



Data Protection and Privacy

MTN's position on Data Protection and Privacy

Our Data Protection and Privacy Commitment

Data Protection and Privacy matters to us and we know it matters to you. We are committed to protecting your privacy, keeping your information safe and ensuring the security of your personal information. To provide you with the most effective products and services, your personal information will be collected, processed lawfully, stored securely and not disclosed unlawfully to any third party.

Our Data Protection and Privacy Statement

Our Statement explains how all companies under the MTN Group collect, use and protect your information. It extends to both our control and processing of personal information.

What Personal Information does MTN collect and use

- Personal information collected and held by us may include but not limited to; name, sex, date of birth, addresses, telephone number, mobile phone number, email address, occupation and information contained in supporting documents such as proof of identity and proof of address.
- MTN and its authorized third parties may collect, store, process certain types of personal information. This information includes: biometric data, ethnic origin and financial data, for providing products, services, use of our website and information related to your utilization of our services (which may include your call patterns, your browsing history on our website, location details and additional information provided while using our services).

- At any time while you are browsing our site, if you do not wish to share your location details, you may adjust your preferences by making appropriate changes to your browser privacy settings.

MTN will process your personal data based on

- Our legitimate business interests, for example, direct marketing and improvement of our services. Whenever we rely on this lawful basis to process your data, we assess our business interests to make sure they do not override your rights. Additionally, in some cases you have the right to object to this processing. See "Your Rights" section of the statement.
- Consent you provide where MTN does not rely on another legal basis. Consent will always be presented separately to you, can be withdrawn at any time and you will be given details on how to do so.

Purpose of collecting personal information

MTN collects your personal information for a variety of business purposes. These include, but are not limited to:

- Verifying your identity;
- Completing transactions effectively and billing for products and services;
- Responding to your request for service or assistance;
- Performing market analysis and research as well as business and operational analysis;
- Providing, maintaining and improving our products and services;



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- Anticipating and resolving issues and concerns related to our products and services;
- Promoting and marketing our products and services which may benefit you and be related to products and services you are currently enjoying; and
- Ensuring adherence to legal and regulatory requirements for prevention and detection of fraud and crime.

MTN may keep a log of the activities performed by you on our network and websites by using various internet techniques such as web cookies, web beacons, server log files, etc. for analytical purposes, for analysis of the agreeableness of various features on our site and in accordance with requisite legal requirements. This information may be used to provide you with a better experience on our platforms.

At any time while you are browsing our site, if you do not wish to share browsing information, you may opt out of receiving the cookies from our site by making appropriate changes to your browser privacy settings.

If you do not provide your consent for usage of personal information or later withdraw your consent for use of the personal information collected, MTN may not be able to provide certain products and services to you.

Disclosure and Transfer of Personal Information

- **Collection of Personal Information:** MTN will obtain your consent for sharing your personal information in several ways, such as in: writing; online; through "click-through" agreements; orally, including through interactive voice response; or when your consent is part of the terms and conditions, which apply to our products and services.
- **Internal Use:** MTN and its employees may utilize some or all available personal information for legitimate business purposes and related activities within the parameters mentioned above.
- **Third Parties:** We may have to share your personal information with third parties, including third-party service providers, sub-contractors, other entities within the MTN Group. A 'third party' is a service provider who is contracted by MTN to provide a service or product which may include the handling, managing, storing, processing, protecting and transmitting information of and for MTN. This includes all sub-contractors, consultants and/or representatives of the third party. We require third parties to respect the security of your data and to treat it in accordance with applicable laws.



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- **Government and Law Enforcement Agencies:**

We may also share your personal information with Government agencies or other authorized law enforcement agencies (LEAs) mandated under law to obtain such information for the purpose of verification of identity or for prevention, detection and investigation; including but not limited to cyber incidents, the investigation and prosecution of crime, and as is required by law.

- **Transfer:** MTN may transfer your personal information or other information or data collected, stored and processed by us to any other entity or third party located outside your country of service, only if necessary, for legitimate business purposes for providing services to you. This may also include sharing of aggregated information with third parties contracted to MTN for them to understand our environment and consequently, provide you with better services. While sharing your personal information with third parties, reasonable organizational, technical and security measures shall be taken to ensure that reasonable security practices are followed by the third party and are in line with the law.

Security Practices and Procedures

MTN adopts reasonable security practices and procedures, in line with international standards to include; technical; and organisational security safeguards in order to protect your personal information from unauthorized access, or disclosure while it is under our control.

Our security practices and procedures are within industry standards. Further, our employees and service providers / partners are bound by Codes of Conduct and Confidentiality Policies which require them to protect the confidentiality of personal information they access.

We may retain your personal

information for as long as required to provide you with products and services or as otherwise required under any law.

When we dispose of your personal

information, we use reasonable procedures to erase it or render it unreadable/anonymized.

Internet Use

We maintain the security of our internet connections and observe reasonable security measures to protect your personal information against hacking and virus dissemination. However, for reasons outside of our control, security risks may still arise.



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Storage: How do we keep your information?

We may store your information in hard copy or electronic format and keep it in storage facilities that we own and operate ourselves, or that are owned and operated by our third parties/ service providers.

We use a combination of technical solutions, security controls and internal processes to help us protect your information and our network from unauthorised access and disclosure.

Accuracy: We endeavour to ensure that personal information is accurate and encourage you to update the personal information in our possession as and when it changes by contacting us via the details provided below.

Your Rights

Right to access personal information

You have the right to make a request for a copy of the personal information that MTN holds about you (including advertising audience categories and inferred information) as permitted by law.

Right to correct personal information

You have the right to correct information held about you to ensure it is accurate.

Right to data portability

You have the right to be able to take with you the personal information you provided to us in certain circumstances as permitted by law.

Right to object to use of personal information

You have the right to object to MTN processing your personal information, in certain circumstances as permitted by law.

To opt-out of marketing messages

MTN will not issue targeted marketing to you unless it is for MTN services you are already using or unless you consent for us to do so. If you no longer want to receive marketing messages from MTN, you can choose to opt out at any time using the means made available to you. If you have previously opted in to receive personalised content based on how and where you use our network, you can also opt out at any time.

Right to erasure

MTN strives to only process and retain your data for as long as we need to. You have the right to request that we erase your personal information held by MTN, provided there are no laws compelling MTN to store your personal information longer.

Contact

How to exercise any of above-mentioned Rights - If you would like to exercise any of those rights or have any potential grievances, please contact us on HumanRights@mtn.com

We reserve the right to modify this Data Protection and Privacy Statement as and when required. We will post any changes to our Privacy Notice on our websites. We encourage you to check frequently to see the current Data Protection and Privacy Statement to be informed of how MTN is committed to protecting your information and providing you with improved content on our site in order to enhance your experience.