

1. Introduction

This website is owned by Mauritius Network Services Ltd. (hereafter "**MNS**", "we", "us" and "our"), 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.

2. Who we are?

MNS was incorporated in Mauritius in 1994 to assist the Government of Mauritius in streamlining its services 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. Definition of personal data

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

4. 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, fax number
Individual details	Sex (male/female), date of birth, age, language, Employment history and professional background, Signature, Photographs/videos
Identification details	Identity card number; Passport Number for non-Mauritian citizens; registration car number.
Financial information	Payment details, bank details
Physical security information	Information recorded in MNS' visitors' logbook (reason for visit, organisation name, identification measures used, date and time of visit), CCTV footage.
Other	helpdesk call recordings

5. 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
- We may collect your personal data in connection with recruiting in the following ways:
 - When you provide personal data to us directly for e.g., when you give us your Curriculum Vitae; information you provide to us via our career page on our website, emails and phone calls, interviews; and
 - When you made your personal data publicly available on platforms such as LinkedIn or other job recruiting sites; and
 - When your personal data is provided to us by a third party, for e.g., a recruitment agency or a previous employer or through our employee referral program.

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.

6. We use cookies

Our website uses cookies. You may refer to our Cookie Policy which is found [here](#)

to understand in detail the aspects of cookie usage and the purposes for which we use cookies.

7. 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 Data Protection Officer on dpo@mns.mu if you need further details.

Purpose of processing	Legal basis of processing
- For improving our website, compiling anonymous statistics on such website	- Legitimate interests, namely of analysing, monitoring, and improving our website, services and communications and your

<p>usage, of keeping our services up to date, and of monitoring compliance with our policies and standards.</p> <ul style="list-style-type: none"> - Process settings that you have previously saved on the MNS websites 	<p>legitimate interests as well, as it will help enhance your user experience when using our website.</p>
<ul style="list-style-type: none"> - For registration of users to access our services. - To notify you about changes to our services and to provide you with maintenance and support services. 	<ul style="list-style-type: none"> - For the performance of a contract between you and us, namely the Network Service Agreement.
<ul style="list-style-type: none"> - For administering and managing our relationship with you. - For record-keeping and for verifying your identity when there is a request to access/rectify/restrict/delete information we hold on you. 	<ul style="list-style-type: none"> - For the performance of a contract that 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.
<ul style="list-style-type: none"> - For replying to your requests, complaints, comments or enquiries you submit to us regarding our services and for taking appropriate measures relating to maintenance and support services. 	<ul style="list-style-type: none"> - For the performance of a contract that we have with you.
<ul style="list-style-type: none"> - For procurement (Purchasing goods or services) and invoicing purposes. - For audit and record keeping purposes. 	<ul style="list-style-type: none"> - 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.
<ul style="list-style-type: none"> - For security purposes namely for 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, 	<ul style="list-style-type: none"> - For our legitimate interests of ensuring physical security and proper conduct on our premises.

<p>detecting, or preventing crime, and for apprehending and prosecuting offenders</p>	
<p>- For identifying common customer issues, to identify common issues when assisting customers in the user registration/deregistration process, improve your customer experience, settling disputes and help standardize communication processes with customers (call recordings captured during your interaction with our Helpdesk team and our Customer Service Team).</p>	<p>For our legitimate interests of ensuring internal quality assurance and dispute settlement.</p>
<p>- For recruitment purposes in order to communicate with you and analyse your qualifications.</p>	<ul style="list-style-type: none"> - Consent (Reference Check) - The processing is necessary to perform a contract or to take steps at your request, before entering a contract, namely your contract of employment. - For our legitimate interests namely for the proper administration of our business and to ensure appropriate job candidates are being recruited.

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.

8. 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.

9. 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 Data Protection Officer (hereafter “**DPO**”) by referring to section 14.

10. 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.

11. 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.

11.1 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 DPO (refer to section 14) 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.

11.2 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.

11.3 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.

11.4 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 DPO (refer to section 14), 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.

11.5 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 DPO (refer to section 14) 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. We shall continue the processing of your personal data despite the objection raised where we have strong compelling legitimate reasons including the establishment, exercise or defence of a legal claim.

11.6 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 DPO (refer to section 14). We will ensure that your data is provided in a way that is accessible and machine-readable.

11.7 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.

Note:

- (a) If you wish to exercise any of the rights set out above, please contact our DPO (refer to Section 13).
- (b) We try to respond to all requests within one month. However, it may take us longer than a month if your request is particularly complex or you have made several requests. In this case, we will notify you and keep you updated.
- (c) Click [here](#) to download the Data Subject Rights Request Form.

12. Records Retention and Disposal

We will only keep personal data for as long as it is necessary to fulfil the purpose outlined in this privacy notice and even after we have ceased our relationship with you for the period mentioned in the below table.

Categories of Personal Data	Purpose of processing	Retention period
Contact details. Individual details, Identification details	Invoicing from service providers Invoicing to clients NDA	7 years
	Proposals/Tenders Comparison Sheets	5 years after termination of contract
	Trainings	7 years
	Data Subject Access Requests	2 years after the Subject Access Request has been closed
	User registration/deregistration , User account modifications	7 years after termination of contract with customer
Contact details	Visitors' Logbook	2 years
Financial information	Invoicing service providers	7 years after termination of contract with customer
CCTV footage	Security, Investigation, detection & prevention of crime	3 months
Qualification, Professional Background and Employment History	For recruitment purposes	For unsuccessful candidates, 1 year

Voice Recording	Helpdesk/Customer Service call recordings for internal quality assurance & dispute resolution	6 months
Cookies	For improving our website	Session cookies: Upon termination of the session Persistent cookies: Defined in the Cookie Policy

13. Changes to the Privacy Notice

This Privacy Notice may be updated from time to time to reflect changes in the law or our privacy practice and we will notify you of same by email or through automatic pop-ups on our website. This version is dated 28 September 2022.

14. Contact us

We have appointed a Data Protection 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:

Data Protection Officer
Mauritius Network Services Ltd.
Silicon Avenue, Cybercity, Ebene, 72201, Republic of Mauritius
Email: dpo@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.