



# Vodacom Tanzania PLC Employee Privacy Statement

Policy Standards Supported / Objective	Owner	Vivienne Penessis
<p>The objective of this statement is to explain how Vodacom Tanzania collects, use, shares and protects your personal information.</p> <p>This document supports the Privacy Risk Management Standard and the following principles:</p> <ul style="list-style-type: none"> <li>• Vodacom is committed to process personal information honestly, ethically, with integrity, and always consistent to applicable law and our values</li> <li>• Vodacom is transparent with our employees about the personal information we collect, use, share and store about them</li> <li>• Vodacom employees understand how Vodacom collects and processes their personal information and their rights with respect to this personal information.</li> </ul>	Author	Collins Kimario
	Version	Version 1.9

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## 1 Our Privacy Promise

Employee's entrust us with their privacy – whether it's the protection of their personal information, the confidentiality of their private communications or the way we develop our products and services. The way we handle their privacy is a vital part of our responsibility to employees and how we earn their trust. We aim to create a culture where everyone at Vodacom has a clear understanding of how important privacy is to our employees and how to ensure it is respected. Our Privacy Promise sets out the principles that govern our approach to privacy and how we communicate with employees, partners and other stakeholders on relevant issues – such as designing products to protect privacy or assisting with law enforcement.

Vodacom's privacy principles are:

### How we operate

- **Accountability:** we are accountable for living up to these principles throughout our corporate family, including when working with our partners and suppliers. We have in place accountable privacy compliance measures and we monitor and enforce our compliance with these principles.
- **Fairness and lawfulness:** we comply with privacy laws and act with integrity and fairness. We will work with governments, regulators, policy makers and opinion formers for better and more meaningful privacy laws and standards.
- **Openness and Honesty:** we communicate clearly about actions we take that may impact privacy, we ensure our actions reflect our words, and we are open to feedback about our actions
- **Choice and access:** we give people the ability to make simple and meaningful choices about their privacy and allow individuals, where appropriate, to access, update or delete their personal information.

### How we manage and protect personal information

- **Responsible Data Management and limited disclosures:** we apply appropriate data management practices to govern the processing of personal information. We choose the partners who participate in processing of personal information carefully and we limit disclosures of personal information to such partners to what is described in our privacy statement or to what has been authorized by our employees.
- **Security safeguards:** we implement appropriate technical and organisational measures to protect personal information against unauthorized access, use, modification or loss.

### How we design our products and services

- **Privacy by Design:** respect for privacy is a key component in the design, development and delivery of our products and services.

### How we make decisions

- **Balance:** when we are required to balance the right to privacy against other obligations necessary to a free and secure society, we work to minimize privacy impacts.

## 2 Who we are

Vodacom Tanzania Plc are the controller of your personal information. We are a member of the Vodafone Group and manage HR operations, including the processing of personal information about you.

Our registered office is at 7<sup>th</sup> Floor, Vodacom Tower, Ursino Estate, Plot No.23, Bagamoyo Road, of P.O Box 2369 Dar es Salaam. We are registered in the United Republic of Tanzania under company number 38501. We provide details of how to contact us under section 7 of this privacy statement.



In some circumstances, Vodafone Group Services Limited (VGSL) controls the processing of your personal information jointly with us, in particular for the provision of Office-IT and related services and in any other circumstances where such a role has been defined in a privacy notice. The registered office of VGSL is [Vodafone House, The Connection Newbury, Berkshire RG14 2FN]. Registered in [England under company number 03802001]. Unless otherwise specified in a separate privacy statement, the way your personal information is processed will remain compatible with the wording of this privacy statement. You may read the VGSL privacy statement on the Global Privacy Portal.

### 3 Definitions

In this privacy statement:

“we/us” means Vodacom Tanzania Public Limited Company;

“third party” means someone who is not you or us or a part of Vodafone Group or Vodacom Group; and

“Vodafone” or “Vodafone Group” means Vodafone Group Plc and any company or other organisation in which Vodafone Group Plc owns 50% or above of the share capital.

### 4 The Basics

#### 4.1 Personal information we collect about you

##### 4.1.1 Vodacom will process your personal information based on;

- a) **The performance of your employment contract with Vodacom** and to take action on your requests, including for example, leave requests or providing you with the correct pay; or
- b) **Vodacom’s legitimate business interest**, including for example, fraud prevention, maintaining the security of our systems, investigations relating to compliance with our policies or laws, to defend our lawful interests in legal proceedings, meeting our targets for diversity, organisational planning and effectiveness and improving our services and workplace for employees; or
- c) **Compliance with a mandatory legal obligation**, subject to strict internal policies and procedures which control the scope of legal assistance to be provided; or
- d) **Consent you provide**, where Vodacom does not rely on another legal basis or in addition to performance of contract or reliance on our legitimate business interests, you choose to provide us with your personal information and the processing of that information is voluntary including for example, when you take part in events organised by Vodacom. Your consent can be withdrawn at any time.

##### 4.1.2 How we collect information about you

We collect personal information about you when you apply for a job at Vodacom and subsequently as we prepare for you to start your employment with us. Some of the information we collect about you is required by law, for the provision of your employment contract, and to fulfil the obligations within that contract – we will make this clear at the point where we collect the information. If you do not provide this information then we will not be able to create a contract of employment or we will not be able to fulfil our obligations under that contract e.g. paying your salary, approving leave request. Other personal information we collect is subsequently generated during the course of your employment by our internal processes and applications.

We may collect personal information about you from external sources including third party service providers whom we have engaged to provide specific services to you, and to whom you have agreed to share your personal information with us. For example, third parties who process our pensions, share incentive schemes, company car hire or business travel bookings. We may also collect personal information about you where the information has been made publicly available.



#### 4.1.3 The types of personal information we may collect about you are, for example:

- a) **Personal details**, such as name, date of birth, address, personal email address, telephone number, emergency contact details (including name, relationship and home and mobile telephone numbers), proof of identity, details of your spouse/partner and any dependants, details about your vehicle including vehicle registration
- b) **Employment information**, means job related information such as employee number, contract of employment, amendments to terms and conditions, letter of resignation, record of service, annual leave forms, company email address, company mobile number, job title, job description; CV, sickness and absence records, annual leave forms, company email address, company mobile number, time and attendance records and applications for other roles within Vodacom;
- c) **Recruitment information**, such as your application, CV, interview notes, references from previous employers, internal references; nationality and immigration status, passport and other identification and immigration details and criminal records information checks (where applicable);
- d) **Salary and Payment information**, such as social security number, record of pay, payments for travel allowances (e.g. car share), bank details, tax reference details, expenses claims and payments, pension records, salary and benefits details such as details of any share, incentive or pension arrangements and the information included in these and necessary to implement and administer them;
- e) **Performance and Talent information**, such as training, training evaluation records, qualifications, personal development reviews, details of appraisals and performance management or improvement plans, performance & talent rating, video/call recordings and chat logs with customer evidence from investigations, records of disciplinary actions;
- f) **General HR administration information**, such as general correspondence with HR, redundancy records, records of complaints and grievances;
- g) **Employee authentication information**, such as your Vodacom username and password needed to log in to the Vodacom network;
- h) **Your use of work devices**, services, systems, networks, accounts and corporate communications.
- i) **Security in the workplace and off site**, such as onsite CCTV footage, other security camera footage such as vehicle dashcams and andaccess card records;
- j) **Cookies**, on certain internal HR pages and Vodacom intranet.
  - i) We may also collect sensitive personal information about you – but only where this is strictly necessary to perform our legal obligations as an employer or when this information is provided on a voluntary basis. For example: we may collect information about your health, such as sickness records, medical certificates, in order provide sick pay or maternity cover and to perform our health & safety obligations as an employer;
  - ii) we may collect records of criminal convictions for security background checks at the recruitment stage;
- k) **Your use of Vodacom owned, supplied vehicles**, such as information about your nominated drivers (where applicable), information related to your vehicle booking, information in your Driver Declaration Forms, telematics data (location data, usage data, mileage and vehicle generated engine performance data, which will provide information about the way you drive, where you have been driving, or if you exceeded the speed limit), mileage reporting, information relating to damages, accidents, servicing and inspections, fines and offences and dash cam recordings;
- l) **Photos or video footage**, if you provide us photos or videos of yourself which may also include your spouse/partner and any dependants or where you can be identified in photos or videos taken by Vodacom or our partners and/or suppliers during events;
- m) **Defend Vodacom's lawful interests**, for example in legal proceedings in accordance with applicable laws.



We may also collect sensitive personal information about you where necessary –as an employer or when this information is provided on a voluntary basis. For example:

- a) we may collect information about your racial or ethnic origin to evaluate our compliance with the requirements set by equal employment legislation and relevant codes of practice;
- b) we may collect information about your physical and mental health, such as attendance and sickness records, fit notes, occupational health and Certified Medical Practitioner reports in order to provide sick pay or maternity cover, manage your absence, make reasonable adjustments for you, complete an occupational health, Certified Medical Practitioner referral, disability information to help prioritise you for on-site car parking, and to perform our health and safety obligations as an employer;
- c) we may collect records of criminal convictions and other necessary security and regulatory background checks (where applicable) on recruitment and during employment;

## 4.2 How we use information about you

We may process the personal information that we collect about you for the following purposes:

- a) **Meeting our contractual obligations as your employer**, such as managing your employment contract. For example, we must include your name, date of birth and other information in the employment contract you enter with us.
- b) **Meeting our legal obligations as an employer**, such as providing government agencies with your employment information and managing our tax responsibilities. For example, we will provide your tax information to the government agencies;
- c) **Resourcing**, such as recruiting people internally, onboarding people into Vodacom, managing international mobility. For example, during onboarding we collect your personal email address so we can correspond with you during the recruitment process;
- d) **Learning and development**, such as identifying learning requirements, managing learning solutions, delivering learning. For example, Vodafone University may use your profile to recommend training courses;
- e) **Rewards and Recognition**, such as performing annual reward review, managing recognition and reward, managing global shares schemes. For example, we use information about your pay to generate your end of year reward statement;
- f) **Communication & Involvement**, such as conducting surveys amongst employees, letting you know about important business change. For example, we may conduct surveys with our employees to collect insights on a specific topic like diversity and inclusion;
- g) **Maintain employee health, safety and wellbeing**, such as managing employee safety and wellbeing incidents, monitoring employee wellbeing, conducting employee safety and wellbeing audit. For example: using information about incidents to register workplace incidents or contacting your emergency contact in the event of an emergency or analysing and reporting on, investigating and/or responding to your use of Vodacom owned, supplied vehicles. ;
- h) **Organisation Effectiveness & Change**, such as internal reporting or analysis to support business and cultural change or reviewing organisational effectiveness and or organisational planning. For example, we may use your workplace location and access card records to understand the impact on desk capacity in our sites;
- i) **Information security and investigations**, please see *4.2.1 Monitoring and assuring compliance with Vodacom policies* below for more information;
- j) **Monitor compliance with Vodacom policies**, please see *4.2.1 Monitoring and assuring compliance with Vodacom policies* below for more information;
- k) **Operational and administration**, such as managing requests and changes to your information during your employment lifecycle including payroll, recording time and attendance, travel and expenses, user access management, Office IT resolving issues and requests raised to HR services;



- l) **Performance and talent management**, such as managing employee performance aligned to business goals, review employee potential, identify and review development of talent, management of resource. For example, we believe in "pay for performance" and to continue to differentiate our reward based on performance and potential;
- m) **Promoting Vodacom or Vodacom's products and services**, for example Vodacom media relations activity, print publications, online publications, presentations, websites and social media;
- n) **Bids and tenders and meeting our contractual obligations with current and prospective clients, landlords, partners, external suppliers and business customers**, such as providing your personal data to a current or prospective business customer. For example: some responses to tenders and bids for contracts and services require us include CVs for particular employees and roles and some business customer contracts require us to provide your personal details and/or employment and other security background check outcomes and recruitment information to the business customer (for example, to enable security accreditation to be obtained or to enable customer or landlord site access).
- o) **Defend Vodacom's lawful interests**, for example in legal or investigatory proceedings in accordance with applicable laws.

#### 4.2.1 Monitoring and assuring compliance with Vodacom policies

In order to ensure Vodacom is compliant with its internal policies, we may process your employee personal information for the purposes of monitoring your compliance with internal Vodacom policies such as collecting your personal information on our Gifts & Hospitality register in order to comply with our Anti-bribery policy. You will find these policies on the [Global Policy Portal](#). This information may be processed in the course of an investigation into such a matter.

In order to protect the confidentiality, integrity and availability of Vodacom's business information, personal information and our IT systems and other systems, we monitor to the extent allowed by applicable laws, your use of:

- Vodacom owned equipment (for example your company laptop, tablet and phone);
- Vodacom owned and/or supplied vehicles;
- Access to Vodacom sites and surveillance on those sites;
- User owned devices (for example devices that are owned by a Vodacom employee and that are used to access Vodacom's systems and to access, process, store and transmit Vodacom's corporate data);
- Corporate networks (for example your access to document management systems, your use of internal networks, tools, applications and your online browsing); and
- Corporate communications accounts (for example your messages sent via. Outlook, Yammer, Skype for Business – this can include, in certain circumstances, viewing the content of your messages).

**Please note:** information will only be processed for this purpose when it is moved or sent in breach of Vodacom's **Information Security Policy** and subject to applicable national laws even when you are not connected to the corporate VPN. You will find this policy on the [Global Policy Portal](#).

For example, we routinely scan our employees' use of our corporate network and corporate communications accounts to detect threats such as computer viruses, attempts to access suspicious third party websites, unauthorised access attempts and internal misuse (such as a breach of our information security policy). Similarly, software in your work device monitors the flow of information leaving your device and would alert internal security teams about a breach of policy as soon as your device reconnected to the corporate VPN.

We encourage you to read our **policies** which explain how to use your Vodacom owned equipment and user owned devices, networks and communications accounts in compliance with internal company policy. You can also find more about our information security practices in our **Information Security Policy**. You can find these security policies on the [Global Policy Portal](#).



In some circumstances (for example if an internal investigation is opened, or Vodacom is subject to disclosure/discovery procedures as part of a regulatory investigation or legal proceedings) we may:

- remotely monitor your usage of our work devices, networks and communications accounts as outlined above – in more detail;
- require you to hand in your work device to be forensically analysed (**Please note:** if you store personal information, such as photos, documents or apps, onto the hardware of your work device these could be accessed by an investigator in the course of conducting their forensics analysis); or
- review your travel expenses to check for fraudulent expense claims or claims that are in breach of internal company policy, please see our [Expenses Policy](#) on the [Global Policy Portal](#) for more information;
- Other means deemed necessary to conclude an investigation subject to Vodafone's legitimate interests and applicable national law.

Information gathered from such investigations could be used in subsequent disciplinary or legal proceedings. For more information please read our [Investigation Policy](#) on the [Global Policy Portal](#).

For clarity, we do not, under any circumstances routinely, monitor your usage of work devices when you are:

- Using your work phone or tablet outside of work apps (for example, when you use your work phone to download and use apps like Facebook, Netflix, MyVodacom and Amazon or to take photos); or
- Saving personal information, such as photos, documents or apps, onto personal use cloud accounts (e.g. Google Docs, Dropbox or Facebook) from your work device (but our forensic investigators do potentially have access to personal information you save to the hard drive of your work device).

For further information, please see section 8 'Specific information for your country' in this privacy statement.

#### **4.2.2 Analytics and automated decision making**

We may process the personal information that we collect about you to do analytics for the purposes identified in section 4.2 of this statement. By way of brief summary:

- Many use cases will solely generate **anonymous, aggregate insights** which do not identify you personally;
- However, some use cases may involve **profiling** which means evaluation, analysis or prediction of aspects concerning you and your performance at work, including for example for the purposes of talent management, succession planning or fraud prevention.

We do not use analytics for **automated decision-making** (that is, decision making with no human involvement) which would produce legal effects or other similar significant impacts on you. Rather the insights generated by the analytics are used to provide additional insights and data points to inform our activities, for example, relating to reporting or business planning. You may learn about our analytics activities through your local Privacy Officer. Their contact details are available under section 8 'Specific information for your country'.

#### **4.3 Who we share information about you with**

We may share personal information about you with:

- Vodafone Group Services Limited where they may be a joint data controller;
- Other companies in the Vodacom Group subject to inter-company data processing agreements;
- Companies or consultants who are engaged to perform services for, or on behalf of Vodacom Group including for example, those who process our pension and share incentive schemes, company car hire or business travel bookings or other companies on the Vodacom Group;
- Law enforcement agencies, government bodies, regulatory organisations, courts or other public authorities if we have to, or are authorised to by law;
- A third party or body where such disclosure is required to satisfy any applicable law, or other legal or regulatory requirement;
- Other third parties when we have your consent to so (for example providing a personal reference to a bank, building society, landlord or property agent);



- In conjunction with any merger, sale or acquisition of a company in the Vodacom Group.

#### 4.4 Where we process information about you

In doing the above, we may need to transfer personal information about you to other companies in the Vodacom Group or third parties located (or whose servers may be located) in countries outside of where you are employed, , we will make sure that there is a legal basis for such transfer and that your personal information is adequately protected as required by applicable law, for example, by using standard agreements approved by relevant authorities and by requiring the use of other appropriate technical and organizational measures to protect your personal information.

Please contact your local Privacy Officer if you would like to find out more about the way we comply with our legal obligations in relation to international data transfers. Their contact details are available under section 8 'Specific information for your country'.

#### 4.5 How long we keep information about you

We'll store your information for as long as is required we have to by law. If there's no legal requirement, we'll only store it for as long as is necessary for the purpose of processing. Generally, this means that we will retain your information for as long as you are employed by Vodacom, and after you may leave we retain some of that information for long as is necessary to fulfil the purposes for which it was collected as prescribed by the law, for example after you leave Vodacom, we will keep your information for the relevant limitation period of 5 years in which you could bring a claim against Vodacom.

#### 4.6 How we protect your personal information

Vodacom is committed to protecting your personal information. We apply strong security and privacy measures to protect your personal information from unauthorised access, use, loss, disclosure or destruction. For example, we encrypt your personal information when it is transmitted, and we store it in a controlled environment with limited access. Our dedicated security and privacy teams conduct assessments on our products, services and operations to ensure our privacy and security policies are implemented. Our suppliers and others who process personal information on our behalf are expected to comply with our high standards. Vodacom employees and approved third parties who need access to personal information are subject to internal policies, strict confidentiality obligations and training. We monitor the implementation of these internal policies. Failure to comply with our policies may lead to investigation and possible disciplinary action. Vodacom complies with applicable data protection laws, including applicable data breach notification laws

## 5 Your rights

As Vodacom employee you can exercise the following rights over how M-Pesa control and use your personal data. Please read the information available on the MyHR 'Data Privacy' page which outlines which information you already have access to through success factors or how to make a further request to HR through the self-serve portal or Tobi:

- Right of access to personal data:** you have the right to make a request for a copy of the personal data that Vodacom holds about you, the purposes for which they are being processed and the recipients or classes of recipients to whom they are or may be disclosed you. You already have access to your personal information such as your address, bank detail, family members/dependents, through My HR, your pay slips, etc. If any of your personal data is not accessible through self-service tools, you have the right to make to make a request. Please refer to myHR 'Data Privacy' page for details on how to do this
- Right to prevent processing likely to affect you:** You have a right to require Vodacom to suspend or not to begin, processing of any personal data in respect of which you if the processing of such personal data is likely to cause substantial damage to you or to another person. Please refer to myHR 'Data Privacy' page for details on how to do this;





- c) **Right to prevent the processing of personal data for direct marketing purposes:** you have the right to require Vodacom to stop processing your personal data for purposes of direct marketing. Please refer to myHR 'Data Privacy' page for details on how to do this;
- d) **Rights in relation to automated decision making:** at any time you may require a human based decision, instead of an automated decision, in cases where the automated decision would produce legal effects on you, or otherwise similarly significantly affect you. Further, you shall have the right to reject the use of his personal data in the decision made by automatic means. Please refer to myHR 'Data Privacy' page for details on how to do this;
- e) **Right to rectify:** You have a right to rectify the personal data that is not correct, changed, outdated, incomplete or misleading, you can log in to your employee profile on Success Factorsto update it;
- f) **Right to erasure, block or destroy-** In certain circumstances, you have the right to request erasure, block or destruction of personal information that Vodacom processes about you, subject to the requirement of the country's laws. Please refer to myHR 'Data Privacy' page for details on how to do this;
- g) **Right to compensation-** If your rights have been infringed by Vodacom by reason of any contravention of any of the requirements of the Personal Data Protection Act, you are entitled to compensation from Vodacom for that damage. Please refer to myHR 'Data Privacy' page for details on how to do this;

If we do not take action based on any of the above requests, we will inform you of the reasons why. You may exercise the same rights over your personal information controlled by Vodafone Group Services Limited by emailing AskHRGroupUK@vodafone.com.

## 6 Changes to this Privacy Statement

This privacy statement is updated from time to time, so we would encourage you to check it regularly. If we make a major change, will let you know by email.

## 7 How to contact us

If you have further questions about this privacy statement or how we process your information, please contact our Privacy Officer. The contact details are available in section 8 'Specific information for your country'.

## 8 Specific information for your market

If you are unhappy, feel free to keep in touch with the following;

Our email: [Ask.Privacyteam@vodacom.co.tz](mailto:Ask.Privacyteam@vodacom.co.tz) or

Jacqueline Kalaze (Privacy Officer) through +255754710015 or [kalazej@vodacom.co.tz](mailto:kalazej@vodacom.co.tz)

## 9 Document History

Vers.	Date	Changes	Approved by
1	27/11/2018	Version 1.0	Vivienne Penessis
1.2	24/5/2019	Updates to section 4.1.2 Updates to section 4.2 Creation of section 4.6 Updates to section 8	Vivienne Penessis/Henri Nyondo
1.9	20/08/2023	- Employees rights section 5 have been added as per Personal Data Protection Act, No. 11 of 2022 and explain how to exercise individual rights - Updated section 4.1.3 'The types of personal information we may collect	Vivienne Penessis



about you' to include additional data that is being collected.