



# Vodacom Tanzania Plc

## External Workforce Privacy Statement

### Policy Standards Supported / Objective

The objective of this statement is to explain how Vodacom collects, use, shares and protects your personal information.

This document supports the Privacy Management Policy and the following principles:

- Vodacom is committed to process personal information honestly, ethically, with integrity, and always consistent to applicable law and our values
- Vodacom is transparent about the personal information we collect, use, share and store.
- People working at Vodacom understand how Vodacom collects and processes their personal information and their rights with respect to this personal information.

**Owner**

Vivienne

**Author**

Collins Kimario

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## 1 Who we are

Vodacom Tanzania Plc is the controller of your personal information that is collected and processed subject to your engagement with Vodacom. We are a member of the Vodafone Group and manage operations, including the processing of personal information about the workers engaged by Vodacom

Our registered office is Vodacom Tower, 7<sup>th</sup> Floor, Plot No. 23, Ursino Estate, Bagamoyo Road, Dar es Salaam. We are registered in the United Republic of Tanzania under company number 38501.

However, the supplier you are supplied by or engaged with may also be a data controller for certain personal information that they collect, process and share with Vodacom. This will be governed by their own privacy policy. You should contact the supplier you are engaged with or supplier by, directly for more information about their privacy policy and how they process your personal information.

## 2 Definitions

In this privacy statement:

“we/us” means Vodacom Tanzania Plc;

“third party” means someone who is not you or us or a part of Vodafone/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.

## 3 The Basics

### 3.1 Personal information we collect about you

#### 3.1.1 Vodacom will process your personal information based on

1. **The performance of a contract with Vodacom** subject to the terms of the agreement between Vodacom and the supplier you are supplied by or engaged through, or your engagement agreement with Vodacom;
2. **Vodacom’s legitimate business interest**, including for example, managing your engagement with and/or work for Vodacom, fraud prevention, maintaining the security of our corporate network and internal systems;
3. **Compliance with a mandatory legal obligation**, where certain information is necessary to satisfy a legal or regulatory requirement, subject to strict internal policies and procedures which control the scope of legal assistance to be provided;
4. **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.

#### 3.1.2 How we collect information about you

We collect personal information about you from our external workforce suppliers or from you directly when you are engaged to work at Vodacom, for example, your name and contact details including your telephone number and email address. Other personal information we collect about you is subsequently generated during the course of your engagement with Vodacom by our corporate network, internal processes and applications and our arrangement or contract with the external workforce supplier.

#### 3.1.3 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 dependents, details about your vehicles including vehicle registration



- b) **Role information**, information related to your engagement with or supply to Vodafone such as an identification number, contact details, role title, role description, CV (as applicable) and other identification and immigration details and criminal records information (where applicable);;
- c) **User authentication information**, such as your username and password required to log in to the Vodacom corporate network;
- d) **Your use of Vodacom devices and corporate network**, services, systems, networks, accounts and corporate communications. Please see *3.2.1 Monitoring and assuring compliance with Vodacom policies* below for more information;
- e) **Training records**, such as the training you have been assigned, completion rate and scores.
- f) **Security in the workplace and off site**, such as onsite CCTV footage, other security camera footage such as vehicle dashcams and access card records;;
- g) **Cookies**, on certain internal sites pages and Vodacom intranet.
- h) **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;
- i) **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; and
- j) **Defend Vodacom's lawful interests**, for example in legal or investigatory proceedings in accordance with applicable laws.

We may also collect sensitive personal information about you where necessary – as part of our duties for persons not in our employment or when this information is provided on a voluntary basis. For example:

- a) we may collect information about your physical and mental health to perform our health and safety obligations as an employer to ensure that persons not in our employment who may be affected are not exposed to risks to their health or safety, and disability information to help prioritise you for on-site car parking;
- b) we may collect records of criminal convictions and other necessary security background checks (where applicable) on and during your engagement with Vodacom.

### 3.2 How we use information about you

We may process the personal information that we collect about you for the following purposes: **Administering your engagement**, such as organising interviews and on boarding or processing time sheets where required;

- a) **Access management**, such as to give you physical access to Vodacom premises and access to the corporate network and applications when required;
- b) **Administering your engagement**, such as organising interviews and on boarding, managing your engagement, or processing time sheets where required;
- c) **Communication & involvement**, such as where you register for internal networks or events;
- d) **Training & development**, such as providing you with specific product or tailored training to help you in your role.
- e) **Maintaining health, safety and wellbeing**, such as managing safety and wellbeing incidents or conducting audits, ensuring that persons not in our employment who may be affected are not exposed to risks to their health or safety or analysing and reporting on your use of Vodacom owned, supplied vehicles;



- f) **Organisation effectiveness & change**, such as internal reporting or analysis to support business and cultural change or reviewing organisational effectiveness. For example, the proportion of external workforce in different functions or at office locations in the business;
- g) **Monitor compliance with Vodacom policies**, such as information security or completion of any mandatory compliance training where required. Please see [3.2.1 Monitoring and assuring compliance with Vodacom policies](#) below for more information;
- h) **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 information 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 staff and roles and some business customer contracts require us to provide your personal details and/or employment and other security background check outcomes and engagement information to the business customer (for example, to enable security accreditation to be obtained or to enable customer or landlord site access);
- i) **Promoting Vodacom or Vodacom's products and services**, for example Vodacom media relations activity, print publications, online publications, presentations, websites and social media;
- j) **Meeting our legal and regulatory obligations when you are engaged by Vodacom** such as reporting and sharing your personal information such as your name with regulators where required.
- k) **Meeting our contractual obligations with our external workforce suppliers** such as managing our contract with the supplier you are supplied by or engaged through.

### 3.2.1 Monitoring and assuring compliance with relevant Vodacom policies

In order to assure Vodacom is compliant with its internal policies, we may process your personal information for the purposes of monitoring your compliance with the relevant internal Vodacom policies. You will find these policies on the Vodacom Intranet and [Global Policy Portal](#). This information may be processed in the course of an investigation into such a matter for example, where it is alleged or suspected that there has been unauthorised or inappropriate use of Vodacom systems.

In order to protect Vodacom business, employee and customer information, as well as the integrity of our IT systems, we monitor your use of any:

- Vodacom owned equipment (for example a 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 user owned devices 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 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 captured or viewed when it, has been, moved or sent in breach of Vodacom's [Information Security Policy](#), even when you are not connected to the VPN, and subject to applicable national laws. You will find this policy on the [Global Policy Portal](#).

For example, we routinely scan our workforce's 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 a breach as soon as your device reconnected to the VPN.

We encourage you to read our [Acceptable Usage Guidance](#) which explains how to use any Vodacom owned equipment and your 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 outline above – in more detail;
- require you to hand in your work device to be forensically analysed (**Please note:** that 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); or
- Other means deemed necessary to conduct and conclude an investigation subject to Vodacom's legitimate interests and applicable national law.

Information gathered from such investigations could be used in subsequent regulatory, 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, monitor your usage of work devices when you are:

- Using your Vodacom owned phone or tablet outside of work apps (for example, when you use your work phone to download and use apps like Facebook, Netflix, MyVodacom, M-Pesa 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).

### 3.2.2 Analytics and automated decision making

We may process the personal information that we collect about you to do reporting and analytics for the purposes identified in section 3.2 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 when working at Vodacom, including for example for the purposes of performance and reporting to our external workforce supplier 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 the local Privacy Officer. Their contact details are available under section 8 'Specific information for your country'.

### 3.3 Who we share information about you with

We may share personal information about you with:

- Companies in the Vodacom and Vodafone Group;
- External workforce suppliers for the purposes of administering your engagement with Vodacom;
- Companies or consultants who are engaged to perform services for, or on behalf of Vodacom Group or Vodafone Group or a company in the Vodafone Group, including for example, those who process our benefits and discount schemes or manage our premises;
- 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;
- In conjunction with any merger, sale or acquisition of a company in the Vodacom and Vodafone Group.



### 3.4 Where we process information about you

In doing the above, we may need to transfer personal information about you to other companies in the Vodafone Group or third parties located (or whose servers may be located) in countries outside of where you are engaged, including countries outside of the European Economic Area (EEA). If we send personal information about you to a country that is not in the EEA, 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 the 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'.

### 3.5 How long we keep information about you

We'll store your information for as long as we have to by law. If there's no legal requirement, we'll only store it for as long as we need to. Generally, this means that we will retain your information for as long as you are engaged by Vodacom, and after you leave we retain some of that information for long as is necessary to fulfil any legal or regulatory requirements and the purposes for which it was collected as prescribed by the law, for example when your engagement with Vodacom ends, we will keep your information for the relevant limitation period in which you or the external workforce supplier could bring a claim against Vodacom.

## 4 Your rights

You may make a request to the data controller to exercise the following rights over your personal information:

- a) **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 can contact [askhrtanzania@vodacom.co.tz](mailto:askhrtanzania@vodacom.co.tz).
- b) **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 by contacting [askhrtanzania@vodacom.co.tz](mailto:askhrtanzania@vodacom.co.tz)
- 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.. You can contact [askhrtanzania@vodacom.co.tz](mailto:askhrtanzania@vodacom.co.tz)
- 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 by contacting [askhrtanzania@vodacom.co.tz](mailto:askhrtanzania@vodacom.co.tz)
- e) **Right to rectify:** You have a right to rectify the personal data that is not correct, changed, outdated, incomplete or misleading by contacting [askhrtanzania@vodacom.co.tz](mailto:askhrtanzania@vodacom.co.tz)
- 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. You can request by contacting [askhrtanzania@vodacom.co.tz](mailto:askhrtanzania@vodacom.co.tz)
- 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. You can request by contacting [askhrtanzania@vodacom.co.tz](mailto:askhrtanzania@vodacom.co.tz)

If we don't take action based on any of the above requests, we will inform you of the reasons why.

Please note, Vodacom is only a data controller for the personal information collected, processed and stored for the purposes outlined in this Privacy Statement. The supplier you are supplied by or engaged with may also be a data controller for certain personal information that they collect, process and share with Vodacom. This will be governed





by their own privacy policy. You should contact the supplier you engaged with or supplied by directly for more information about their privacy policy and how to exercise your data subject rights with them.

## 5 Changes to this Privacy Statement

This privacy statement gets updated from time to time, so we'd encourage you to check it regularly.

If you have any further questions about this privacy statement or how we process your information, please contact the local Privacy Officer. Their contact details are available in section 7 'Specific information for your country'. We'll do our best to help. If you need any clarification on this policy, you can contact the local Privacy Officer at +255754710015 or [Ask.Privacyteam@vodafone.co.tz](mailto:Ask.Privacyteam@vodafone.co.tz)

## 6 Document History

Vers.	Date	Changes	Approved by
1.0	22/01/2019	Version 1.0	Vivienne Penessis
2.0	20/08/2023	<ul style="list-style-type: none"><li>- External Employees rights have been added as per the Personal Data Protection Act, No. 11 of 2022 and explain how to exercise individual rights</li><li>- Updated section 4.1.3 'The types of personal information we may collect about you' to include additional data that is being collected.</li></ul>	Vivienne Penessis