

Privacy Policy

Last updated: February 20, 2023

1. Overview

Your privacy is very important to Mzuzi Group Limited, and we understand how important it is to you. We want you to feel safe when you visit our website, use our Mzuzi Postcode App or our services and are committed to maintain your privacy when you do so. Our employees, business partners, suppliers and any third-party service providers are required to maintain confidentiality in accordance with the native applicable privacy data laws of the marketplaces we operate in.

This privacy notice together with **TERMS AND CONDITIONS** referred to herein sets out the basis on which we process any personal data we collect from you, or that you provide to us. Please read the following carefully to understand how we process your personal data.

This Privacy Policy can be changed over time to comply with the laws or to meet our business requirements. Usually, the most up-to-date Privacy Policy can be found on our website. We will update you appropriately of any relevant changes to this Privacy Policy. Mzuzi Group Limited maintains an “opt-in” or “opt-out” policy in this Privacy Policy where you can request to withdraw your consent any time.

Subject to applicable laws, the English Version will prevail over any other version. For the purposes of this Privacy Policy, the “Controller” is Mzuzi Group Limited (From now on referred to as “Mzuzi Group Limited”. “We”, or “Us”. This privacy notice should be read together with any other fair processing notice or additional information that we may provide. The data “Controller” processing your personal data will be Mzuzi Group Limited unless we specify otherwise, our address is:

Mzuzi Group Limited or
9 Orchard Court
Mimms Hall Road
EN6 3DW
United Kingdom

Mzuzi Group Limited
Nkuubi Close
Buwate
W8U 8NC
Kampala-Uganda

When you use or receive products or services from Mzuzi Group limited, we will, where appropriate, provide further information about how that personal data will be used.

2. Interpretation and Definitions

Interpretation

The words of which the initial letter is capitalized have meanings defined under the following conditions. The following definitions shall have the same meaning regardless of whether they appear in singular or in plural.

Definitions

For the purposes of this Privacy Policy:

- **Account** means a unique account created for you to access our service or parts of our service.
- **Affiliate** means an entity that controls, is controlled by or is under common control with a party, where "control" means ownership of 50% or more of the shares, equity interest or other securities entitled to vote for election of directors or other managing authority.
- **Application** means the software program provided by the company downloaded by you on any electronic device, named **Mzuzi Postcode App**.
- **Company** (referred to as either "the Company", "We", "Us", "Our", "Owner" or "Provider", of this App in this Agreement) refers to: Mzuzi Group Limited. We usually will be the "data controller" responsible for how and why personal data is used.
- **Country** refers to any of the seven East African Community countries.
- **Device**: means any device that can access the service such as a computer, a cell phone or a digital tablet.
- **Personal Data**: is any information that relates to an identified or identifiable individual.
- **Service**: refers to the Mzuzi web or Mzuzi Postcode App services.
- **Service Provider**: means any natural or legal person who processes the data on behalf of the company. It refers to third-party companies or individuals employed by the

company to facilitate the service, to provide the service on behalf of the company, to perform services related to the service or to assist the company in analysing how the service is used.

- **Usage Data:** refers to data collected automatically, either generated by the use of the service or from the service infrastructure itself (for example, the duration of a page visit, unique device identifiers, your mobile device, your mobile operating system, and other diagnostic data).
- **You:** means the individual accessing or using the service, or the company, or other legal entity on behalf of which such individual is accessing or using the service, as applicable.

3. When does this Privacy Policy apply?

This privacy notice applies if you use any of our products and services. This includes using any of the Mzuzi Group websites such as mzuzigroup.com (from now on referred to as “**Websites**”) or Mobile Apps (from now on referred to as “**Mzuzi Postcode App**”). This policy also applies if you contact us or we contact you about our services, whether by telephone, email, SMS, post, push notifications or via third party platforms (including websites or social media platforms).

4. Who is responsible for your Personal Data?

4.1 Mzuzi Group Limited is responsible for the processing of all personal data described in this Privacy Policy.

4.2 Our Website and Mobile App may contain links to enable you to visit third-party websites, and mobile applications which are governed by their own privacy policies. Please note that we are not responsible or liable for the protection and privacy of any information that you provide whilst visiting those sites.

5. How we collect and receive personal data

5.1 We may collect and receive Personal Data directly from you or from your authorised representative(s) or from third parties (e.g., Our service providers). We may also collect

Personal Data of your relatives or principal where you disclose personal data on their behalf, including when you:

(a) Use or access our website or App, particularly when completing the "registration details" section during the course of installing the Mzuzi Postcode App.

(b) Communicate with us such as by email, telephone, in writing, or through our customer services pages or social media platforms.

(c) Register, create, or modify an online or in-App account with us, including your Mzuzi Postcode App account, or your Mzuzi website account.

(d) Contact history. Details of any enquiry, complaint or claim you have made to Mzuzi Group Limited and may include copies of correspondence and telephone call records. This information is provided to us when you contact us to make an enquiry or complaint. We will create records relating to this contact.

(e) Recordings or images of you. Images recorded on CCTV and other equipment used to protect our customers, employees, and property. We will record images of you if you visit our location where CCTV is in operation, and or we may receive photographs and images of individuals where these are provided by you or a third party. For example, if you upload your image onto one of our websites.

(f) Financial details: Records of your payments and your payment information. The source of this information is you when you provide this information yourself when you use our services or provide it to receive a payment.

(g) Address data: When you apply to be issued with Mzuzi Postcode/Address, or register on our Mzuzi Postcode App. We get your personal data when providing you this service. or when we are delivering goods to a building or delivery point address that may include personal data (for example, where a delivery point/property is identified by the occupier's surname). Mzuzi Group Limited may receive this information from you or from a local authority.

5.2 We may also collect your Personal Data through our website or mobile Apps and other channels including our and third-party providers or subcontractors where you have consented to providing your Personal Data to them or where we subcontract them to assist us in providing services to you.

5.3 Where you disclose Personal Data on behalf of another person, you will ensure that the individual whose Personal Data is supplied to Mzuzi Group Limited has authorized the disclosure, is informed of and consents to processing of their Personal Data in accordance with this Privacy Policy. Where the disclosure is in respect of a child’s Personal Data, you should do as only as the parent or legal guardian of that child and enter into relevant contracts on behalf of that child.

6 How we use personal data

Mzuzi Group Limited processes personal data for several different purposes. We will only process your personal data where there is a legal basis for doing so under data protection laws for example, in short, the relevant legal bases are:

- i. **Consent:** You give consent for us to process your data for a specific purpose.
- ii. **Contract:** The processing is necessary for a contract or agreement with you.
- iii. **Legal Obligation:** The processing is necessary to comply with the law.
- iv. **Legitimate Interests:** The processing is necessary for legitimate interests pursued by Mzuzi Group Limited or our business partners.

The table below gives summary.

No.	Purpose	Legal Basis
1	Providing services to you where there is a contract or agreement in place with you.	Legal obligation- For the performance of a contract: The development, compliance and undertaking of the purchase contract for the products, items, or services you have purchased or

		of any other contract with us through the service.
2	Issuing to you a Mzuzi Postcode/Address or Addresses	To provide and maintain our service, including to monitor the usage of our service for legitimate interests.
3	Providing delivery services to you when you have paid us to do so, or when providing delivery services to a third party, such as when someone sends you a parcel and we use your data to deliver it or provide delivery updates.	Legitimate Interests – We need to process your data to provide these delivery services for which you have paid or when a third party has paid us.
4	Customer services – dealing with enquiries, complaints or claims relating to our services and products.	Legitimate Interests – To manage Your Account: to manage Your registration as a user of the service. The Personal Data you provide can give you access to different functionalities of the service that are available to you as a registered user
5	As part of Mzuzi’s track and trace services, where we provide a service which informs both the sender and recipient of Mzuzi Group services about the delivery status and timing of that service.	Legitimate Interests – We need to monitor the delivery status of delivery services to improve our service and provide better information to our customers.
6	Providing data services to other companies, namely our business customers or partners, to help them run their businesses better, and for regulatory requirements. For example, we provide services for the purposes of maintaining	Legitimate Interests – our business customers and regulatory agencies have a legitimate interest to process data in these ways, and we have a legitimate interest to process

	and updating accurate address data, for identity verification or fraud prevention purposes.	personal data to support them to do so. In each case, we need to process your personal data to pursue those interests.
7	To contact you.	Legitimate Interests & Consent- to contact you by email, telephone calls, SMS, chat, or other equivalent forms of electronic communication, such as a mobile application's push notifications regarding updates or informative communications related to the functionalities, products, or contracted services, including the security updates, when necessary or reasonable for their implementation.
8	When you use the Mzuzi Postcode Mobile App	To manage your requests: To attend and manage your requests to us to provide you with a good service for legitimate reasons.
9	For business transfers.	Legitimate Interests – We may use your information to evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which Personal Data held by us

		about our service users is among the assets transferred.
10	Customs and tax clearance, and security screening when sending or receiving post to or from overseas.	Legal Obligation – We need to process personal data to comply with revenue and customs regulations.
11	Prevention and detection of crime – including the use of CCTV to protect our customers, employees, and property.	For Legitimate Interests as well as legal obligation – We sometimes need to process personal data to protect the rights, property and the personal safety of our staff and customers.
12	Complying with, National, International law, including delivery services’ regulatory requirements, protocols, and standards.	Legal Obligation – to comply with our legal obligations, including regulatory conditions relevant to postal operators, and health and safety legislation, we sometimes must process personal data.
13	For other purposes.	Legitimate interest: We may use your information for other purposes, such as data analysis, identifying usage trends, determining the effectiveness of our promotional campaigns and to evaluate and improve our service, products, services, marketing, and your experience.

14	Where the same purpose or legal obligation has been repeated, please contact us for clarification.
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7 Information about marketing

7.1 Marketing: To provide you with news, special offers and general information about other goods, services, and events which we offer that are similar to those that you have already purchased or enquired about unless you have opted not to receive such information.

We will not send individuals these communications if you opt out or otherwise ask us to stop direct marketing. Where we collect contact information from you, which may be used for marketing purposes, we will provide you with an opportunity to object to marketing. We may use your personal data to enable us to provide you with targeted marketing content through social media and other online platforms.

7.2 Market Research: We like to hear your views as this can help us to improve our products and services. So, from time to time, we may contact you for market research purposes. You always have the choice about whether to take part in our market research.

8. Disclosure of Your Personal Data

We will not share any of your data with any third parties for any purposes other than

8.1 Business Transactions: If the company is involved in a merger, acquisition or asset sale, Your Personal Data may be transferred. We will provide notice before your Personal Data is transferred and becomes subject to a different Privacy Policy.

Also, we may compile statistics about the use of our site including data on traffic, usage patterns, user numbers and other information. All such data will be anonymised and will not include any personally identifying data, or any anonymised data that can be combined with other data and used to identify you.

8.2 Law enforcement: Under certain circumstances, the company may be required to disclose Your Personal Data if required to do so by law or in response to valid requests by public authorities (e.g., a court or a government agency).

8.3 Other legal requirements: The company may disclose your Personal Data in the good faith belief that such action is necessary to:

- Comply with a legal obligation.
- Protect and defend the rights or property of the company.
- Prevent or investigate possible wrongdoing in connection with the service.
- Protect the personal safety of users of the service or the public.
- Protect against liability.
- Prevention of fraud and cyber crime

9. How do we keep your data safe?

The security of Your Personal Data is important to us but remember that no method of transmission over the Internet, or method of electronic storage is 100% secure. While we strive to use commercially acceptable means to protect your Personal Data, we cannot guarantee its absolute security. However, to protect your data we have taken appropriate measures to safeguard and secure data.

9.1 Safeguards: Mzuzi Group Limited has taken adequate safeguards to ensure the confidentiality and security of your personal data. We are committed to ensuring that your Personal Data is secure. In an effort to prevent unauthorised access to, or disclosure of, your Personal Data, we have put in place physical, technical, and administrative safeguards to protect your Personal Data against accidental or unlawful destruction or accidental loss, damage, alteration, unauthorised disclosure, or access, as well as all other forms of unlawful processing (including, but not limited to, unnecessary collection) or further processing. In order to protect the security of your information, where necessary, we use encryption technology when collecting or transferring Personal Data.

10. Children's Privacy

Our service does not address anyone under the age of 13. We do not knowingly collect personally identifiable information from anyone under the age of 13. If you are a parent or guardian and you are aware that your child has provided us with Personal Data, please contact us. If we become aware that we have collected Personal Data from anyone under the age of 13 without verification of parental consent, we take steps to remove that information from our servers.

If We need to rely on consent as a legal basis for processing your information and your country requires consent from a parent, we may require your parent's consent before we collect and use that information.

11. Retention of Your Personal Data

The Company will retain your Personal Data only for as long as is necessary for the purposes set out in this Privacy Policy. We will retain and use your Personal Data to the extent necessary to comply with our legal obligations (for example, if we are required to retain your data to comply with applicable laws), resolve disputes, and enforce our legal agreements and policies.

The company will also retain Usage Data for internal analysis purposes. Usage Data is generally retained for a shorter period of time, except when this data is used to strengthen the security or to improve the functionality of our service, or we are legally obligated to retain this data for longer time periods.

12. Your legal rights

Mzuzi Group exercises fair processing of your personal rights.

12.1 You have the right to be informed: We will provide you with 'fair processing information' where we collect personal data from you (for instance when you open an account or apply for a service online) and through privacy notices such as this one.

12.2 Right of Access: You have the right to access your personal data and details of how we process it. Proof of identification is required to protect your information. We also request that

applicants state which information and processing activities their request relates to. An optional application form may be provided to assist us in confirming your identity and locating the information you require.

12.3 Right to Rectification: You have the right to have personal data about you rectified if it is inaccurate or incomplete. However, Mzuzi Group Limited relies on customers to ensure that some of the information it holds about them is accurate and up to date. We encourage customers to inform us of any changes to their information. (For example, change of address or telephone contacts).

12.4 Right to Object: You have the right to object to some uses of personal data, such as direct marketing.

12.5 Right to Erasure: You have the right to request that we delete or remove of personal data from our records where there is no legitimate reason for us to continue processing it. Where personal data is still needed for legitimate purposes, it will not be possible to delete that data and some requests may therefore be declined.

12.6 Right to Withdraw Consent: Where we process your personal data based on your consent, you have the right to withdraw that consent.

13. How to Contact Us

For all enquiries about Mzuzi Group products and services, please contact us through.

- i. Filling out the Contact Us form on our website;
- ii. <https://www.mzuzigroup.com/contact/us/>
- iii. Email us: info@mzuzigroup.com
- iv. Write to us:

Mzuzi Group Limited	or;	Mzuzi Group Limited
9 Orchard Court		Nkuubi Close
Mimms Hall Road		Buwate
EN6 3DW		W8U 8NC
United Kingdom		Kampala-Uganda

- v. Telephone: +(44) 7934 869265(Mob), or +(256) 779824431

14. Links to Other Websites and use of website Cookies

Our service may contain links to other websites that are not operated by us. If you click on a third-party link, you will be directed to that third party's site. We strongly advise you to review

the Privacy Policy of every site you visit. We have no control over and assume no responsibility for the content, privacy policies or practices of any third-party sites or services.

Also, our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and allows us to improve our site.

15. Changes to this Privacy Policy

We may update our Privacy Policy from time to time. We will notify you of any changes by posting the new Privacy Policy on this page.

We will let you know via email and/or a prominent notice on our service, prior to the change becoming effective and update the "**Last updated**" date at the top of this Privacy Policy.

You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.