



PRIVACY POLICY

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1. Introduction

- 1.1 This website is owned by IPT Africa Ltd (hereafter “**IPT Africa**”, “**we**”, “**us**”, “**our**”).
- 1.2 This notice applies where we are acting as a data controller and data processor with respect to the personal data of our clients and website visitors.
- 1.3 We are committed to protecting your personal data. As a result, we would like to inform you regarding the way we would use your personal data, as is required by the European Union General Data Protection Regulation (hereafter the “**GDPR**”) where applicable and the Data Protection Act 2017 (hereafter the “**DPA**”).
- 1.4 We recommend you read this Privacy Notice so that you understand our approach towards the use of your personal data.
- 1.5 Our Privacy Notice sets out the types of personal data we collect, how we collect and process that data, who we may share this information with and the rights you have in this respect.

2. Who we are

- 2.1 IPT Africa Limited (**IPT Africa**) is a regulated payment provider headquartered in Mauritius, that uses payments technology to connect to the world’s emerging markets. **IPT Africa** focuses on building software and resources that empower companies with the tools to significantly improve the way they make payments through reduced costs, transparency, and multiple delivery options.
- 2.2 We are registered in Mauritius under registration number C131303.
- 2.3 Our principal place of business is at Socota Building, Phoenix, Mauritius.
- 2.4 **IPT Africa** is registered with the Data Protection Office and appears on the Data Protection Office Register as a controller of personal data.
- 2.5 **IPT Africa** is also registered with the Data Protection Office as a data processor and has the Registration Number of **P816**.

3. Personal data we may collect about you

- 3.1 The type of personal data we collect will depend on the purpose for which it is collected and used. We will only collect data that we need for that purpose.
- 3.2 We collect your personal data in the following ways:
 - (a) When you give it to us **directly** for e.g., you correspond with us and provide us with your information via email, via the Request for a Demo form on our website or you visit our premises.
 - (b) When we obtain it **indirectly** such as through social media platforms.
 - (c) When you browse and/or interact on our **website**.
- 3.3 The types of personal data that we collect, and process are detailed below:

- I. We collect the personal data of our customers that are provided to us at onboarding. These mainly include name, email address, telephone number, address, date of birth, nationality, identification documents (and your attached personal data) and your signature amongst others.
- II. Personal data collected from our website users include names and email addresses.

4. Cookies

We use cookies on our website and platform, IPT-X. Insofar as those cookies are not strictly necessary for the proper functioning of our website and the provision of our services on IPT-X, we will ask you to consent to our use of cookies when you first visit our website and platform. Please refer to our cookie banner which elaborates on the aspects of cookie usage and the purposes for which we use cookies.

5. How we use your personal data

5.1 **IPT Africa** will only use your personal data for the purposes for which it was collected or agreed with you. We will not use your personal data for any automated individual decision-making which will have a significant impact on you.

We use your personal data mainly to interact with you; provide you with support services; make it easy to navigate our website; improve our website and our products; and offer you content and services that might interest you.

5.2 We also use your personal data where the processing is necessary to establish or administer our services to you:

- Communicate with you regarding support services and provide you with critical service updates;
- Allow you to register for our services;
- Provide you with technical and customer support, and enable the provisioning of services; and
- Determine the region you are connecting from.

Lastly, we may use your personal data, where required by applicable law.

6. Legal basis for processing your personal data.

6.1 We process your personal data based on one or more of the following legal bases:

- **Contractual Necessity:** Processing is necessary for the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract.
- **Legal Obligations:** Processing is necessary to comply with our legal obligations.
- **Legitimate interests:** Processing is necessary for our legitimate interests or the legitimate interests of a third party provided that such interests are not overridden by your rights and interests.
- **Consent:** Processing is based on your explicit consent which you can withdraw at any time.

7. Disclosure of personal data

7.1 We share your personal data with third parties which assist us in fulfilling our responsibilities regarding our business relationship with you and for the purposes listed above. **IPT Africa** may disclose your personal data to the following third parties:

- a) We make certain personal data available to third-party service providers and agents who provide services to us (such as our cloud service providers and marketing companies). When we share with these third parties, we do so on a need-to-know basis and under clear contractual terms and instructions for the processing of your personal data.
- b) We are also required to disclose your personal data where processing is necessary for us to comply with our legal obligations, including responding to legal processes or lawful requests or where:
 - We have a duty or a right to disclose in terms of law or for national security and/or law enforcement purposes;
 - We believe it is necessary to protect our rights;
 - We need to protect the rights, property or personal safety of any member of the public or a customer of our company or the interests of our company; or
 - You have given your consent.

7.2 We require our service providers and other third parties to keep your personal data confidential and that they only use the personal data in furtherance of the specific purpose for which it was disclosed. We intend to have written agreements in place with our processors to ensure that they comply with these privacy terms.

8. Transferring of data abroad

8.1 Your personal data may be transferred to and processed in countries other than your own.

8.2 These transfers would always be made in compliance with data protection laws. Data transfers do not change any of our commitments to safeguard your privacy and your personal data remains subject to existing confidentiality obligations.

8.3 If we transfer your personal data to other countries which provide a lower level of protection, we will ensure that there are appropriate safeguards in place concerning the protection of your data, such as by using appropriate contractual data processing agreements.

9. Personal data security

We prioritise the security of your personal data and take appropriate technical and organisational measures to protect it from unauthorised access, disclosure, alteration, or destruction. We employ a combination of physical, administrative, and technological safeguards to ensure the confidentiality, integrity, and availability of your data. Here are some of the security measures we have implemented: Access controls, encryption, secure storage, incident response, and employee training amongst others.

10. Your data protection rights

You have certain rights regarding your personal data as detailed below and we are committed to respecting and facilitating the exercise of these rights:

- **Right of Access:** You have the right to request access to the personal data we hold about you. This includes the right to obtain confirmation of whether we process your personal data and to receive a copy of that information.
- **Right to Rectification:** If you believe that the personal data we hold about you is inaccurate or incomplete, you have the right to request that we correct or update it.
- **Right to Erasure:** In certain circumstances, you may have the right to request the erasure of your personal data. This includes situations where your personal information is no longer necessary for the purposes for which it was collected, or you withdraw your consent and there is no other legal basis for processing.
- **Right to Restriction of Processing:** You have the right to request the restriction of processing of your personal data under certain conditions. This means we will temporarily suspend the processing of your personal data, such as when you contest its accuracy or when you object to the processing.
- **Right to Data Portability:** If the processing of your personal information is based on your consent or the performance of a contract, you may have the right to request a copy of your personal information in a structured, commonly used, and machine-readable format. You may also have the right to transmit this data to another data controller.
- **Right to Object:** You have the right to object to the processing of your personal data for certain reasons, such as direct marketing or legitimate interests. If you exercise this right, we will no longer process your personal data unless we can demonstrate compelling legitimate grounds that override your interests, rights, and freedoms.
- **Right to Withdraw Consent:** If we rely on your consent as the legal basis for processing your personal data, you have the right to withdraw your consent at any time. This will not affect the lawfulness of processing based on consent before its withdrawal.

To exercise your rights or if you have any privacy-related inquiries or complaints, please contact us using the information provided at the end of this notice. We will respond to your request as required by applicable data protection laws.

11. Changes to this privacy notice

We may update this notice from time to time to reflect best practices in data management, security and control and to ensure compliance with any changes or amendments made to the **DPA** and any laws or regulations thereof.

12. Contact details

- 12.1 The primary point of contact for questions relating to this privacy notice, including any requests to exercise your legal rights, is our Data Protection Officer who can be contacted by email, at dpo@iptafrica.com.
- 12.2 If you believe we have not handled your request appropriately, you have the right to make a complaint to the Data Protection Office.