

M-Pesa Limited – Consumer Privacy Notice

Our Privacy Notice

Introduction

M-Pesa Limited ("we," "our," or "us"). We are committed to protecting your personal data and ensuring that your personal information is handled in accordance with the Personal Data Protection Act, 2022, and its regulations. This Privacy Notice explains how we collect, use, disclose, and protect your personal data when you visit our website https://www.vodacom.co.tz/mpesa , use our products and services.

You can find the privacy supplements for all our products and services please go to Privacy & Our Products & Services

Changes to our privacy notice

This Privacy Notice gets updated from time to time; whenever we make a change, we'll post this on our website and let you know.

Who we are

We are M-Pesa Limited, a subsidiary company of Vodacom Tanzania Plc

In this privacy notice:

- "we/us" means M-Pesa Limited and Vodacom Tanzania Plc;
- "third party" means someone who is not you or us;
- "partner organisation" means external third party business entity that provides value-added services; and
- "Vodacom Group" means Vodacom Group Plc and any company or other organisation in which Vodacom Group Plc owns more than 15% 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.

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

Our main switchboard is 0754100 100 or you can email us at customercare@vodacom.co.tz

How to contact us

Your opinion matters to us – if you have any questions about our privacy notice, you can email us at: Ask.Privacyteam@vodacom.co.tz or you call us on 100 or 101 or visit Vodacom shops or Customer Care Service desks

You can contact our Data Protection Officer at Ask.Privacyteam@vodacom.co.tz

Data protection principles

M-Pesa Limited is committed to respecting your privacy. We take privacy, security and complying with data protection and privacy laws seriously.

We have set out our core Privacy Commitments in this Privacy Notice. 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 you and how we collect it can vary depending on the products and services that you use and subscribe to, how you have used the products and services, and how you have interacted with M-Pesa even if you aren't a customer, or what we have obtained from a third party.

We will collect your personal information when you, for example:

- sign up to any of our products or services;

- use our network or other M-Pesa products or services;
- contact us through various channels for support or ask for information about products or services;
- visit or browse our website; and
- if you are a non-M-Pesa customer and contact a M-Pesa customer or a M-Pesa customer care team.

From third parties

Information collected not directly from you

Information we obtain from other sources, such as credit agencies, fraud-prevention agencies, National Identification Authority (NIDA) and from other data providers. This includes demographic data, interest-based data, and internet browsing behaviour. /Apple/Play store re user feedback]f

The types of information we may have, where applicable:

1. **Contact details** Such as your name, address, phone and/or mobile number and email address;
2. **Financial details** Information about your bank account and other banking information – for example, you'll have to give us this information when required upon request. We'll collect the data necessary to process a payment whenever we make a refund.
3. **Your traffic data**. This is data we see as part of providing you with the services like the number you use to send or receive money /the number used to send you money, date and time of transaction ; .
4. **Your location data** This can be precise where it uses Global Positioning System (GPS) data or by identifying nearby mobile phone masts and Wi-Fi hotspots and you enable location-based services or features. Or less precise where, for example, a location is derived from your IP address or data such as a post code or name of a town or city;
5. **Your contact with us** Such as a note or recording of a call you make to one of our contact centres, [a Live Chat], an email or letter sent, or other records of any contact with us;
6. **Your account information** Such as your date of birth, dates of payment owed or received, subscriptions you use, account numbers or other information related to your account or included in M-Pesa Application;
7. **Credential information** We'll collect, security information used for authentication and access to accounts and services;
8. **Your preferences** for products, services and lifestyle activities when you tell us what they are, or we assume what they are, based on how you use the products and services;
9. **Cookies** See the Cookie Policy for details on what we collect using cookies, web beacons and other technologies, including advertising data;
10. **Your browsing history** We collect your browsing history whenever you visit the Vodacom website on your mobile device or PC. You can opt out through Cookies Settings
11. **Information about how you use our products and services** Such as the level of service that you receive – for example, network or service faults and other events that may affect our network services or other services; or your viewing history if you use any of our online digital product, and your feedback collected through various customer surveys on the general usage of our services.
12. **Details of your use of the specific services or products**. You can refer to the specific privacy supplement for each product/service for more information on the data processed.

How we use your personal information and our lawful basis to do so

We will use your personal information for a number of purposes ranging from enabling us to provide you with the products or services you have requested to ensuring we are keeping these secure from fraud.

We may use Artificial Intelligence (A.I.) to help us provide you with a requested product or service. If we use 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 personal information, we do so based on a specific lawful bases under data protection law listed below:

1. **The performance of your contract or to enter into the contract and to take action on your requests** For example, when you send and receive money we process things like the numbers you use to send/receive money, the amount you send/ receive so we can provide you with the relevant services. This also enables us to generate your bill, based on your transactions. We also need to conduct credit checks when you apply for a product or service
2. **Legitimate interests of M-Pesa** for example, fraud prevention, maintaining the security of our network and services, direct marketing, and improvement of our services. Whenever we rely on this lawful basis to process your data, we assess

our legitimate interests 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 privacy notice.

3. **Compliance with a mandatory legal obligation** including for example accounting and tax requirements, law enforcement which are subject to strict internal policies and procedures (such as retention periods) .
4. **Consent where you have provided it by your own free will.** Where M-Pesa does not rely on another legal basis, you may withdraw this consent at any time. See below 'Your Rights' for more information on how to do this.

Third parties that we work with

We are not in the business of selling your data, we only share with suppliers and or third party or partner organisation who help us to provide services.

When you've purchased M-Pesa products and services using a third party or partner organisation, we often need to exchange information with them as part of managing that relationship and your account – for example, to be able to identify your order and be able to pay them and or provide you with our services you have requested.

If we have a contract with a service provider or contractor to provide us with services or provide a service on our behalf, they may have access to your personal information. We don't authorise them to use or disclose your personal information received from us except in connection with providing their services.

We collect and combine information in order to monitor your use of products and services, and that of our other customers, as well as to help us to improve the quality of our products and services.

Mergers and Acquisitions

If we reorganised or merged with or divested part of our business to another organisation we may need to provide your information to that other organisation or their advisers or receive personal information from that other organisation.

Third party products that you buy through your M-Pesa account

Where you buy a third-party product or service through your M-Pesa account, the contract for it is with the party selling that product or service. M-Pesa is only charging the amount directly to your bill as part of its arrangements with the seller. As part of this, you're agreeing that M-Pesa may pass certain personal information to the seller to complete your purchase with them.

The seller's terms and conditions and privacy and cookies policies will apply to how it uses your personal information – **please read them carefully.**

To provide you with your service

It is necessary for us to process your personal information to enable us to provide you with your service. By service we mean any services or products that you buy or use.

How is your information used?	What data is used?	Lawful basis
To process your request and provide you with your products and services • To process the products and services you've bought from us, and keep you updated with the progress of your request; • To provide the relevant products or services to you and to contact with you about changes to the products or services. • Where you've purchased M-Pesa products and services using a third party or partner organisation, we often need to exchange information with them as part of managing that relationship and your account – for example, to be able to identify your request and be able to execute the transaction .	E.g., Contact details Account information Financial details	Performance of your contract

Billing and Customer Care • To bill you for using our products and services, • To respond to any questions or concerns you may have about our network, products or services.	Account information Financial details Your contact with us	Performance of your contract
Service messages • We will contact you with customer service messages to keep you updated with current information about products and services you've purchased. For example, changes to our terms and conditions, price plan and data use, upgrade you might be entitled to, or service interruptions.	Contact details Account information	Performance of your contract

To improve our service

We collect information such as on your use of our products and services on an aggregated or anonymous basis in order to help us manage and improve the services we offer to everyone.

How is your information used?	What data is used?	Lawful basis
Improving and innovating our products and services	Financial details Traffic data	Legitimate Interest
Improving and innovating our products and services through third parties • We collect and combine information in order to monitor your use of products and services, and that of our other customers, as well as to help us to improve the quality of our products and services. We provide this information to third parties who we work with to provide you with our services.	Account information	Legitimate Interest
Manage our mobile money platform and understand mobile money usage • To protect our mobile platform and manage the volumes of transactions via USSD, Smart Applications. For example, we identify peak periods of use so we can try and ensure the platform can handle the volume at those times. • To understand how you use mobile money features & products and services. That way we can seek to review, develop and improve these, develop more interesting and relevant products and services, as well as personalising our products and services	Traffic data Location data	Legitimate Interest

Marketing and tailoring our service to you

We process your personal information for marketing and advertising purposes, such as to let you know about new products or services and send you special offers, as well as to help us tailor our service to you.

You can control your Marketing permissions and the data we use to tailor these communications at any time, you call us on 100 or 101 or visit Vodacom shops or Customer Care Service desks.

How is your information used?	What data is used?	Lawful basis
Marketing • We process this data for the purpose of sending you marketing communications in the manner outlined in the row below. We can further tailor these messages using your calling and messaging activities, location information and browsing information	Contact details Your preferences Browsing history Account information Location data	Legitimate Interest
Marketing • As our customer, we will keep you informed generally about new products and services, send you newsletters or white papers, invite you to participate in a survey or let you know about offers, promotions, prize draws or competitions. We tailor these messages based on the sorts of products and services you've bought from us • We'll contact you through, digital platforms , phone, SMS or push notifications through our apps and USSD.	Contact details Account information Questionnaire answers	Legitimate interest
Personalised/targeted advertising online • To deliver advertising that is relevant to you, you'll also see targeted advertising online based on the use of cookies. This is known as interest-based advertising. It can be on websites belonging to the Vodacom Group, those of other organisations as well as other online media channels such as social media sites. We may also combine data collected via the cookies with other data we have collected. If you don't want any information processed through the use of cookies, check our Cookies section. It explains how to control and opt out of cookies. • Remember that not providing consent for interest-based advertising won't stop advertisements from being displayed – but they won't be tailored to your interests.	Cookie data Browsing history Account information	Consent
Analytics We use a variety of analytics methods including what is commonly referred to as "Big data analytics". Big data analytics are mathematically driven analysis techniques on large and varied data sets (that is why it is "big" data) to uncover hidden patterns and hitherto unrevealed trends. At M-Pesa we take governance of big data analytics seriously. Our data scientists are required to comply with applicable data protection laws and internal technical security controls. We have a strict use case process that requires that privacy and data protection law checks are carried out before any use case commences. We have strict rules for anonymisation and de-identified techniques where appropriate. We use our analytics to: • to monitor how customers use our networks, products and services on an anonymous or personal basis where appropriate. • Provide reports to third parties (such reports don't contain information which may identify you as an individual).	Account information Location Data	Legitimate interest

Profiling, Fraud Management and Security

Profiling consists of the use of personal data in an automated form in order to evaluate certain personal aspects relating to an individual. We will process your personal information in this way for credit, fraud and security purposes.

How is your information used?	What data is used?	Lawful basis
Credit checks and ID • We will carry out a credit check when you apply for any products or services with us that require credit checks, such as loan products. • We will also use your personal information for identity verification purposes, for access to your account and for general account management. We sometimes supplement the information we collect about you with information from other sources to assess the accuracy of the information that we hold;	Financial details Account information Credential information	Performance of your contract
Fraud Prevention, Security and Debt Collection • We will process your traffic data to protect against and detect fraud, to protect and detect misuse or damage to our networks, to recover debts or trace those who owe us money resulting from the use of our services. Fraud management and law enforcement • We may be obligated to release information if it's reasonable for the purpose of protecting us against fraud, defending our rights or property, or to protect our legitimate interests or the interests of our customers.	Traffic data Account information Financial details	Legitimate interest
Network Security • We will process your traffic data in order to protect and detect misuse or damage to our networks or to detect and resolve fraudulent use of our networks and to solve technical issues you are experiencing.	Anonymous and aggregated contact details or credential related information Traffic data	Legitimate interest
Physical Security • We may use CCTV footage to safeguard our premises, stores and sites.	Images Video footage	Legitimate interest

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.

How is your information used?	What data is used?	Lawful basis	Legislation applicable
Accounting and tax requirements		Compliance with mandatory legal obligation	Tax Administration Act Income Tax Act Companies Act
Law enforcement purposes		Compliance with mandatory legal obligation	e.g. use of personal data for other purpose for compliance with the laws under The Personal Data Protection Act, 2022 National Payments system. Act and regulations 2015 Anti Money loundering act 2006 and regulations

			Financial Consumer Protection regulation 2019.
Complaint handling purposes		Compliance with mandatory legal obligation	Financial Consumer Protection regulation 2019.GN NO. 449B OF 2023 Personal Data Protection Complaints Settlement Procedures

How we share your personal information

Where applicable, we share information about you with:

- Companies in the Vodacom Tanzania Plc, Vodafone Group, Vodacom Group and M-Pesa Africa and their Affiliates
- Partners or agents involved in delivering the products and services you've ordered or used;
- Companies who are engaged to perform services for, or on behalf of, M-Pesa Limited, Vodacom Tanzania Plc, or Vodacom or Vodafone Group;
- Credit reference, fraud-prevention or business-scoring agencies, or other credit scoring agencies;
- Debt collection agencies or other debt-recovery organisations;
- 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;
- Emergency services (if you make an emergency call), including your approximate location;
- Third parties for joint promotions with that third party;
- Partner organisations we've carefully chosen so they can contact you about their products and services (which may or may not include M-Pesa products and services). We'll ask for your consent before sharing this information.
- Other third parties when you are signing up to their service and it is used by them for authentication and fraud-prevention purposes;
- Third parties that we use to serve you marketing.

International Data Transfers

We may need to transfer your information to other Vodacom Tanzania Plc, Vodacom Group, M-Pesa Africa and or Vodafone Group of companies or service providers in countries outside the United Republic of Tanzania. This kind of data transfer may happen if our servers (i.e. where we store data) or our suppliers and service providers are based outside the United Republic of Tanzania, or if you use our services and products while visiting countries outside the United Republic of Tanzania.

If M-Pesa sends your information to a country that is outside the United Republic of Tanzania, we will make sure that your information is properly protected and ensure that we comply with all legal and regulatory requirements. We will always ensure that there is a proper legal agreement that covers the data transfer. In addition, if the country is not considered to have laws that are equivalent to United Republic of Tanzania data protection standards then we will ask the third party to enter into a legal agreement that reflects those standards.

Children's Privacy

At M-Pesa Limited, we take the privacy of minors seriously. Our platform is designed to be used by individuals who are 18 years of age or older. However, we may collect personal data from individuals under the age of 18 (specifically from age 12 to 17) in certain circumstances, provided that we obtain the necessary consent from a parent or legal guardian.

Data Collection from Minors under 18 (12-17 years)

If you are under the age of 18 (12-17), you may only use our services with the consent of a parent or legal guardian. By providing your personal data, you confirm that you have obtained such consent, or that you are a parent or guardian providing consent on behalf of a minor.

We may collect personal data from users under the age of 18 (12-17) for the purpose of providing services such as mobile money transfers, account management, and customer support. This data may include basic identifying information such as, birth certificate, date of birth, image of the minor and contact information.

Measures in place to protect personal data

Parental Consent

If we collect data from individuals under the age of 18 (12-17), we will ensure that parental or guardian consent is obtained before processing their personal data. Parents and guardians have the right to access, rectify, or request the deletion of their child's personal information at any time.

To exercise these rights, as a parents or guardians please visit Vodacom shops or Customer Care Service desks, and we will take immediate action to address your concerns and requests in compliance with the Personal Data Protection Act, 2022.

If You Are a Parent or Guardian

If you are a parent or guardian of a minor under the age of 18 (12-17) and you believe your child has provided us with personal data without your consent, please visit Vodacom shops or Customer Care Service desks. We will take steps to remove such data and ensure the safety and privacy of your child's information.

Minor's Aging

When a minor turns 18, they must re-register using their own NIDA identity. M-PESA will notify the user three months before their birthday and provide a three-month grace period for re-registration

Failure to Re-Register

If the minor fails to re-register within the three (3) month grace period after reaching the majority age, M-Pesa will deactivate him/her from Vodacom network. This is in line with our policy of ensuring that only individuals of legal age have access to certain services.

Security Measures for minor's data (12-17)

To protect the privacy and safety of minors, M-Pesa automatically excludes individuals between the ages of 12 and 17 from marketing campaigns, loans, and gambling services at the time of onboarding. This measure ensures that minors do not receive unsolicited marketing materials or have access to services that may not be appropriate for their age.

Your Rights as a Parent or Guardian:

As a parent or legal guardian, you have the right to:

- Request access to your child's personal information.
- Request that we delete your child's personal information.
- Withdraw your consent at any time.

How long we keep your personal information for

We'll store your information for as long as we must by law. If there's no legal requirement, we'll only store it for as long as we need to.

We'll keep some personal information for a reasonable period after your contract with us has finished in case you decide to use our services again. We, or one of our partners, may contact you about M-Pesa services during this time if you haven't opted out of receiving marketing communications from us.

For information on how long we hold your personal data for, see our retention schedule.

Keeping your personal information secure

We have specialised security teams who constantly review and improve our measures to protect your personal information from unauthorised access, accidental loss, disclosure or destruction.

Communications over the internet (such as emails or M-Pesa App) 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 (such as Passwords) and not share t 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. So, 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 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.

Social plug-ins and social applications are operated by the social network themselves and are subject to their own terms of use and privacy and cookies policies. **You should make sure you're familiar with these**.

Your rights

Right to rectify personal data

You have the right to have information held about you corrected if it is not accurate. If what we hold on you needs updating, or you think it may be inaccurate, you can visit Vodacom shops or Customer Care Service desks to update it .

Right to access personal data

You have the right to make a request for a copy of the personal data that M-Pesa holds about you. To make this request as an individual or an authorised 3rd party, please visit Vodacom shops or Customer Care Service desks. We will take reasonable steps to confirm your identity before issuing any copy of your personal information.

Right to prevent processing likely to affect data subjects:

You are entitled to require M-Pesa to suspend or not to begin, processing of any of your personal data, if the processing of such personal data is likely to cause substantial damage to you or to another person. However, we may still be able to process your data in certain situations under specific conditions or legal requirements. You can visit Vodacom shops or Customer Care Service desks you can email us at customercare@vodacom.co.tz to discuss your rights.

Right to withdraw consent

You can withdraw your consent anytime after giving it. Depending on how you provided your consent you should be able to withdraw your consent in the same way. You can visit Vodacom shops or Customer Care Service desks.

Rights in relation to automated decision-making

You have a right to object to decisions made entirely by automated systems and to request for human intervention if the decision has legal consequences or significantly impacts you. Please visit Vodacom shops or Customer Care Service desks to exercise your right.

Right to compensation

You have a right to claim compensation from M-Pesa if it has been determined that your rights as a data subject have been infringed upon by reason of any contravention of any of the requirements of the Personal Data Protection Act.

Right to erasure, block or destroy

M-Pesa strives to only process and retain your data for as long as we need to. In certain circumstances where we no longer have a justifiable reason to continue to process your data or if not required by the law to retain such data, you can request we delete, block or destroy it. If your contract with M-Pesa has been terminated, we may still have lawful grounds to process your personal data (for more information on retention periods see How Long We Keep Your Personal Information For).

Exercising rights on behalf of a data subject

In certain cases, a third party (such as a legal guardian, attorney, or authorized representative) may represent the data subject and exercise any of the rights on their behalf. The third party is required to provide the below, and any additional information that may be requested:

- Proof of the data subject's identity (such as ID or passport)
- Identification documents for the third party
- Proof of the third party's authority to act on behalf of the data subject (e.g., power of attorney, court order)

Right to prevent processing of personal data for direct marketing

To opt out of Marketing messages:

If you no longer want to receive marketing messages from M-Pesa, you can elect to opt out of all marketing communications or only selected methods (email, SMS, phone or post).

There are various ways to opt out:

- Contact our customer services team – see the contact us page;
- Click the link at the end of a marketing email or text to unsubscribe;
- Tell the adviser if you receive a marketing call;
- 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;
  Email [(customercare@vodacom.co.tz)] for guidance.

Opting out does not mean that you won't any longer receive service-related messages. You will continue to receive those (unless we have indicated otherwise).

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 privacy notice for full details on how to do this.

How to lodge a complaint

If you want to contact us about any of your rights, contact our Customer Services: Call 100 or email customercare@vodacom.co.tz . You can also visit Vodacom shops or Customer Care Service desks.

For Privacy Concerns/Complaints: Email dataprotectionqueries@vodacom.co.tz or send a complaint to our physical address at Vodacom Tower, 7th Floor, Ursino Estate, Bagamoyo Road, P.O Box 2369, Dar es Salaam.

We will do our best to help but if you're still unhappy, you have a right file a complaint with the Personal Data Protection Commission (PDPC).