

# Our Privacy and Cookies Policy

## Changes to our privacy policy

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

We have revised our privacy policy as we are introducing some new features and new ways of working.

**Last updated: 01 October 2023**

## How to use this privacy and cookies policy

In this policy, we explain how we collect, use, share and protect your personal information when you use our products and services and our website.

## Who we are

We are M-Pesa Limited Company. We are the subsidiary company of Vodacom Tanzania Plc.

In this privacy policy:

- "we/us" means mean M-Pesa Limited ;
- "third party" means someone who is not you or us; 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.

Our registered office is 11<sup>th</sup> 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 138001296

Our main switchboard is 0754100 100 or you can email us at [customercare@vodacom.co.tz](mailto:customercare@vodacom.co.tz)

## How to contact us

Your opinion matters to us – if you have any questions about our privacy policy, you can email us at: [customercare@vodacom.co.tz](mailto:customercare@vodacom.co.tz)

## Our 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 our Privacy Centre. We aim to put these commitments at the heart of everything we do. Please see the privacy commitments section of this policy

## The basics

### Personal information we collect about 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 Limited even if you aren't a customer, or what we have obtained from a third party with permission to share it with us.

### **M-Pesa Limited will process your personal data based on:**

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. **M-Pesa's legitimate business interests**, 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 business 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 policy.
3. **Compliance with a mandatory legal obligation**, including for example accounting and tax requirements, which are subject to strict internal policies (such as retention periods), procedures, and your right to restrict usage of your data, which control the scope of legal assistance to be provided; or
4. **Consent you provide** where M-Pesa does not rely on another legal basis. Consent may be withdrawn at any time.

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

- Buy or use any of our products and services;
- Use our network or other M-Pesa products and services;
- Register for a specific product or service;
- Subscribe to newsletters, alerts or other services from us;
- Contact us through various channels, or ask for information about a product or service;
- Take part in a competition, prize draw or survey;
- Visit or browse our website or other Vodacom websites;
- Have given permission to other companies, such as our business or joint-venture partners as well as our third-party suppliers or contractors, to share information about you;
- Where your information is publically available; or
- Are the customer of a business that we acquire.

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 also collect information about you on CCTV when you visit Vodacom premises or on other security cameras as part of our security and crime prevention measures.

We use cookies (small text files stored in your browser) and other techniques such as web beacons (small, clear picture files used to follow your movements on our website). For more details on this and how to opt out of these, please see the Cookies section of this policy.

### **The types of information we may have are, where applicable:**

- Your name, address, phone and/or mobile number, your date of birth, gender and email address;
- Information about your bank account and other banking information – for example, you'll have to give us this information when you open an account with us. We'll collect the data necessary to process a payment whenever you make a purchase;
- 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 ;
- 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;

- 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;
- Your account information, such as dates of payment owed or received, subscriptions you use, account numbers or other information related to your account or included in M-PESA App; Credential information – we'll collect pin, hints and similar security information used for authentication and access to accounts and services;
- Your preferences for particular 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;
- See Cookies for details on what we collect using cookies, web beacons and other technologies, including ad data;
- 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'll also get 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;
- Details of your use of the specific services or products, for example:
  - Every time you access your M-Pesa account, a record is kept. This includes your name, your number, the number you send money to, date and time of transaction, and your approximate location at the time that the transaction takes place (based on the location of the nearest cell that you initiated the transaction from). The same is also recorded every time you receive any payment (money).

### **How we use your personal information**

We will use your personal information for the following purposes:

#### **1. To provide you with our service**

##### **Processing your order and provide you with our products and service**

- To process the products and services you've bought from us, and keep you updated with the progress of your order;

##### **Billing and Customer Care**

- To bill you for using our products and services, or to take the appropriate amount of credit from you;
- Contact you if the billing information you provided us with is about to expire or we're not able to take payment;
- To respond to any questions or concerns you may have about our network, products or services.

##### **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, roaming or service interruptions.

#### **2. To improve our service**

##### **Improving and innovating our products and services**

- We collect anonymous, de-identified or aggregate information in order to improve the service we offer to everyone. None of these analytics are linked back to you in any way.

- **Manage our mobile money platform and understand mobile money usage** To protect our core mobile money 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..

### **3. Marketing & tailoring our service to you**

#### **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 (for example, we know not to market to you if you're in the middle of your phone contract).
- We can further tailor these messages using your calling and messaging activities, location information and browsing information, if you have authorised that we process this information for this purpose;
- If you have given your permission, we will also contact you to let you know about products and services of M-PESA Limited and those of other companies which we think may interest you unless you opt out of such marketing messages from us;
- We'll contact you by post, online, phone or push notifications through our apps.
- You can control your Marketing permissions and the data we use to tailor these communications at any time when receiving marketing messages.

#### **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 M-PESA Limited or its Affiliates, those of other organisations as well as other online media channels such as social media sites. We may also combine data collected via 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 opting out of interest-based advertising won't stop advertisements from being displayed – but they won't be tailored to your interests.

#### **Research and 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 sign up to a Code of Ethics. 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 ensuring that personal information is anonymised or de-identified at the appropriate stage in the process.

We use our analytics to:

- Market research and to carry out research and statistical analysis including to monitor how customers use our networks, products and services on an anonymous or personal basis;
- Provide reports to third parties (such reports don't contain information which may identify you as an individual). These can be to third parties such as content providers and advertisers or as part of M-PESA Limited Analytics.

### **4. Automated decision-making and Profiling**

Automated decision making is the ability to make decisions by technological means without human involvement in order to evaluate certain personal aspects relating to an individual. We will sometimes need to profile you and process your personal information in this way for credit, fraud and security purposes.

### Credit checks and ID

- We will carry out a credit check when you apply for a contract for any products or services with us.
- 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;
- Data to be used: Financial details, Account information and Credential information

### Fraud Prevention & Security

- We will process your traffic data in order 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.
- Data to be used: Traffic data

### Network Security

- We will process your traffic data in order to protect and detect misuse or damage to our networks.
- Data to be used: Traffic data

### Physical Security

- We may use CCTV footage to safeguard our stores and sites.
- Data to be used: Images and Video Footage

### Debt Collection

- We will process your traffic data in order to recover debts or trace those who owe us money resulting from the use of our services.
- Data to be used: Account information and Financial details

If any of our products use personal information in automated decision making, it will be explained in the product specific privacy notice.

### How we share your personal information

#### Where applicable, we share information about you with:

- Vodacom Tanzania PLC or any other 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, Vodacom Group 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 advertise with, such as Facebook, in order to serve you advertisements online;
- Third parties that we use to serve you marketing.

### Fraud management and law enforcement

- We will release information if it's reasonable for the purpose of protecting us against fraud, defending our rights or property, or to protect the interests of our customers.
- We also may need to release your information to comply with our legal obligation to respond to the authorities' lawful demands. Your personal data shall only be provided when we in good faith believe we are obliged to do so in accordance with the law and pursuant to an exhaustive evaluation of all legal requirements.

### Mergers and Acquisitions

If we're reorganised or sold to another organisation we will provide your information to that organisation.

### Third parties that we work with

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 order and be able to pay them.

If we have a contract with a service provider or contractor to provide us with services or provide a service on our behalf, and they may have access to your personal information, we don't authorise them to use or disclose your personal information 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. We provide this information to third parties (for example, to content providers and advertisers) but any such third party reporting shall not include information which may identify an individual customer.

### International Data Transfers

We may need to transfer your information to other Vodafone Group 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 we will 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.

### How long we keep your personal information for

We'll store your information for as long as we have to by law. If there's no legal requirement, we'll only store it for as long as we need to. 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) 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. 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 Limited holds about you. To make this request as an individual or an authorised 3rd party, please visit Vodacom shops or Vodacom Customer Care Service desks.

### **Right to prevent processing likely to affect you or another person**

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. You can visit Vodacom shops or Vodacom Customer Care Service desks to exercise this right.

### **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, calling to customer care centre 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 [customer@vodacom.co.tz] for guidance.

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

To opt out of receiving marketing communications from other Vodacom Group companies, just contact them directly.

In some cases, you may receive marketing from M-Pesa, even if you're not a customer or never had contact with M-Pesa. This is a result of third-party marketing lists which M-Pesa may acquire from time to time. If you've registered to opt out of such marketing, you shouldn't receive such communications. If you do, we ask that you let us know immediately.

*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.

*To opt out of being included in M-Pesa Analytics, or to understand about what it means for you:*

While it can't identify or contact you, it's your choice whether you're included.

**How to lodge a complaint**

If you have a complaint, you can contact us on the details provided. We'll do our best to help but if you're still unhappy, you can contact the Personal Data Protection Commission.

**Rights in relation to automated decision making**

You have the right to require M-Pesa to ensure that any decision taken by or on behalf of you which significantly affects you shall not be based solely on the processing by automatic means.

**Right to erasure, block or destroy**

In some circumstances, such as 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.

**Right to compensation**

If your rights have been infringed by M-Pesa by reason of any contravention of any of the requirements of the Personal Data Protection Act, you are entitled to compensation from M-Pesa for that damage.

[Our cookie policy](#)

[How we use cookies](#)

We use cookies to keep track of what you've bought from us and what you've done on the site. Cookies also mean you can use services such as tracking your order, checking your account or topping up.

Our cookies don't hold personal information such as your name or bank details. They simply let us find information once you're logged in or help link your browsing information to you and your personal information when you choose to register for a service, white paper or newsletter.

To do this we sometimes use persistent cookies. We take looking after your personal information seriously – we're always monitoring and improving how we protect it.

We've put our cookies into the following categories, to make it easier for you to understand why we need them:

1. Strictly necessary – these are used to help make our website work efficiently
2. Performance – these are used to analyse the way our website works and how we can improve it
3. Functionality – these help to enhance your experience by doing things like remembering products you've added to your basket
4. Targeting/advertising – these are used to share some information with third parties who we advertise with, so we know how you've reached our website. We can also use cookies to identify the parts of the website you're interested in. We then use this information to show you adverts and pages we think may also be of interest to you, to tailor how we communicate with you, or to tailor the contents of the communications we send to you. If you prefer, you can opt out of these. Tailoring of content means it includes information reflecting the interest you've shown in the content of our web pages, or offers or promotions that we think may interest you, and to improve how we respond to your needs.

In addition to this, sometimes other Vodacom Group companies will add a cookie to show you adverts and pages which may be of interest to you. Details on these, and how to opt out if you prefer, can be found in the 'Third-party cookies' section of this page.

List of cookies we collect and what information they store.

#### **Cookie Name    Cookie Description**

FORM_KEY	Stores randomly generated key used to prevent forged requests.
PHPSESSID	Your session ID on the server.
GUEST-VIEW	Allows guests to view and edit their orders.
PERSISTENT_SHOPPING_CART	A link to information about your cart and viewing history, if you have asked for this.
STF	Information on products you have emailed to friends.
STORE	The store view or language you have selected.
USER_ALLOWED_SAVE_COOKIE	Indicates whether a customer allowed to use cookies.
MAGE-CACHE-SESSID	Facilitates caching of content on the browser to make pages load faster.
MAGE-CACHE-STORAGE	Facilitates caching of content on the browser to make pages load faster.
MAGE-CACHE-STORAGE-SECTION-INVALIDATION	Facilitates caching of content on the browser to make pages load faster.
MAGE-CACHE-TIMEOUT	Facilitates caching of content on the browser to make pages load faster.
SECTION-DATA-IDS	Facilitates caching of content on the browser to make pages load faster.
PRIVATE_CONTENT_VERSION	Facilitates caching of content on the browser to make pages load faster.
X-MAGENTO-VARY	Facilitates caching of content on the server to make pages load faster.
MAGE-TRANSLATION-FILE-VERSION	Facilitates translation of content to other languages.
MAGE-TRANSLATION-STORAGE	Facilitates translation of content to other languages.

#### **Cookies and you**

To make a purchase online or sign up to services like M-Pesa Tanzania App, you must have cookies enabled on your internet browser. The more popular browsers are:

- Internet Explorer
- Firefox
- Safari

- Google Chrome
- Opera

## **M-Pesa's Privacy Commitments**

**Customers entrust us with their privacy – whether it's the protection of their personal information, the confidentiality of their private communications or the way we develop our products and services.**

The way we handle their privacy is a vital part of our responsibility to customers and how we earn their trust.

We aim to create a culture at M-Pesa Limited where employees have a clear understanding of how important privacy is and how to ensure it is protected. Our Privacy Commitments set out the principles that govern our approach to privacy and how we engage with employees, partners and external stakeholders on relevant issues – such as designing products to protect privacy or assisting law enforcement.

### **Respect**

We value privacy because of its value to people. It's about more than legal compliance – it's about building a culture that respects privacy and justifies the trust placed in us.

### **Openness and Honesty**

We communicate clearly about actions we take that may impact privacy, we ensure our actions reflect our words, and we are open to feedback about our actions.

### **Choice**

We give people the ability to make simple and meaningful choices about their privacy.

### **Privacy by Design**

Respect for privacy is a key component in the design, development and delivery of our products and services.

### **Balance**

When we are required to balance the right to privacy against other obligations necessary to a free and secure society, we work to minimize privacy impacts.

### **Laws and Standards**

We comply with privacy laws, and we will work with governments, regulators, policy makers and opinion formers for better and more meaningful privacy laws and standards.

### **Accountability**

We are accountable for living up to these principles throughout our corporate family, including when working with our partners and suppliers.