

# USHINDI UENDELEE – privacy supplement

This privacy supplement gives some general information around the processing conducted for USHINDI UENDELEE product, to provide further context to our [main privacy policy](#). If you're using USHINDI UENDELEE together with another service, you should read the privacy information for the other service too.

If you have any queries in any aspect of this privacy supplement, please call 100 or visit our Vodacom shops or Customer Care Service desks and a member of our dedicated team will respond to you.

## USHINDI UENDELEE

Vodacom USHINDI UENDELEE is a gamified trivia which allows user to swipe their phone left and right to answer a question with a timer playing on the screen. The seamless gaming experience with visual questions on the screen makes it much more than a normal trivia game. The platform has been enabled with different sounds in every instance.

The trivia is interactive and gives both feature phones and smartphone users an engaging experience and an opportunity to get different gratifications based on their points.

Your data will be processed during subscription to store record and be able to display content which relates to your subscription. When you are browsing within the portal, your data will be processed by the devices you're browsing on (for example, remembering your browsing history).

To understand how to manage your cookie preferences, you can visit [allaboutcookies.org](#)

## Personal information we collect about you

### Information we collect about you

The types of information we process includes;

- Your mobile number
- Your account information, such as subscription type, payment method (airtime or M-Pesa), subscriber type, dates of payment and date of expiry of subscription
- Customer care information through your contact with us,
- Information about your usage of the App, such as how often you use it or when you dismiss alerts; and
- Your USHINDI UENDELEE service details in relation to the service that you would like to track,

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;
- We also collect anonymous analytics information on how users use the USHINDI UENDELEE product in order to improve your experience and troubleshoot.

### **When we collect your personal information**

We collect your personal information when:

- You first subscribe to the service
- You use the App or portal and any of its features
- You contact our customer care teams with a query.

Vodacom will process your personal data based on:

**The performance of your contract or to enter into the contract** and to take action on your requests. For example, we'll need to process your network traffic data as part of making your device "connected" and we'll need to process Administrator's payment details for your monthly billing.

**Vodacom's legitimate business interests**, for example, fraud prevention, maintaining the security of our network and services, direct marketing, and the 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.

**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.

**Consent you provide** where Vodacom does not rely on another legal basis. 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.

## How we use your personal information

### To provide you with your service

We use your information for service provision and to fulfil any purchases you have made:

- to help us identify you and any accounts you hold with us;
- to provide you access to the service
- billing and customer care;
- to notify you of any changes to the App or to our services that may affect you; and
- identity verification.

### Marketing and profiling

If you are opted into marketing and have given us permission to use your data to tailor these communications, we'll use your interactions with this App or portal to inform the sorts of marketing we should be sending you so that it's the most relevant for you. To opt out of Marketing messages or profiling:

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

There are various ways to opt out:

- Contact our customer care team by dialing 100;

- All our marketing messages come with an “unsubscribe” link which you can click to unsubscribe;
- Tell the adviser you no longer want to be marketed to, if you receive an outbound marketing call;
- Email [customercare@vodacom.co.tz](mailto:customercare@vodacom.co.tz) for guidance.
- Opting out does not mean that you won't any longer receive service-related messages, such as messages telling you about your order status or when our Terms and Conditions change. You will still continue to receive those (unless we have indicated otherwise). You may also receive marketing via push notifications if you have not turned them off via your App settings.

## **Service improvement**

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.

To protect our networks and manage the volumes of calls, texts and other uses of our networks. For example, we identify peak periods of use so we can try and ensure the networks can handle the volume at those times; and

To understand how you use our networks, 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 personalizing our products and services.

## **How we share your personal information**

Where applicable, we share information about you with:

- Companies in the Vodafone Group
- Partners, suppliers 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, Vodacom Tanzania Plc, or 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 organizations

- Law enforcement agencies, government bodies, regulatory organizations, courts or other public authorities if we have to, or are authorized to by law
- A third party or body where such disclosure is required to satisfy any applicable law, or other legal or regulatory requirement
- Third parties for joint promotions with that third party. They'll be responsible for their own compliance with applicable privacy laws

### **International data transfers**

We do not make international transfers of personal data outside Tanzania; All data is stored on a platform managed by Vodacom.

## **How long we keep your personal information for**

**To provide the service, billing and for authentication purposes**

Personal data detailed in previous sections will be kept for the time necessary to provide the service to the user.

### **Providing the service**

The data related to the operation data of the service or the network history described above will be kept for 90 days and then will be anonymized or deleted. Personal data related to the user and his network will be kept for the time in which the user has activated the service. They will be removed after 12 months after the user unsubscribes from the service.

### **Diagnostics services**

We will collect data in order to enhance your services. The types of data sets and the retention related to these data types can be seen in “Personal Information we collect about you” section.

For information about other data retention with Vodacom, please refer to our [main privacy policy](#)

## **Keeping your personal information secure**

We have specialized security teams who constantly review and improve our measures to protect your personal information from unauthorized 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 unauthorized 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**

Below we set out details on how you can exercise your rights. If you have a question or cannot find the answer, please visit our or visit our Vodacom shops or Customer Care Service desks for more information or call 100.

### **Right to correct personal data**

You have the right to correct information held about you if it's not accurate. If the information we hold about you is inaccurate or needs to be updated, please or visit our Vodacom shops or Customer Care Service desks for more information to update it.

### **Right to access personal data**

You have the right to make a request for a copy of the personal data that Vodacom holds about you. To make this request as an individual or an authorized third party, visit our Vodacom shops or Customer Care Service desks for more information on how to do this.

### **Right to object to use of personal data**

You have the right, in certain circumstances, to object to Vodacom processing your personal information. For more information or to exercise this right, please call 100 or visit our Vodacom shops or Customer Care Service desks. If this relates to an automated decision performed on you (this means with no human involvement), please let us know and we will review your request.

### **How to lodge a complaint**

If you want to contact us about any of your rights or if complain about how we use your information, contact our Customer Services team by calling 100 or email us at [customercare@vodacom.co.tz](mailto:customercare@vodacom.co.tz). We'll do our best to help

### **Right to restrict use of your data**

If you feel data we hold on you is inaccurate or believe we shouldn't be processing your data, please visit our Vodacom shops or Customer Care Service desks or you can email us at [customercare@vodacom.co.tz](mailto:customercare@vodacom.co.tz) to discuss your rights. In certain circumstances you will have the right to ask us to restrict processing.

### **Right to erasure**

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 it.