

1. Introduction

This website is owned by Mauritius Network Services Ltd. (hereafter "**MNS**"), and is operated, hosted and maintained by us.

We are committed to safeguarding the privacy of our website visitors and service users. 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**") and the Data Protection Act 2017 (hereafter the "**DPA**"). We recommend you read this Privacy Notice so that you understand our approach towards the use of your personal data.

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.

This notice applies where we are acting as a data controller with respect to the personal data of our website visitors, physical site visitors, service users, service providers and their representatives, clients and potential clients to whom we provide trainings, among others. As data controller, we determine the purposes and means of the processing of that personal data. We also comply with our obligations as a data processor under the DPA and the GDPR.

By using our website, you acknowledge that you have read and understood the terms of this Privacy Notice.

In this notice, "we", "us" and "our" refer to MNS.

2. Who we are

MNS was incorporated in Mauritius in 1994 to assist the Government of Mauritius in streamlining its services in order to increase its efficiency to benefit citizens and businesses. MNS provides online platforms which offers our customers the means to complete their transactions electronically. MNS also offers data centre services to host and operate the solutions, as well as help desk support as a centralised location for problem reporting and resolution.

3. The personal data we collect

The type of 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.

We may collect, process, and transfer your personal data including:

Categories of Personal Data	Details
Contact details	First name, surname, username, user ID, physical address, email address, phone number
Identification details	Identity card number; Passport Number for non-Mauritian citizens.
Financial information	Payment details, bank details
Other	CCTV footage, helpdesk call recordings

4. How we collect your personal data

The circumstance in which we may collect your personal data occurs when:

- You use any of our services
- You offer to provide, or provide services to us
- You correspond with us, or provide any information directly to us
- You visit MNS's premises
- You browse and/or interact on our website
- You enrol in our training sessions
- You call our Helpdesk department in case you require technical assistance for efficient use of our services

Where you provide us with personal data on behalf of a third party, you confirm that the third party has consented to the disclosure of his personal data to MNS.

5. We use cookies

Our website uses cookies. You may refer to our Cookie Policy to understand in details the aspects of cookie usage and the purposes for which we use cookies.

6. How we use your personal data

MNS will only use your personal data for the purposes for which it was collected or agreed with you. We have set out below the legal basis of processing for each purpose.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your personal data. Please contact our Compliance Officer if you need details about the specific legal ground, we are relying on to process your personal data where more than one ground has been mentioned below.

- We may process data about your use of our website and services for the purposes of improving our website, compiling anonymous statistics on such website usage, of keeping our services up to date, and of monitoring compliance with our policies and standards. We may also process settings that you have previously saved on the MNS websites. The legal basis for this processing is our legitimate interests, namely of analysing, monitoring and improving our website, services and communications and your legitimate interests as well, as it will help enhance your user experience when using our website.
- We may process your personal data that are provided to us in the course of use of our services for the purposes of registration of users to access our services, notifying you about changes to our services and providing maintenance and support services. The legal basis of this processing is for the performance of a contract between you and us, namely the Network Service Agreement.
- We may process personal data, namely contact and identification details for the purposes of administering and managing our relationship with you, of record keeping and of verifying your identity when there is a request to access/ rectify/ restrict/ delete information we hold on you. The legal bases of such processing are for the performance of a contract we have with you and for compliance with a legal obligation to which we are subject to, that is, to verify the identity of a data subject who requests access.
- We may process personal data in any requests, complaints, comment or enquiries you submit to us regarding our services for the purposes of replying you and taking appropriate measures relating to maintenance and support services. The legal basis for this processing is for the performance of a contract we have with you.
- We may process personal data such as your contact and financial details relating to our transactions, including when we purchase goods or services from you, for the purposes of administering and managing our relationship with you, of carrying out our obligations

arising from any contracts entered between you and us, for procurement and invoicing purposes and for audit and record keeping purposes. The legal bases of such processing are for the performance of a contract between you and us and for compliance with legal obligations to which we are subject to, for example to audit our financial statements.

- We may process CCTV footage captured on our premises for the purposes of protecting our premises and property, protecting your personal safety when you are on our premises, identifying any misconduct or disciplinary infringements in our compound, assisting in providing evidence for such misconduct, for investigating, detecting or preventing crime, and for apprehending and prosecuting offenders. The legal basis for this processing is for our legitimate interests of ensuring physical security and proper conduct on our premises.
- We may process call recordings captured during your interaction with our Helpdesk team for the purposes of identifying common customer issues, improve your customer experience, settling disputes and help standardize communication processes with customers. The legal basis for this processing is for our legitimate interests of ensuring internal quality assurance and dispute settlement.
- In addition to the above-mentioned specific purposes for which we may process your personal data, we may also process any of your personal data where such processing is necessary for compliance with legal and regulatory requirements which apply to us, or when it is otherwise allowed by law, or when it is in connection with legal proceedings.

7. Disclosure of personal data

We will not sell or disclose your personal data without your consent.

We may only disclose your data:

- Where we have a duty or a right to disclose in terms of law
- Where we believe it is necessary to protect our rights

We may share your personal data with third parties such as bankers, lawyers and auditors, for the purposes listed above.

8. We may transfer your personal data

MNS may transfer personal data outside Mauritius as may be necessary for the purposes mentioned above. If we transfer your personal data to other countries, we will ensure that there are appropriate safeguards in place with regard to the protection of your personal data. Those transfers would always be made in compliance with the GDPR and the DPA.

If you would like further details of how your personal data would be protected if transferred outside of Mauritius, please contact our Compliance Officer by referring to section 13.

9. Personal data security

MNS is legally obliged to provide adequate protection for the personal data we hold and to stop unauthorised access and use of personal data. We will, on an on-going basis, continue to review our security controls and related processes to ensure that your personal data is secure.

Our security policies and procedures cover:

- Access to personal data
- Computer and network security
- Software development security policy
- Protection of physical records
- Backup of data
- Investigating and reacting to security incidents
- Physical security
- Use and misuse of IT assets

When we contract with third parties, we impose appropriate security, privacy and confidentiality obligations on them to ensure that personal data that we remain responsible for, is kept secure.

We will ensure that anyone to whom we pass your personal data agrees to treat your data with the same level of protection as we are obliged to.

10. Your data protection rights

Under the GDPR/DPA, you have rights we need to make you aware of. The rights available to you depend on our reason for processing your information.

10.1 Your right to erasure of your personal data

You have the right to ask us to delete your personal data in certain circumstances:

- When we no longer need your personal data;
- If you initially consented to the use of your personal data, but have now withdrawn your consent;
- If you have objected to us using your personal data, and your interests outweigh ours;
- If we have collected or used your personal data unlawfully; and
- If we have a legal obligation to erase your data.

Where we collect personal data for a specific purpose, we will not keep it for longer than is necessary to fulfil that purpose, unless we have to keep it for legitimate business or legal reasons. Upon the determined expiry date, we will securely destroy your personal data. Retention periods are indicated in Annex A's Records Retention and Disposal Schedule. When we delete data from our servers, no residual copies remain on our servers. Data from our backup tapes are also deleted depending on the next scheduled backup overwrite which may be on a weekly, monthly or yearly basis in accordance with its configuration.

10.2 Your right of access to your personal data

You have the right to request a copy of the personal data we hold about you. To do this, simply contact our Compliance Officer (refer to section 13) and specify what data you would like. We will take all reasonable steps to confirm your identity before providing details of your personal data.

You will not have to pay a fee to access your personal data (or to exercise any of your other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

10.3 Your right to rectification of your personal data

You have the right to ask us to update or correct your personal data if you think it is inaccurate or incomplete. We will take all reasonable steps to confirm your identity before making changes to personal data we may hold about you. We would appreciate it if you would take the necessary steps to keep your personal data accurate and up-to-date by notifying us of any change we need to be aware of.

10.4 Your right to restriction of processing

You have the right to ask us to limit how we use your data. If necessary, you may also stop us from deleting your data. To exercise your right to restriction, simply contact our Compliance Officer (refer to section 13), say what data you want restricted and state your reasons. You may request us to restrict processing of your personal data in the following circumstances:

- If you have contested the accuracy of your personal data, for a period to enable us to verify the accuracy of the data;

- If you have made an objection to the use of your personal data;
- If we have processed your personal data unlawfully but you do want it deleted;
- If we no longer need your personal data but you want us to keep it in order to create, exercise or defend legal claims.

10.5 Your right to object to processing

You also have the right to object to us processing your personal data where your data is being used:

- For a task carried out in the public interest;
- For our legitimate interests;
- For scientific or historical research, or statistical purposes; or
- For direct marketing.

We currently process personal data for our legitimate interests, and contractual and legal obligations. You should contact our Compliance Officer (refer to section 13) to inform that you are objecting to any more processing of your personal data and state in your objection why you believe we should stop using your data in this way. Unless we believe we have strong legitimate reasons to continue using your data in spite of your objections, we will stop processing your data as per the objection raised.

10.6 Your right to data portability

The right to data portability allows you to ask for transfer of your personal data from one organisation to another, or to you. The right only applies if we are processing information based on your consent or performance of a contract with you, and the processing is automated. You can exercise this right with respect to information you have given us by contacting our Compliance Officer (refer to section 13). We will ensure that your data is provided in a way that is accessible and machine-readable.

10.7 Your right to withdraw consent

To the extent that the legal basis for our processing of your personal information is consent, you have the right to withdraw that consent at any time. Withdrawal will not affect the lawfulness of processing before the withdrawal.

If you wish to exercise any of the rights set out above, please contact our Compliance Officer (refer to section 13).

11. Definition of personal data

Personal data is any data from which you can be identified and which relates to you.

12. Changes to the Privacy Notice

This Privacy Notice may be updated from time to time and we will notify you of same by email or through automatic pop-ups on our website. This version is dated 09 July 2020.

13. Contact us

We have appointed a Compliance Officer to oversee compliance with and questions in relation to this Privacy Notice. If you have any questions about this Privacy Notice, including any requests to exercise your legal rights, please contact us (by email or by letter) using the details set out below:

Christopher Choo
Mauritius Network Services Ltd.
Silicon Avenue
Cybercity, Ebene, 72201
Republic of Mauritius
Email: christopher.choo@mns.mu

You have the right to complain to the Data Protection Office if you believe we have not handled your request in an appropriate manner.

Annex A: Records Retention and Disposal Schedule

Categories of Personal Data	Purpose of processing	Retention period
Contact details	Invoicing providers service	7 years after termination of contract with customers
	Trainings	2 months
	Data Subject Access Request Form	2 years after the Subject Access Request has been closed
Identification details	User registration	7 years after termination of contract with customer
Financial information	Invoicing providers service	7 years after termination of contract with customer
CCTV footage	Security, Investigation, detection & prevention of crime	3 months
Helpdesk call recordings	Internal assurance & quality dispute resolution	3 months