookie is issued, or not to receive cookies at any time. However, rejection of cookies may affect your use of our Sites as we will be unable to personalize aspects of your use of the Site.

**Links to third party websites** : Please be informed that this Privacy Policy applies solely to the Site and does not apply to any third party websites you may access from our Site. To determine how they deal with your Personal Information, you should ensure that you read their respective privacy policies.

### **3. TRANSFER OF YOUR PERSONAL INFORMATION OUTSIDE BOTSWANA**

It may be necessary for us to transfer your personal information outside Botswana if any of our service providers or strategic partners (overseas entities) who are involved in providing part of MASCOM WIRELESS Products and/or Services are located in countries outside Botswana or if you use the Products and/or Services from a country other than Botswana (for example, international roaming). You consent to us transferring your personal information outside Botswana in these instances. We shall take reasonable steps to ensure that any such overseas entities are contractually bound not to use your personal information for any reason other than to provide the Products and/or Services they are contracted by us to provide and to adequately safeguard your personal information.

### **4. SECURITY**

We have in place appropriate technical and security measures to prevent unauthorized or unlawful access to or accidental loss of or destruction or damage to your information. When we collect data through the Site, we collect your personal details on a secure server. We use firewalls on our servers. While we are unable to guarantee 100% security, this makes it hard for a hacker to decrypt your details.

### **5. UPDATES**

We reserve the right to amend this Privacy Policy from time to time and the updated version shall apply and supersede any and all previous versions, including but not limited to, leaflets or hard copy versions. Please check our Site for information on our most up-to-date practices.

## **6. YOUR OBLIGATIONS**

You are responsible for providing accurate and complete information to us about yourself and any other person whose personal information you provide us and for updating this personal information as and when it becomes incorrect or out of date by contacting the MASCOM WIRELESS's Customer Service Centre. This obligation is a condition to the provision of our Products and/or Services to you and/or any other person authorized or permitted by you or your organization/company to use the Products and/or Services. In the event you may need to provide us with personal information relating to third parties (for example about your spouse or children or where you are the designated person in charge (from an organization or company) for dealing with us, if you are acquiring and are responsible for a service and/or product that they will use), you confirm that you have (i) obtained their consent or otherwise entitled to provide their personal information to us and for us to use accordingly, and (ii) informed them to read this Privacy Policy on our Site or at any of our Service Centers.