

AIRTEL MOBILE COMERCE ZAMBIA LTD
DATA PRIVACY & PROTECTION POLICY

Version 2.0

Document Control

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Document Distribution

The Human Resources Director shall distribute this policy to all employees of Airtel Mobile Commerce Zambia.

Document Conventions

All statements in the document are mandatory requirements. Failure to observe these requirements may be construed as non-compliance to the policy.



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1. Introduction

As part of our operation, Airtel Mobile Commerce Zambia Ltd (“Airtel Money”) collects and processes certain types of information (including but not limited to, name, telephone numbers, address, gender, photograph, ID card number, fingerprint, and signature etc.) of individuals and corporates as part of the Know Your Customer process as well as transaction processing.

These subjects include customers, current, past and prospective employees, merchants, suppliers/vendors, customers of merchants and other individuals whom Airtel Money communicates or deals with, jointly and/or severally (“Data Subjects”).

Maintaining the Data Subject’s trust and confidence requires that Data Subjects do not suffer negative consequences/effects as a result of providing Airtel Money with their Personal Data.

To this end, Airtel is firmly committed to complying with applicable data protection laws, regulations, rules and principles to ensure security of Personal Data handled by the Company. This Data Privacy & Protection Policy (“Policy”) describes the minimum standards that must be strictly adhered to regarding the collection, use and disclosure of Personal Data and indicates that Airtel is dedicated to processing the Personal Data it receives or processes with absolute confidentiality and security.

This Policy applies to all forms of systems, operations and processes within the Airtel Money environment that involve the collection, storage, use, transmission and disposal of Personal Data.

Failure to comply with the data protection rules and guiding principles set out in the Zambian local law data privacy and protection legislation as well as those set out in this Policy is a material violation of Airtel Money’s policies and may result in disciplinary action as required, including suspension or termination of employment or business relationship.

2. Scope

This Policy applies to all employees of Airtel Money, as well as to any external business partners (such as merchants, agents, aggregators suppliers, contractors, vendors and other service providers) who receive, send, collect, access, or process Personal Data in any way on behalf of Airtel Money, including processing wholly or partly by automated or manual means. This Policy also applies to third party Data Processors who process Personal Data received from Airtel Money.

3. General Principles for Processing of Personal Data

Airtel Money is committed to maintaining the principles in the Data Protection Act No. 3 of 2021 (the “DPA”) regarding the processing of Personal Data.

To demonstrate this commitment as well as our aim of creating a positive privacy culture within Airtel, we adhere to the following basic principles relating to the processing of Personal Data:



3.1 Lawfulness, Fairness and Transparency

Personal Data must be processed lawfully, fairly and in a transparent manner at all times. This implies that Personal Data collected and processed by or on behalf of Airtel must be in accordance with the specific, legitimate and lawful purpose consented to by the Data Subject, save where the processing is otherwise allowed by law or within other legal grounds recognized in the DPA.

3.2 Data Accuracy

Personal Data must be accurate and kept up to date. In this regard, Airtel will:

- a) make efforts to ensure that any data it collects and/or processes is accurate and not misleading in a way that could be harmful to the Data Subject;
- b) make efforts to keep Personal Data updated where reasonable and applicable; and
- c) make timely efforts to correct or erase Personal Data when inaccuracies are discovered.

3.3 Purpose Limitation

Airtel Money will process personal data based on one of the following grounds:

- a) performing a contract or to enter into a contract with the data subject, for example, we process the numbers customers send to and receive money from, how much has been used to settle bills
- b) Airtel Money's legitimate business interests, as long as these do not override the data subject's rights and freedoms. For example, fraud prevention, security of our network and services, marketing, analysing and improving our services; or
- c) complying with a mandatory legal obligation, for example, accounting, tax, money laundering, anti-bribery requirements.

Airtel Money will collect personal data relating to:

- a) employees and applicants for employment, including an employee's job application, records of training, documentation of performance appraisals, salary increases, expense claims and other employment records (Employee Personal Data)
- b) consumers (i.e., members of the public to whom we do not directly sell our products and services but who use, will use or are considering using a service which Airtel Money will ultimately provide) and customer contacts (Customer Personal Data)
- c) users of our websites or other related services provided by Airtel (User Personal Data)
- d) supplier contacts, industry professionals and other individuals who provide goods and/or services to the Airtel (Supplier Personal Data).
- e) Agents and aggregators who may form part of our distribution coverage
- f) Merchants and Corporates who form part of our customer base through our servicing of their specific needs



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Airtel Money holds and processes Employee Personal Data for the following purposes:

- a) administering and managing its employees;
- b) administering employee benefits and entitlements;
- c) protecting the legitimate interests of the Airtel Money, including investigating acts or defaults; and
- d) compliance with applicable laws, regulations and rules.

Airtel Money holds and processes Customer Personal Data for the following purposes:

- a) administering and managing our relationships with our consumers and customers, which may include:
 - i. dealing with enquiries, processing orders and providing the customer with products and services (including facilitating delivery);
 - ii. taking the appropriate measures to invoice and take the appropriate payment or credit from the customer; and
 - iii. providing updated information, such as changes to terms and conditions;
- b) marketing and promoting our products and services and inviting customers to participate in market research;
- c) any corrective action which may be required in respect of any of the products and services we supply;
- d) improving and innovating our products and services which, for example, enables us to manage our networks and understand network usage more effectively;
- e) credit checks, fraud prevention, debt recovery and security purposes; and
- f) compliance with applicable laws, regulations and rules.

Airtel Money holds and processes User Personal Data for the following purposes:

- a) supplying marketing and promotional material (at the user's express request) and advertising online;
- b) administering and improving our websites and related purposes, (including collecting and analyzing anonymous, de-identified and aggregate information); and
- c) compliance with applicable laws, regulations and rules.

Airtel Money holds and processes Supplier Personal Data for the following purposes:

- a) administering the receipt of products and services from its suppliers;
- b) administering and managing its relationships with its suppliers; and
- c) compliance with applicable laws, regulations and rules.



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Airtel Money may share the personal data that it collects with its corporate affiliates and third parties operating on its behalf. Airtel Money will only share personal data with companies that are required to protect personal data in accordance with relevant laws, regulations and rules, and subject to any appropriate security measures and directions from the relevant Airtel Money data controller, and in accordance with this policy.

3.4 Data Minimization

- 3.4.1 Airtel Money limits Personal Data collection and usage to data that is relevant, adequate, and absolutely necessary for carrying out the purpose for which the data is processed.
- 3.4.2 Airtel Money will evaluate whether and to what extent the processing of personal data is necessary and where the purpose allows, anonymized data must be used.

3.5 Integrity and Confidentiality

- 3.5.1 Airtel Money shall establish adequate controls in order to protect the integrity and confidentiality of Personal Data, both in digital and physical format and to prevent personal data from being accidentally or deliberately compromised.
- 3.5.2 Personal data of Data Subjects must be protected from unauthorized viewing or access and from unauthorized changes to ensure that it is reliable and correct.
- 3.5.3 Any personal data processing undertaken by an employee who has not been authorized to carry such out as part of their legitimate duties is un-authorized.
- 3.5.4 Employees may have access to Personal Data only as is appropriate for the type and scope of the task in question and are forbidden to use Personal Data for their own private or commercial purposes or to disclose them to unauthorized persons, or to make them available in any other way.
- 3.5.5 Human Resources Department must inform employees at the start of the employment relationship about the obligation to maintain personal data privacy. This obligation shall remain in force even after employment has ended.

3.6 Personal Data Retention

- 3.6.1 All personal information shall be retained, stored and destroyed by Airtel in line with legislative and regulatory guidelines. For all Personal Data and records obtained, used and stored within the Company, Airtel shall perform periodic reviews of the data retained to confirm the accuracy, purpose, validity and requirement to retain.
- 3.6.2 To the extent permitted by applicable laws, the length of storage of Personal Data shall,



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amongst other things, be determined by:

- (a) the contract terms agreed between Airtel and the Data Subject or as long as it is needed for the purpose for which it was obtained; or
- (b) whether the transaction or relationship has statutory implication or a required retention period; or
- (c) whether there is an express request for deletion of Personal Data by the Data Subject, provided that such request will only be treated where the Data Subject is not under any investigation which may require Airtel Money to retain such Personal Data or there is no subsisting contractual arrangement with the Data Subject that would require the processing of the Personal Data; or
- (d) whether Airtel Money has another lawful basis for retaining that information beyond the period for which it is necessary to serve the original purpose.

3.6.3 Airtel Money will use all reasonable means to not keep any Personal Data in Airtel Money's possession where such Personal Data is no longer required by Airtel Money provided no law or regulation being in force requires Airtel Money to retain such Personal Data.

3.7 Accountability

3.7.1 Airtel Money demonstrates accountability in line with the DPA obligations by monitoring and continuously improving data privacy practices within Airtel Money.

3.7.2 Any individual or employee who breaches this Policy may be subject to internal disciplinary action (up to and including termination of their employment); and may also face civil or criminal liability if their action violates the DPA.

3.7.3 Any business partner who may include agent, merchant, aggregator etc. who breaches this policy may be held liable and their act will result in action which may include termination of relation and may also face civil or criminal liability.

4. Data Privacy Notice

4.1 Airtel Money considers Personal Data as confidential and as such must be adequately protected from unauthorized use and/or disclosure. Airtel Money will ensure that the Data Subjects are provided with adequate information regarding the use of their Personal Data as well as acquire their respective Consent, where necessary.

4.2 Airtel Money shall display a simple and conspicuous notice (Privacy Notice) on any medium through which Personal Data is being collected or processed. The following information must be considered for inclusion in the Privacy Notice, as appropriate in distinct circumstances in order



to ensure fair and transparent processing:

- a) Description of collectible Personal Data;
- b) Purposes for which Personal Data is collected, used and disclosed;
- c) What constitutes Data Subject's Consent;
- d) Purpose for the collection of Personal Data;
- e) The technical methods used to collect and store the information;
- f) Available remedies in the event of violation of the Policy and the timeframe for remedy; and
- g) Adequate information in order to initiate the process of exercising their privacy rights, such as access to, rectification and deletion of Personal Data.

4.3 Airtel Money Privacy Notice shall be made available on Airtel website

5. Consent

Where processing of Personal Data is based on consent, Airtel Money shall obtain the requisite consent of Data Subjects at the time of collection of Personal Data. In this regard, Airtel Money will ensure:

- a) that the specific purpose of collection is made known to the Data Subject and the Consent is requested in a clear and plain language;
- b) that the Consent is freely given by the Data Subject and obtained without fraud, coercion or undue influence;
- c) that the Consent is sufficiently distinct from other matters to which the Data Subject has agreed;
- d) that the Consent is explicitly provided in an affirmative manner;
- e) that Consent is obtained for each purpose of Personal Data collection and processing; and
- f) that it is clearly communicated to in a simple language and understood by Data Subjects that they can update, manage or withdraw their Consent at any time.

6. Data Subject Rights

6.1 All individuals who are the subject of Personal Data held by Airtel Money are entitled to the following rights:

- a) Right to request for and access their Personal Data collected and stored. Where data is held electronically in a structured form, such as in a Database, the Data Subject has a right to receive that data in a common electronic format;
- b) Right to information on their personal data collected and stored;
- c) Right to, rectification of inaccurate personal data concerning the data subject kept by Airtel as soon as practicable.
- d) Right to erasure of personal data of that data subject as soon as practicable
- e) Right to object, to processing of that data subject's personal data. kept by Airtel Money;
- f) Right to restriction of processing;
- g) Right to object to decision taken on basis of automatic data processing;
- h) Right to Information when personal data collected directly from data subject by Airtel



- i) Right to request for deletion of their data, except as restricted by law or Airtel statutory obligations;
- j) Right to request the movement of data from Airtel Money to a Third Party; this is the right to the portability of data; and
- k) Right to object to, and to request that Airtel Money restricts the processing of their information except as required by law or Airtel Money's statutory obligations.

Opting out of marketing and unsolicited messages

If a customer no longer wants to receive marketing messages from Airtel Money, they can choose to opt out at any time. If they have previously opted in to receive personalized content based on how and where they use our services, they can also opt out at any time.

These are various ways to opt out:

- Contact our customer services team via the email address CustomerservicestaffHQ@zm.airtel.com
- Reach out to any member of the High Value Experience managers or Key Account Managers (KAMs)
- Click the unsubscribe icon from our email or newsletters if you receive any.
- Disable push notification messages, including marketing messages, at any time in our apps by changing the notification settings on your device or by uninstalling the app and
- Customer can also activate DND (Do not Disturb) by dialing applicable short code
- Customers can Contact our customer service team by dialing applicable line

6.2 Airtel Money's well-defined procedure regarding how to handle and answer Data Subject's requests are contained in Airtel Money's Data Subject Access Request Policy.

6.3 Data Subjects can exercise any of their rights by completing the Airtel Money's Subject Access Request (SAR) Form and submitting to the Company via dataprotection@zm.airtel.com

7. Transfer of Personal data

7.1 Third Party Processor within Zambia

Airtel Money may engage the services of third parties in order to process Personal Data of collected by us. The processing by such third parties shall be governed by a written contract with Airtel Money to ensure adequate protection and security measures are put in place by the third party for the protection of Personal Data in accordance with the terms of this Policy and the DPA. We may also share your personal data with law enforcement agencies where required by law to do so.

Where applicable, Airtel Money will share data subject information with:



- a) Partners, suppliers or agents involved in delivering the products and services ordered or used by the customer. For example, when a customer applies for loan, the loan request will be handled by our business partner who is bound by contract to protect your personal data.
- b) Law enforcement agencies, government bodies, regulatory organisations, courts or other public authorities if we have to, or are authorized to by law. For example, under the Cybercrimes Act, a law enforcement agency may request a service provider to keep or release any statement data, subscriber information, content or non-content information. This is however for law enforcement purposes only.
- c) A third party or body where such disclosure is required to satisfy any applicable law, or other legal or regulatory requirement e.g. to detect or prevent fraud or the commission of any other crime.
- d) A merging or acquiring entity where we undergo business reorganization e.g. merger, acquisition or takeover.

7.2 Transfer of Personal Data to Foreign Country

7.2.1 Where Personal Data is permitted to be transferred to a country outside Zambia under conditions laid out by the DPA, Airtel Money shall put adequate measures in place to ensure the security of such Personal Data. In particular, Airtel Money shall, among other things, ensure that it complies with the law prescriptions as outlined by the DPA which are guided by the following:

- (a) ensuring that the relevant personal data is subject to an adequate level of protection, having regard to the applicable laws and international agreements; and
- (b) the enforcement of data protection laws by authorities with appropriate jurisdiction is effective.

7.2.2 The transfer of Personal Data out of Zambia is prohibited except for the few exceptions made in accordance with the provisions of the DPA. Airtel Money will therefore only transfer Personal Data that is categorized as transferable under the DPA under the following conditions:

- (a) the Data Subject has consented; and
 - (i) the transfer is made subject to Airtel Money standard contracts
 - (ii) or intragroup schemes that have been approved by the Data Protection Commissioner; or
 - (iii) the law prescribes that such transfers outside the Republic are permissible;
 - (iv) Or the Data Protection Commissioner approves a particular transfer or set of transfers as permissible due to a situation of necessity.

8. Data Breach Management Procedure

- 8.1 A data breach procedure is established and maintained in order to deal with incidents concerning Personal Data or privacy practices leading to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, Personal Data transmitted, stored or otherwise processed.
- 8.2 All employees must inform their designated line manager or the Data Protection Officer of Airtel immediately about cases of violations of this Policy or other regulations on the protection of Personal Data, in accordance with Airtel Money **Personal Data Breach Management Procedure** in respect of any:
- a) improper transmission of Personal Data within or across borders;
 - b) loss or theft of data or equipment on which data is stored;
 - c) accidental sharing of data with someone who does not have a right to know this information;
 - d) inappropriate access controls allowing unauthorized use;
 - e) equipment failure where data is stored;
 - f) human error resulting in data being shared with someone who does not have a right to know; and
 - g) hacking attack.
- 8.3 A data security breach notification must be made immediately and not later than 24 hours after any data security breach to ensure that:
- a) immediate remedial steps can be taken in respect of the breach;
 - b) any reporting duties to Data Protection Commissioner or any other regulatory authority can be complied with,
 - c) any affected Data Subject can be informed and
 - d) any stakeholder communication can be managed.
- 8.4 When a potential breach has occurred, Airtel will investigate to determine if an actual breach has occurred and the actions required to manage and investigate the breach as follows:
- a) Validate the Personal Data breach.
 - b) Ensure proper and impartial investigation (including digital forensics if necessary) is initiated, conducted, documented, and concluded.
 - c) Identify remediation requirements and track resolution.
 - d) Report findings to the top management
 - e) Coordinate with appropriate authorities as needed.
 - f) Coordinate internal and external communications.
 - g) Ensure that impacted Data Subjects are properly notified, if necessary.
 - h) Immediately the breach is detected it needs to be notified to the Group Privacy Officer and



Chief Legal Officer

9. Data Protection Impact Assessment

Airtel Money shall carry out a Data Protection Impact Assessment (DPIA) in respect of any new project or IT system involving the processing of Personal Data to determine whenever a type of processing is likely to result in any risk to the rights and freedoms of the Data Subject.

Airtel Money shall carry out the DPIA in line with the procedures laid down in the Airtel Data Protection Impact Assessment Policy to the extent that the policy is consistent with the DPA requirements on the conduct of a DPIA..

10. Data Security

10.1 All Personal Data must be kept securely and should not be stored any longer than necessary. Airtel will ensure that appropriate measures are employed against unauthorized access, accidental loss, damage and destruction to data. This includes the use of password encrypted databases for digital storage and locked cabinets for those using paper form as well as timely and appropriate disposal of such data

10.2 To ensure security of Personal Data, Airtel will, among other things, implement the following appropriate technical controls:

- a) Industry-accepted hardening standards, for workstations, servers, and databases.
- b) Full disk software encryption on all corporate workstation/laptops operating systems drives storing Personal and Personal/Sensitive Data.
- c) Encryption at rest including key management of key databases.
- d) Enable Security Audit Logging across all systems managing Personal Data.
- e) Restrict the use of removable media such as USB flash disk drives.
- f) Anonymization techniques on testing environments.
- g) Physical access control where Personal Data are stored in hardcopy.

11. Data Protection Officer

Airtel Money shall appoint a Data Protection Officer(s) (DPO) in line with the DPA, responsible for overseeing the Company's data protection strategy and its implementation to ensure compliance with the DPA requirements. The DPO shall be a knowledgeable person on data privacy and protection principles and shall be familiar with the provisions of the DPA.

The main tasks of the DPO include:

- a) administering data protection policies and practices of Airtel Money;



- b) monitoring compliance with the DPA and other data protection laws, data protection policies, awareness-raising, training, and audits;
- c) advise the business, management, employees and third parties who carry on processing activities of their obligations under the DPA;
- d) acts as a contact point for Airtel Money on all matters pertaining to the subject;
- e) monitor and update the implementation of the data protection policies and practices of Airtel Money and ensure compliance amongst all employees of Airtel Money;
- f) ensure that Airtel Money undertakes a Data Impact Assessment and curb potential risk in Airtel Money data processing operations; and
- g) maintain a Data Base of all Airtel Money data collection and processing operations.

12. Training and awareness

Airtel Money shall ensure that employees who collect, access and process Personal Data receive adequate data privacy and protection training in order to develop the necessary knowledge, skills and competence required to effectively manage the compliance framework under this Policy and the DPA with regard to the *protection of Personal Data*. On an annual basis, Airtel shall develop a capacity building plan for its employees on data privacy and protection in line with the DPA.

All other data handlers who may include agents, merchants etc. shall be made aware of the required data privacy and protection requirements.

13. Changes to the Policy

Airtel Money reserves the right to change, amend or alter this Policy at any point in time. If we amend this Policy, we will provide you with the updated version.



14. Glossary

- “Consent”** means any written, freely given, specific, informed and unambiguous indication of the data subject’s wishes by which such data subject, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to that data subject.
- “Database”** means a collection of data organized in a manner that allows access, retrieval, deletion and processing of that data; it includes but not limited to structured, unstructured, cached and file system type Databases.
- “Data Processor”** means a person, or a private or public body that processes personal data for and on behalf of and under the instruction of Airtel.
- “Data Protection Commissioner”** means a person appointed as Data Protection Commissioner as per Section 5 of the Data Protection Act No. 3 of 2021
- “Data Subject”** means an individual from, or in respect of whom, personal information is processed.
- “Personal Data”** “personal data” means data which relates to an individual who can be directly or indirectly identified from that data which includes a name, an identification number, location data, an online identifier, or one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.
- “Sensitive Personal Data”** means personal data which by its nature may be used to suppress the data subject’s fundamental rights and freedoms and includes:
- (a) the race, marital status, ethnic origin or sex of a data subject;
 - (b) genetic data and biometric data;
 - (c) child abuse data;
 - (d) a data subject’s political opinions;
 - (e) a data subject’s religious beliefs or other beliefs of a similar nature;
 - (f) whether a data subject is a member of a trade union; or
 - (g) a data subject’s physical or mental health, or physical or mental condition.



a. General Information

Title	Data Privacy and Protection Policy
Status	Mandatory
Issuing Department	Airtel Money
Distribution/Target Audience	All employees, including contracted staff, vendors/ suppliers and customers of Airtel Money
Approver	Airtel Mobile Commerce Director
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b. Version Control

Version	Last Updated	Reason for Amendment
V1	May 2022	Sign off
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Internal

15. Approvals

Designation	Name	Signature	Date
Legal & Regulatory Director (ANZ)	Suzyo Ndovi-Akatama		02/04/2025
Sales & Distribution Director (ANZ)	Francis Simfukwe		04/04/25
Human Resources Director (ANZ)	Bwembya Barbara Chikonde		08/04/2025
Information Technology Director (ANZ)	Paul Chikubwai		09/04/25
Supply Chain Management Director (ANZ)	Martin Jowi		04.4.2025
Airtel Money Director (AMC)	Andrew Chuma		04.04.2025
Customer Service Director (ANZ)	Kapa Kaumba		04.04.2025
Marketing Director (ANZ)	Sylvia Elsheikh		4/4/2025
Enterprise Director (ANZ)	Lindiwe Banda		4/4/25
Finance Director (ANZ)	Samir Warman		10/4/25
Managing Director (ANZ)	Hussameldin Baday		11/4/25