WHO ARE WE?
We are Vodacom Mozambique, SA (hereinafter referred to as "Vodacom")

a company incorporated under the laws in force in the Republic of Mozambique, under the legal entity number 14497, with its head office at Rua dos Desportistas, no. 649, Vodacom Building, in Maputo.

Unless otherwise specified in a separate privacy notice, the way your Personal Information is processed will remain compatible with the wording of this notice.

In this Privacy notice:

- "we/us" means Vodacom;
- "third party" means suppliers, business partners, registered NPOs and government departments;
- "Vodacom Group" means Vodacom Group Limited and any company or organisation in which Vodacom Group Limited owns more than 30% of the share capital;
- "Vodafone Group" means Vodafone Group Plc and any company or other organisation in which Vodafone Group Plc owns more than 15% of the share capital;
- "Personal Information" refers to Personal Information about your organisation and about you as defined in the GDPR and includes without limitation, company name, registration number, VAT number, directors, MSISDN (Mobile Station International Subscriber Director Number) information (a unique identifier which is linked to your mobile phone number), physical address, postal address, email address, and financial records etc.
- "Process or Processing" means to any operation or activity, whether automated or not, concerning Personal Information, including collection, receipt, recording, organisation, collation, storage, updating or modification, retrieval, alteration, consultation, use, dissemination by means of transmission, distribution or making available in any other form, merging, linking, as well as blocking, degradation, erasure or destruction of information.

HOW TO CONTACT US

Your opinion matters to us – if you have any questions about our Privacy notice or your privacy settings, please submit your query to the Privacy team at privacy@vodacom.co.mz and a member of our dedicated team will respond to you. If you would like to mail us by post directly, send it to:

head office at Rua dos Desportistas,
no. 649, Vodacom Building, in Maputo.

OUR PRINCIPLES

We are committed to respecting your organisation's and your privacy. We take privacy, security and complying with data protection and privacy laws seriously.

We have set out our core Privacy Commitments in our Privacy Policy. We aim to put these commitments at the heart of everything we do.

PERSONAL INFORMATION WE COLLECT ABOUT YOU

Directly from you
The information we collect about your organisation and how we collect it can vary depending on our interaction during the collaboration or provision of products or services, or how your organisation might have interacted with Vodacom even if there is no agreement between us, or what we have obtained from a third party.

We will collect your organisation or your Personal Information when you, for example:

- Solicit business from Vodacom;
- Respond to RFIs or RFPs with us;
- Enter into a partnership with us to provide services to other third parties or our customers;

- Engage in corporate social responsibility activities with us:
- Have given permission to other companies to share information about your organisation;
- Where your information is publicly available;
- Are the customer of a business that we acquire;
- Visit our business premises; or

From other third parties

Information collected not directly from you

Information we obtain from other sources, such as credit agencies, fraud-prevention agencies, and from other data providers. This includes demographic data, interest-based data, and internet browsing behaviour.
We are required to take all reasonably practicable steps to ensure your Personal Information is complete, accurate, not misleading and updated on a regular basis. To ensure this, we will always endeavour to obtain Personal Information from you directly. Where we are unable to do so, we will make use of verifiable independent third-party data sources who have the necessary authority to provide us with such information. We also collect information from certain organisations, where appropriate and to the extent we have legal grounds to do so. These include fraud-prevention agencies, business directories, credit check reference/vetting agencies, billing calculating agencies and connected network providers.

We may collect information about you from third-party sources when:

- you give us your consent (e.g., to do a credit check);
- we can find the information from a public record (e.g., the Deeds' Registry or CIPC records);
- we require the information to comply with a legal obligation (e.g., tax laws, anti-money laundering or bribery laws and other regulatory requirements);
- it is necessary to collect the information from a third-party source to maintain our legitimate interests; and
- it is in our legal interest not to collect the information from you (e.g., if we need to verify information about your directors' in a background check).
- Photographs and images when attending any of our events or functions or accessing premises with surveillance cameras;

HOW WE USE YOUR PERSONAL INFORMATION AND OUR LAWFUL BASIS TO DO SO

We will use your organisation's Personal Information for a number of purposes ranging from enabling us or your organisation to provide services we agreed on to ensure we are keeping these secure from fraud. If we use Artificial Intelligence (A.I.), we will do so responsibly, and where necessary we will disclose that the content is generated by A.I.

Whenever we use your organisation's Personal Information, we do so based on a specific lawful bases under data protection law listed below:

- **The performance of contract or to enter into the contract**. For example, provision of products or services to Vodacom or partnering to provide services to other third parties.
- **Vodacom's legitimate business interests** for example, fraud prevention, prevention of tax evasion and financial crime. Whenever we rely on this lawful basis to process your Personal Information, we assess our legitimate interest to make sure they do not override your rights. Additionally, in some cases you have the right to object to this processing. For more information, visit the "Your rights" section of this policy.
- **Compliance with a mandatory legal obligation**, including for example, where a particular law requires Vodacom to process Personal Information for a defined purpose.
- **Consent you provide** where Vodacom does not rely on another legal basis (referred to above). Consent may be withdrawn at any time. When you give your consent, you will be given details on how to change your mind or visit the "Your rights" section of this policy for more information.

Below you can find an overview of the categories of Personal Information (not an exhaustive list) we process about you and your organisation, the purposes for which we process that Personal Information and the lawful basis upon which we rely to conduct that processing.

a. To provide us with your service or collaborate on providing services to other third parties

It is necessary for us to process your Personal Information to enable us to collaborate with your organisation in providing products or services to other third parties or for us to receive products or services from you.

How is your information used?	What data is used?	Lawful basis
To process your order and provide you with your products and services	Basic Personal Information Contact details Account information Financial details	Performance of your contract
Payment for services provided	Financial details Basic company Information Contact details Account information	Contract
We provide sponsorships and donations to our other third parties	Financial details Basic company Information Contact details Account information	Legitimate interest
Corporate Social Responsibility – we provide support, services and aid to disadvantaged communities and victims of violence.	Financial details Basic company Information Contact details Account information	Legitimate interest
Profiling, Fraud Management and Security Credit checks and ID	Basic Personal Information Basic company information Financial details Account information Credential information	Consent
Fraud Prevention, Security and Debt Collection	Basic company Information Account information Financial details	Legitimate interest

b. To comply with mandatory legal obligation

Under certain circumstances, it is necessary for us to process your Personal Information in order to comply with the law, for example, when responding to law enforcement requests for data or to comply with tax requirements. which are subject to strict internal policies, procedures, and your right to restrict usage of your Personal Information, which control the scope of legal assistance to be provided. We are also required to also process your Personal Information pursuant to legislation including but not limited to the Financial Intelligence Centre Act, 38 of 2001 (FICA), the Regulation of Interception of Communications and Provisions of Communication-related Information Act 70 of 2002 (RICA), the Electronic Communications and Transactions Act, 2002 (ECTA), the Electronic Communications Act, 2005 (ECA), the Consumer Protection Act, 2008 (CPA), the Promotion of Access to Information Act, 2000 (PAIA), and the Cybercrimes Act, 2020.

HOW WE SHARE YOUR PERSONAL INFORMATION

Where applicable, we share information about your organisation with:

- Companies in the Vodacom and Vodafone Group, located across the globe, including but not limited to in the European Economic Area (EEA), Egypt, India and the US, for reporting purposes and where they are involved in providing products and services that you have signed up for;
- Partners, suppliers, or agents collaboratively involved in delivering products and services to our mutual customers;
- Companies who are engaged to perform services for, or on behalf of, Vodacom Group Limited, Vodafone Limited, or Vodafone Group which companies may be located outside of the borders of Mozambique;
- Credit reference, fraud-prevention or business-scoring agencies, or other credit scoring agencies;
- 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

INTERNATIONAL DATA TRANSFERS

Vodacom does transfer Personal Information of Data Subjects across the borders, including but not limited to countries in the European Union, United States of America, United Kingdom, India, Australia and to the Vodafone and Vodacom group companies and/or authorised third parties beyond the borders of the countries to achieve a defined purpose. The defined purposes include the i) achievement of its business functions, ii) provision of products and services that our mutual customer has requested, iii) hosting or storage of some of its systems and infrastructure, iv) data warehousing activities and for the v) provision of centralised business activities within the Vodafone and Vodacom group of companies such as where we share technology and resources.

Vodacom will only engage in the cross-border transfer of information if one of the following conditions are met and the transfer has been assessed and approved by the Deputy Information Officer:

- The recipient is subject to existing legislation in his /her/it's country, a binding corporate or binding agreement that provides an adequate level of protection for the Personal Information that is substantially similar to the data protection laws applicable to South Africa:
- The Data Subject has consented to such cross-border transfer;
- The transfer is necessary for the conclusion and/or performance of a contract between Vodacom and the Data Subject;
- The transfer is necessary for the conclusion or performance of a contract entered into, in the interest of the Data Subject, between Vodacom and the relevant Vodacom Group company or the Authorised Third Party;
- The transfer is to the benefit of the Data Subject and must take place in circumstances under which it is not reasonably possible to obtain the Data Subject's consent and if it were reasonably possible to obtain such consent, the Data Subject would be likely to give it.

The processing of Personal Information in a foreign jurisdiction may be subject to the laws of the country in which it is held, and may be subject to disclosure to the Governments, Courts of law, Enforcement or Regulatory Agencies of such other country, pursuant to the laws of such country. As a measure, Vodacom conducts Transfer Impact Assessments to assess the legislative framework that governs disclosures of information in jurisdictions where information is transferred and implements security and contractual measures to limit the risk exposure. However, where such disclosures are required, Vodacom will ensure the adequate protection of your Personal Information.

HOW LONG DO WE KEEP YOUR PERSONAL INFORMATION FOR?

We may not retain your Personal Information any longer than is necessary for achieving the purpose for which your Personal Information was collected or subsequently processed, unless:

- The retention of your Personal Information is required or authorised by law;
- We reasonably require your Personal Information for lawful purpose related to our function or activities;
- The retention of your Personal Information is required by a contract that we enter into with your organisation;

As a general rule, contract documentation and communication records are retained for a period of 5 years after termination of services. However, given other lawful and legitimate business needs the information may be retained longer to fulfil the business or legal requirements.

KEEPING YOUR PERSONAL INFORMATION SECURE

We have specialised security teams who constantly review, improve, and ensure the implementation of appropriate, reasonable technical and organisational measures to protect your Personal Information from unauthorised access, accidental loss, disclosure, or destruction. We are required in terms of POPIA to notify you and the Information Regulator, if any of your Personal Information has been compromised.

Communications over the internet (such as emails) aren't secure unless they've been encrypted. Your communications may go through a number of countries before being delivered, as this is the nature of the internet.

We cannot accept responsibility for any unauthorised access or loss of Personal Information that is beyond our control.

We'll never ask for your secure personal or account information by an unsolicited means of communication. You're responsible for keeping your personal and account information secure and not sharing it with others.

Our website may provide links to third-party websites. We cannot be responsible for the security and content of such third-party websites. You are therefore required to make sure you read that company's privacy and cookies policies before using or putting your Personal Information on their site.

The same applies to any third-party websites or content you connect to using our mutual products and services.

You may choose to disclose your information in certain ways such as social plug-ins (including those offered by Google, Facebook, Twitter and Pinterest) or using third-party services that allow you to post reviews or other information publicly, and a third party could use that information.

UNAUTHORISED THIRD-PARTY ACCESS TO YOUR INFORMATION

Despite the security measures we have in place to protect your Personal Information, (firewalls, password access and encryption methods) you acknowledge that it may be accessed by an unauthorised third party, e.g., as a result of an illegal activity.

In the unlikely event of such access, we will notify your organisation, where possible, via email, SMS or using the address you have provided us with, within a reasonable time of us becoming aware of such occurrence.

YOUR RIGHTS

Below we set out details on how you and your organisation can exercise your rights. If you have a question or cannot find the answer, please send an email to: Enablement@vm.co.mz

Right to access Personal Information

You have the right to request a record or description of the Personal Information that Vodacom holds about you. This includes the right to request Vodacom to confirm, free of charge, whether or not we hold any Personal Information about

you or your organisation; as well as information about the categories of third parties who have, or have had, access to your Personal Information. To make this request as an individual or an authorised third party, visit our Subject Access Rights page of this Privacy Portal which gives details on how to do this. Alternatively, you can contact our Customer Services team at 082 135.

Right to correct Personal Information

You have the right to correct information held about you or your organisation if it's not accurate, out-of-date, excessive, irrelevant, or misleading. If the information we hold about you is inaccurate or needs to be updated, you can send an email to: Enablement@vm.co.mz

To manage Cookies and understand more about what they are:

Want to disable a cookie, or understand more about what these are? Check the cookies section of this policy for full details on how to do this.

Right to object to use of Personal Information

You have the right, in certain circumstances, to object to Vodacom processing your Personal Information. In order for Vodacom to collaborate you, Vodacom is required to process your Personal Information and as such the provision of your Personal Information is mandatory and you may not object to same in order to continue using or collaborating with us on our products or services. For more information or to exercise this right, please contact our Customer Services team at 082 135. If this relates to an automated decision performed on you or organisation (this means with no human involvement), please let us know and we will review your request.

Right to restrict use of your Personal Information

If you feel that the Personal Information we hold on you or your organisation is inaccurate, or you believe we shouldn't be processing your Personal Information, please contact our Customer Services team on 082 135 to discuss your rights. In certain circumstances, for example where you contest the accuracy of your information, or where Vodacom no longer requires your information for achieving its purpose but must maintain it for purposes of proof, you have the right to ask us to restrict processing.

Right to deletion

Vodacom strives to only process and retain your Personal Information for as long as we need to. In certain circumstances, for example, where you indicate that your Personal Information is inaccurate, irrelevant, excessive, out of date, incomplete, misleading, or obtained unlawfully, you have the right to request that we erase your Personal Information that we hold. If you feel that we are retaining your Personal Information longer than we need, it is worth first checking that your contract with Vodacom has been terminated, which you can do with Customer Services on 082 135. If your contract with Vodacom has been terminated, we may still have lawful grounds to process your Personal Information.

Right to restrict use of your information

if you feel the personal information we hold about you is inaccurate or believe we shouldn't be processing your personal information, you may have the right to ask us to restrict processing that information.

Right not to be subject to automated decision-making

Under certain circumstances, you cannot be subject to decisions based solely on automated processing, including profiling, that may significantly affect you.

Right to institute civil proceedings

If you believe there has been interference with the protection of your personal information, you have the right to take civil action.

HOW TO LODGE A COMPLAINT

If you want to contact us about any of your rights or should you believe that Vodacom has used your Personal Information contrary to applicable law, you undertake to first attempt to resolve any concerns with Vodacom directly. Kindly contact the onboarding team Enablement@vm.co.mz.

Complaints email: Enablement@vm.co.mz

NOTIFICATION OF CHANGES TO PRIVACY POLICY

We are continually improving our methods of communication and adding new functionality and features to this Website and to our existing products and services. Because of these ongoing changes, changes in the law and the changing nature of technology, our data protection practices will change from time to time. If and when our data protection practices change, we will update this privacy policy to describe our new practices. If we do, we will notify you the next time you visit this site or interact with us through any of our other communication channels. We encourage you to check this page regularly. Please see all the history of changes in the section below:

History of Changes:

Section Heading	Changes	Date of Update
None	None	N/A

Last updated: **February 2026**