


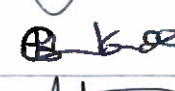




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|  AIRTEL NETWORKS ZAMBIA PLC | | Standard Operating Procedure | | Document No | PR-DSRC-LR-24-01 |
| Process Name: | Data Subject Requests and Complaints Handling Procedure | Version no: | 1.0 | Process Owner: Legal & Regulatory and Customer Experience | |
| | | Prepared By: Limpo Mubita | | Page Nos: | 14 |


| Version | Date | Sections Updated | Description of the Change |
|---------|-----------|------------------|---------------------------|
| 1.0 | June 2024 | All sections | Adoption of group process |
| 3.0 | June 2026 | | Next Review Date |

| APPROVALS | | | | |
|-------------|-------------------|---------------------------------|---|------------|
| | Name | Job Title | Signature | Date |
| Approved By | Suzyo Akatama | Legal & Regulatory Director |  | 16.07.25 |
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| Approved By | Bwembya Chikonde | Human Resources Director |  | 21/08/25 |
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1. OVERVIEW

As part of its operations, Airtel Networks Zambia PLC ("Airtel Zambia PLC") collects and processes certain types of information (including but not limited to, name, telephone numbers, postal address, email address, gender, photograph, CCTV footages, ID card number, fingerprint, and signature etc.) of individuals that makes them easily identifiable. These individuals include customers, current, past, and prospective employees, merchants, suppliers/vendors, partners, customers of merchants and other individuals whom Airtel Zambia communicates or deals with, jointly and/or severally ("**Data Subjects**").

2. PURPOSE

This purpose of this document is designed to set out the processes involved when Airtel Zambia receives a request or complaint from a data subject.


Adherence to this procedure ensures that Airtel Zambia adheres to established procedures when servicing data subject rights requests and complaints, to:

- ensure responses are consistent across the company.
- ensure that such requests or complaints are handled in a timely and efficient manner.
- minimize the risk of Airtel Zambia committing a breach of data protection legislation.
- ensure that personal data is dealt with in a fair, legal, and transparent manner.
- monitor issues that are recurring in nature.
- increase data subject's confidence in the organization.

3. SCOPE

This process applies to all processing of personal data by Airtel Zambia employees particularly for data subject requests and complaints. This could potentially involve any employee of Airtel Zambia not only front-line staff.


4. DEFINITION

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| Definition / Abbreviation | Meaning |
|---------------------------|--------------------------------|
| Data Subject | Airtel Zambia Stakeholders |
| SLA | Service Level Agreement |
| DPO | Data Protection Officer |
| DPC | Data Protection Commissioner |
| IT | Information Technology |
| OPCO | Operating Company |
| ID | Identity |
| CCTV | Closed Circuit Television |
| CX | Customer Experience Department |

5. RESPONSIBILITIES

| Function | Responsibility |
|----------------------|--|
| Legal and Regulatory | <ul style="list-style-type: none"> • Ensure Data subject rights are protected. • Ensure Data subject enjoys their rights. • Custodians of Data protection. |
| Customer Experience | <ul style="list-style-type: none"> • Receive and resolve customer data subject requests/complaints. • Provide/educate customers regarding their rights to data subjects. • Ensuring requests are forwarded to the relevant department in a timely manner and engaging with them to ensure that any queries about the requests are dealt with. |
| Human Resources | <ul style="list-style-type: none"> • Ensure employee data is correctly stored and processed in the prescribed manner. • Provide employee with their personal information should they request for it. • Manage the disciplinary process in an event that an employee discloses unauthorised information |
| Airtel Money | <ul style="list-style-type: none"> • Support Customer service to processing customer requests and provide data required for Airtel Money products and services |

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- Information Technology
- Ensure availability of system whenever customer request for their data
 - Storage to customer records and ensure data is stored to up to 10 years

6. DATA SUBJECT RIGHTS

Under the Zambia Data Protection Act 2021 (“the Legislation”) all data subjects whose personal data is held by Airtel Zambia are entitled to the following rights:


- 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.
- Right to objection or request for restriction of their personal data.
- Right to object to automated decision making.
- Right to request rectification and modification of their data which Airtel Zambia keeps.
- Right to request for deletion of their data, except as restricted by law or Airtel Zambia’s statutory obligations.
- Right to request the movement of data from Airtel Zambia to a Third Party; this is the right to the portability of data; and
- Right to object to, and to request that Airtel Zambia restricts the processing of their information except as required by law or Airtel Zambia’s statutory obligations.

6.1 When a data subject request on privacy matters is received by Airtel Zambia through the various touch points i.e. Call Centre, email, letters, social media, in person through our service centres; the recipient shall endeavour to acknowledge receipt of the request within two 2 business days. Thereafter, it is important that the privacy requests reach the Data Protection Officer (DPO) for review, as soon as possible after receipt for further action. Airtel Zambia reserves the right to extend the period needed to respond during Public Holidays or during closure of the business.

6.2 The DPO is responsible for ensuring requests are forwarded to the relevant department in a timely manner and engaging with them to ensure that any queries about the requests are dealt with.

6.3 Airtel will comply with a data subject request within the timelines prescribed herein unless under exceptional circumstances whereby the data subject will be informed prior to the original deadline.

6.4 Airtel Zambia will only accept a request from a data subject’s representative if the representative provides the data subject written and signed consent authorizing the representative to act on their behalf in relation to the request.

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7. GUIDELINES

DATA SUBJECT RIGHTS

SLA

7.1 Right to Access

7 days

Section 58 of the Zambian Data Protection Act provides for the right to access and notification. The right of access to information (data subject access right) obliges Airtel Zambia to provide individuals with access to their data and with information about how their data is processed. Airtel Zambia must confirm whether personal data is being processed about the data subject and provide a copy of that data (subject to exemptions and the rights and freedoms of third parties). A data subject can request any and all information held about them by Airtel Zambia. Subject Access Requests often involve account statements, call data records, employment records among others.

7.1.1 All Airtel Zambia employees must be aware of the right of access to personal data and must manage their data accordingly. It is possible that any employee will be asked to provide data about individuals with whom they have had professional contact, so information recorded about this contact must be appropriate, retrievable, and managed in accordance with Airtel Zambia's Data Protection Retention Schedule. The deadline for the provision of information is set following consideration of the volume of work required to both locate the information and for the DPO to assess it, apply exemptions and prepare the information for disclosure e.g. applying redaction.

7.1.2 Airtel will not charge the data subject for personal data access; however printing or photocopying charges will apply for customers who request for hard copies.


7.1.3 An employee requesting for access to personal data, other than their own, based on a lawful basis such as fulfilment of a court order or regulatory requirement, will fill in a request form as annexed hereto under Appendix I and forward to the relevant department for action. The filled in request forms will thereafter be forwarded to the Data Protection Officer for record purposes.

14 days

7.2 The Right to Erasure

Under section 60 of the Data Protection Act 2021, data subjects have the right to request that personal data about them processed by Airtel Zambia be erased or destroyed without undue delay; this is personal data that is irrelevant, excessive, obtained unlawfully or that Airtel Zambia is no longer authorised to retain.

7.2.1 The circumstances under which data must be erased upon request include the following: data is no longer necessary in relation to the purpose for which they were collected; processing was undertaken on the basis of the data subject's consent, but that consent has been withdrawn; there is no overriding legitimate legal basis for continued processing of the data; or data is processed for direct marketing purposes, and the data subject wishes this data to be erased.

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30 days

7.3 The Right to Data Portability

Section 65 of the Data Protection Act entitles a data subject to transmit their personal data to another data controller or data processor without any hindrance and where technically possible, the data subject shall have the right to have the personal data transmitted directly from one data controller or processor to another.

7.3.1 The right to data portability shall not apply in circumstances where processing may be necessary for the performance of a task carried out in the public interest or in the exercise of an official authority; or it may adversely affect the rights and freedoms of others.

7.3.2 Airtel Zambia shall comply with data portability requests, at a prescribed reasonable cost and within a period of 30 days. Where the portability request is complex or numerous, the period of 30 days may be extended for a further period as may be determined and communicated to the data subject.

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7.4 The Right to Rectification

14 days

Section 59 of the Data Protection Act entitles data subjects to request that data held about them which is inaccurate, incomplete, outdated or misleading be rectified. The data subject is also entitled to be informed if inaccurate or incomplete data has been disclosed to third party recipients, and Airtel Zambia has the duty to inform these third parties of the rectification, unless this would involve disproportionate effort.

7.4.1 Airtel Zambia is entitled to take a view on the accuracy and completeness of data which may vary from that of the data subject and refuse to rectify data on demand. The data subject would then have a right of appeal to the Data Protection Commissioner (DPC)

7.5 The right to object to automated decision making.

Section 62 of the Data Protection Act restricts data controllers from making decisions about individuals based solely on automated means, where those decisions will have a significant impact on individuals.

7.5.1 Data subjects who feel that they have been subject to wholly automated decision making have the right to complain to the DPC or to take legal action. Airtel Zambia can use wholly automated decision making by seeking consent provided that the process is fair and transparent and sufficiently explained to the data subject.

7.5.2 Airtel Zambia employees must ensure that there is no processing which involves decisions being taken about individuals by wholly automated means and without human input. This is particularly true where the processing could have a significant impact on an individual or where sensitive personal data such as health, sexuality, ethnicity, or religious belief are involved.


14 days

7.6 The right to object to processing

Section 61 of the Data Protection Act confers rights on data subjects to object to the processing of data unless the data controller or data processor demonstrates compelling legitimate interest for the processing which overrides the data subject's interests, or for the establishment, exercise, or defence of a legal claim.

7.6.1 Such objections must be related to the individual circumstances of the data subject and the processing, and so each request will need to be dealt with on a case-by-case basis. Airtel Zambia may continue processing the data if it can prove an overriding justification for doing so. The DPO will administer objections to processing in conjunction with the relevant business area and, if necessary, IT Department.

Airtel will comply with a request for objection within 14 days of the request.

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7.7 The right to restriction of processing

14 days


Section 63 of the Data Protection Act provides for the right to restriction of processing. In certain circumstances data subjects have the right to require Airtel Zambia to restrict processing of their personal data. Data for which processing is restricted can be stored but not used in any other way unless the data subject consents.


7.7.1 The circumstances under which such restriction would be appropriate would include if the accuracy of the data were disputed by the data subject, if the data were being processed unlawfully but the data subject preferred restriction to erasure, where the legitimacy of the processing was under dispute between Airtel Zambia and the data subject or where the data subject required the data to be retained for longer than its retention schedule for the purposes of a legal dispute.

7.7.2 Where data has been restricted, Airtel Zambia has a duty to inform all third parties to whom the data has been disclosed, so long as the effort involved in doing so is not disproportionate. The data subject has the right to be informed of any such disclosures.

8. RISKS AND MITIGATIONS

| Risk | Impact | Mitigation/Control |
|------------------------------|---|---|
| Penalties for non compliance | <ul style="list-style-type: none"> • Lose of Revenue | <ul style="list-style-type: none"> • Data protection audit across the business • Training of staff |
| Reputation | <ul style="list-style-type: none"> • Lose credibility • Loss of customer confidence | <ul style="list-style-type: none"> • Training of staff • Continuous engagement with stakeholders |
| Operational Risk | <ul style="list-style-type: none"> • Possibility of company closure | <ul style="list-style-type: none"> • Aligning OPCO policy with group policy • Management should ensure compliance and adherence to policy guiding data processing |

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8.1 Appendix I

Request for Access to Personal Data Note:

- i. Documentary evidence in support of this request will be required.
- ii. Where the space provided for in this Form is inadequate, submit information as an annexure.
- iii. All fields marked as * are mandatory.

A. DETAILS OF PERSON REQUESTING

(This section provides details of the person requesting for personal data)

Name* _____

Staff Number* _____

Designation* _____

Email address* _____

Phone Number* _____

B. DETAILS OF THE PERSONAL DATA REQUESTED

Reason for access request:

Personal data being requested:

C. MODE OF ACCESS


- Inspect the record
- Listen to the record
- Have a copy of the record made available to me in the following format:
- Photocopy (please note that copying charges will apply);
number of copies required: _____
 - Electronic
 - Print copies (please note that printing charges will apply);
number of printouts required: _____
 - Other (specify) _____

D. DELIVERY METHOD

- Collection in person
- By e-mail (provide email address where different/ in addition to details provided above)

E. DECLARATION


Note: Any attempt to access personal data through misrepresentation may result in prosecution.

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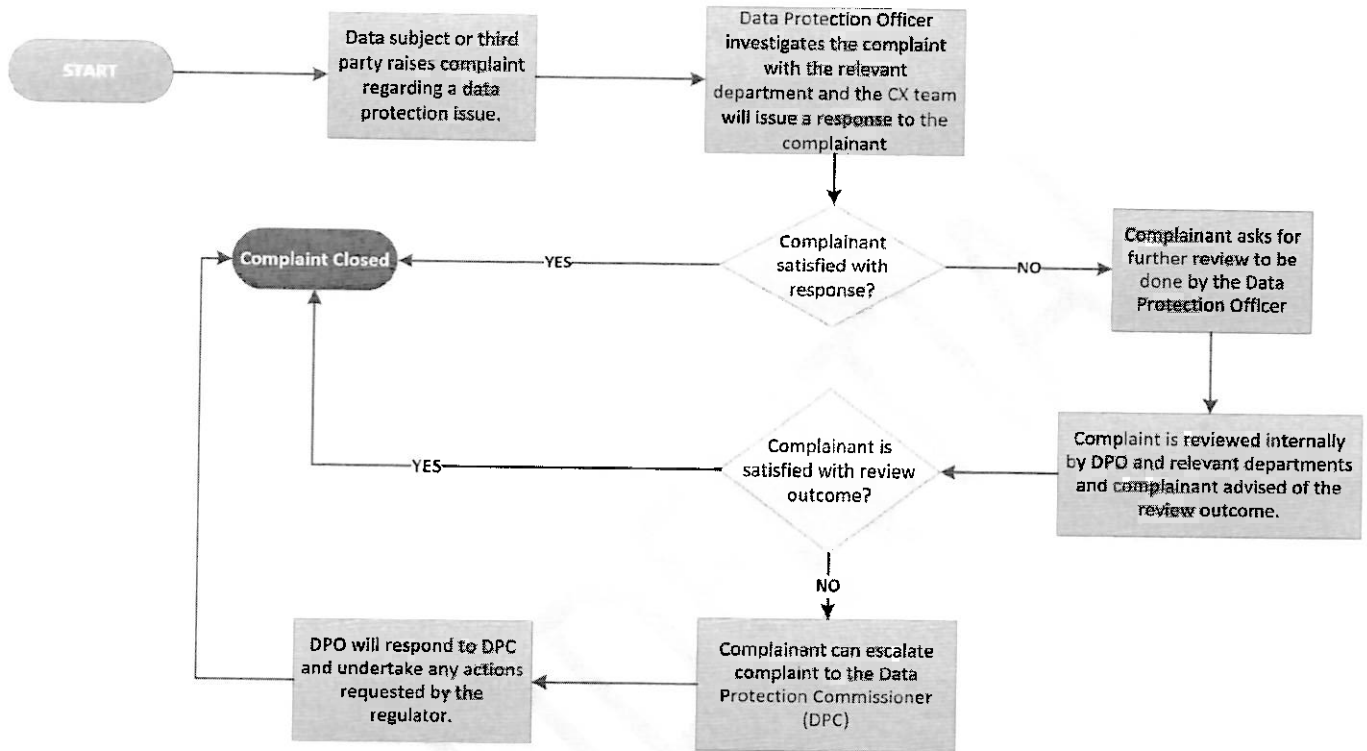
I certify that the information given in this application is true.


Signature: _____

Date: _____

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9.2 Appendix II



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9. REFERENCES

1. Data Protection Act of 2021
2. Complaint Handling Process