

**SELCOM PAYTECH LTD**

**Data Privacy and Procedure**





## Contents

1. Purpose
2. Scope
3. Definition
4. Policy Review
5. Policy Governance
6. Accountability
7. Right to inform
8. Right to Access
9. Right to rectify individual or corporate data
10. Right to erase
11. Right to restrict processing
12. Data Breach Notification
13. Document Control
14. Appendix

Change Request Form - <https://www.selcom.net/change-request-form>  
Privacy Form

### 1. Purpose

The purpose of the data privacy policy is to establish controls and processes to manage personal data for each individual and set rules regarding as follows

- Right of an individual to be left alone and have control over their personal data
- Procedures for proper handling, processing, collecting, and sharing of personal data
- Compliance with data protection laws

### 2. Scope

The scope of this policy refers to individual data being requested or handled for any legal purpose

### 3. Definition

There are a few terms that you need to be aware of as you read through this chapter

Term	Definition
Personal Data	means information relating to an individual who is directly or indirectly identifiable by name, identification document or through any physical or other characteristics or attributes, but does not include information having a bearing on the public functions of an employee of a public authority or any other person performing a function of a public authority
Records	include any recorded information regardless of form or medium created, received and maintained by any information holder in the pursuance of its legal obligations or in the transaction of its business and providing evidence of the performance of those obligations or that business
Processor	Processor is responsible for processing personal data on behalf of a controller.
Individual	An individual is 'identified' or 'identifiable' if you can distinguish them from other individuals
SAR	Subject to access request of information
Information	means any material which communicates facts, opinions, data or any other matter relating to the management, administration, operations or decisions of the information holder, regardless of its form or characteristics

### 4. Policy Review

- This policy will be reviewed as it is deemed appropriate, but no less frequently than every 12 months. Policyreview will be undertaken by Compliance Officer and Head of Technology and Software Department.

## 5. Policy Governance

- The following table identifies who within Selcom is Accountable, Responsible, Informed or Consulted with regards to this policy. The following definitions apply:
  - Responsible – the person(s) responsible for developing and implementing the policy.
  - Accountable – the person who has ultimate accountability and authority for the policy.
  - Consulted – the person(s) or groups to be consulted prior to final policy implementation or amendment.
  - Informed – the person(s) or groups to be informed after policy implementation or amendment.

Responsible	CEO, Compliance Officer and Head of Technology and Software Department
Accountable	All HOD are accountable on their individual Staff access
Consulted	Internal Compliance and Technology and Software Department
Informed	All Staff Internal and External

## 6. Accountability

- Complete data at Selcom is stored and retained as per NPS ACT by Central bank, Tax Authority and TCRA.
- Selcom has data storage implementation for all individual data as well as corporate customers, along with security measures in place to protect and secure data as per requirement set by NPS ACT.
- Selcom shall report any scenario in terms of data breach and record of any such incidents using incident management policy of the company.
- Consent letters, email and signed forms are critical documentation for processing requests and stored in secured manner and accessible upon request.
- Relevant staff are only allowed to access these data and upon request from the management.
- Where access to information is requested, the information holder to which the request is made shall, as soon as practicable but not exceeding thirty days after the request is received-
  - provide written notice to the person who made the request as to whether the information exists and, if it does, whether access to the information or a part thereof shall be given; and
  - If access is to be given, promptly give the person requesting access to the information or a part thereof in the manner prescribed under this Act



## 7. Right to inform

- Individuals have the right to be informed about the collection and use of their personal data. This is a key transparency, you must provide individuals with information including: your purposes for processing their personal data, your retention periods for that personal data, and who it will be shared with.
- You must provide privacy information to individuals at the time you collect their personal data from them. If you obtain personal data from other sources, you must provide individuals with privacy information within a reasonable period of obtaining the data and no later than one month.
- There are a few circumstances when you do not need to provide people with privacy information, such as if an individual already has the information or if it would involve a disproportionate effort to provide it to them.
- Information provided to people must be concise, transparent, intelligible, easily accessible, and it must use clear and plain language.
- Regular review, and where necessary, privacy information is updated. Any new data updated in the system to be notified to individual's attention before using the data for processing and relevant authorities such as Central Bank, TCRA and Schemes (Mastercard)

## 8. Right to Access

- Individuals have the right to access and receive a copy of their personal data, and other supplementary information. All requests should be in writing and signed document.
- A third party can also make a SAR on behalf of another person. This will only be possible if the Requestor is a regulatory body such as the BOT/NPS or TCRA or any relevant organization which has jurisdiction over Selcom or a party that has a direct agreement in the transaction process with Selcom and is bound by confidentiality, such as Mastercard.
- Requests for individual or corporate data may vary in terms response time depending on period and complexity of the requirement
- Transaction related data is available via Selcom Portal granted to financial institutions for a period of 1 year.
- All data is disclosed securely via secured password.
- Selcom may not provide information if there is any exemption or restriction applies, or if the request is manifestly unfounded or excessive.
- Minimum requirements for Access of information are Legal ID and Signed Letter which matches the KYC of the customer or an individual that resides at Selcom
- Selcom may impose charges or fee if the data is archived.

## 9. Right to rectify individual or corporate data

- Individual has the right to update or change his/her data based on evidence of these changes submitted. Selcom change management form will be required to update individual data, please refer to Appendix
- Selcom has the right of refusal the request if it does not meet the requirement of the updating required information. Such evidence needs to be presented by scanned copy and signature from relevant authorities.
- Any customer information which is being updated needs to be using following legal documents as proof.
  - NIDA (National Identity card)
  - Passport
  - TIN

## 10. Right to erase

- Any request for erasing data will not be accepted but strict polices will be considered with such requests.
- As per Tanzanian Local authority, data cannot be erased but to be retained for 30 years and to make it available where necessary
- Selcom complies with local authority requirement as mandatory action. Please refer to documentation and retention policy about data.

## 11. Right to restrict processing

- Restrictions of individual or corporate data can only be notified or entity requesting such requirement is done by Authorized persons from the company or any legal entity based on evidence.
- All such request must be in writing and approved by Selcom before implementing such as restrictions
- Restrictions can be rejected if they do not meet the requirements as per AML, Mastercard, Central Bank or any other legal authority

## 12. Data Breach Notification

- Selcom is obliged to abide by all relevant Tanzanian legislation including Mastercard if any data related to Mastercard Network. The requirement to comply with this legislation shall be devolved to employees and agents of Selcom who may be held personally accountable for any breaches of information security for which they may be held responsible.

## 13. Document Control

Date	Version	Requester	Tech. Writer	Change/Review
21-06-2017	V1.0	Sameer Hirji	Mohammedjawaad Kassam	Sarah Mohamed
01-03-2021	V1.1	TPRM by MPTS	Incorporating Mastercard requirements	Sarah Mohamed



**14. Appendix**

**Change request form – Available over Selcom website, which required to signed by requestor**

**Data privacy access form – Available on demand or requirements basis**



## SUBJECT ACCESS REQUEST FORM

Please complete this form if you would like Selcom to provide you with a copy of any personal data we hold about you. You are entitled to receive this information.

We will also provide you with information about any processing of your personal data that is being carried out, the retention periods which apply to your personal data, and any rights to rectification, erasure, or restriction of processing that may exist and any applicable regulatory restrictions, where applicable.

We will endeavor to respond promptly and in any event within one month of the latest of the following:

- Our receipt of your written request; or
- Our receipt of any further information we may ask you to provide to enable us to comply with your request.

The information you supply in this form will only be used for the purposes of identifying the personal data you are requesting and responding to your request. The more information you provide on this form, the quicker we will be able to process your request.

### Section 1: Details of Requestor

Title (Mr/Ms)		
Family Name	First Name	Last Name
Address		
Mobile Number		

### Section 2: Are you the subject?

Subject: Yes/No
Yes: I am the data subject. I enclose proof of my identity (see below).
No: I am acting on behalf of the data subject. I have enclosed the data subject's written authority and proof of the data subject's identity and my own identity.
Note: If we are not satisfied you are who you claim to be, we reserve the right to refuse to grant your request.

I am enclosing the following copies as proof of identity (please tick):

- NIDA
- TIN Certificate
- Proof of Address

### Information Request for:

Please describe the information you are seeking. Please provide any relevant details you think will help us to identify the information you require.



+255 22 2150254 | +255 766 190001 | info@selcom.net | www.selcom.net



Selcom Tanzania | 8th Floor, Uhuru Heights | Bibi Titi Mohamed Road, 33 Kibasisi | 11102 Upanga Mahuriki Jala CBD | P.O. Box 20656 Dar es Salaam, Tanzania





#### Request Data Format

I wish to (please tick):

- Receive the information in electronic format (some files may be too large to transmit electronically, and we may have to supply in CD format)
- Receive the information by post\*
- Collect the information in person
- View a copy of the information only
- Go through the information with a member of staff

\*Please be aware that if you wish us to post the information to you, we will take every care to ensure that it is addressed correctly. However, we cannot be held liable if the information is lost in the post or incorrectly delivered or opened by someone else in your household. Loss or incorrect delivery may cause you embarrassment or harm if the information is 'sensitive'.

Documents which must accompany this application:

- Evidence of your identity (see section 2)
- Evidence of the data subject's identity (if different from above)
- Authorization from the data subject to act on their behalf (if applicable)

Please return the completed form to:

Selcom Paytech Limited  
8<sup>th</sup> Floor, Uhuru Heights  
Bibi Titi Mohamed Road  
33 Kibasila, 11102 Upanga Mshariki  
Ilala CBD  
P.O. Box 20656  
Dar es Salaam, Tanzania

And share a copy of the form with the Compliance Officer on [info@selcom.net](mailto:info@selcom.net)

#### Correcting Information

If after you have received the information you have requested, you believe that:

- the information is inaccurate or out of date; or,
- we should no longer be holding that information; or
- we are using your information for a purpose of which you were unaware.
- we may have passed inaccurate information about you to someone else

Please inform the Compliance Officer accordingly who will provide guidance on next steps.

#### Declaration:

I understand that any attempt to mislead may result in prosecution.

I confirm that I have read and understood the terms of this subject access form and certify that the information given in this application to Selcom Paytech Limited is true. I understand that it is necessary for Selcom Paytech Limited to confirm my / the data subject's identity and it may be necessary to obtain more detailed information to locate the correct personal data.

Name: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_



+255 22 2150254 | +255 796 190901 | [info@selcom.net](mailto:info@selcom.net) | [www.selcom.net](http://www.selcom.net)

Selcom Tanzania | 8th Floor, Uhuru Heights | Bibi Titi Mohamed Road, 33 Kibasila | 11102 Upanga Mshariki Ilala CBD | P.O. Box 20656 Dar es Salaam, Tanzania