

MINERALS MARKETING

C O R P O R A T I O N O F
Z I M B A B W E

Data and Website Privacy Notice

1. Introduction

Your privacy is of paramount importance to the Minerals Marketing Corporation of Zimbabwe (MMCZ). As the statutory body responsible for marketing Zimbabwe's mineral wealth, we are deeply committed to protecting and respecting the privacy of our stakeholders, including mineral producers, buyers, government partners, employees, and visitors to our digital platforms. This Data and Website Privacy Notice outline how we collect, use, store, and protect personal data in compliance with the **Zimbabwe Cyber and Data Protection Act (Chapter 12:07 of 2021)** and other applicable regulations. By using this website and our services, you consent to the collection and use of your information as described in this notice.

2. Scope

This notice applies to all personal data collected through:

- The official MMCZ website (www.mmcz.co.zw).
- Other digital platforms, portals, and online services operated by MMCZ (e.g., partner portals, tender platforms).
- Electronic interactions with MMCZ, including email correspondence, online forms, and digital applications.

3. Data Controller

When you interact with www.mmcz.co.zw or our digital services, the Minerals Marketing Corporation of Zimbabwe ("we," "us," "our," or "the Corporation") is the Data Controller.

This privacy notice applies to the processing of personally identifiable information (PII) or 'personal data' by all MMCZ departments, divisions, and business units.

We, along with our authorised third-party service providers, collect certain technical information about your use of our website.

4. Data We Collect

We may collect the following categories of personal data:

A. Information You Provide Directly:

- **Business and Identification Information:** Company name, personal name, title, physical address, phone number, email address, national ID, passport number, tax identification numbers.
- **Commercial Data:** Mineral production details, export license numbers, contract information, banking details for payment processing, transaction history.
- **Enquiry and Correspondence Data:** Information provided when contacting us via web forms, email, or portal messages.

B. Information Collected Automatically:

- **Technical & Usage Data:** IP address, browser type and version, device information, operating system, referral source, length of visit, page views, and website navigation paths. This is collected via cookies and similar technologies (see Section 7).

5. How We Use Your Data

Your data is used strictly for legitimate business and regulatory purposes, including:

- **Contract and Transaction Execution:** To facilitate mineral sales contracts, process payments, and manage commercial relationships.
- **Regulatory Compliance and Reporting:** To fulfil our statutory reporting obligations to relevant government ministries (e.g., Ministry of Mines and Mining Development, Reserve Bank of Zimbabwe).
- **Stakeholder Communication:** To respond to your inquiries, send official notices, tender alerts, and market updates relevant to your engagement with MMCZ.
- **Website and Service Improvement:** To analyse website performance, ensure security, and enhance user experience.
- **Security and Fraud Prevention:** To protect our digital assets and prevent unauthorized access or cyber threats.

6. Legal Basis for Processing

We process your personal data on one or more of the following lawful bases as defined by the ZCDPA:

- The performance of a contract to which you are a party.
- Compliance with a legal obligation to which MMCZ is subject.
- The legitimate interests of MMCZ in conducting its statutory mandate, where such interests are not overridden by your data protection rights.
- Your explicit consent, which you may withdraw at any time (for specific, non-contractual communications).

7. Cookies and Similar Technologies

Our website uses cookies, small text files stored on your device, to distinguish you from other users, enhance site functionality, and analyse performance.

Types of Cookies We Use:

- **Strictly Necessary:** Essential for the website to function (e.g., security, basic navigation). These cannot be disabled.
- **Analytical/Performance:** Help us understand how visitors interact with our site (e.g., Google Analytics). This data is aggregated and anonymised.
- **Functionality:** Remember choices you make (like language preference) to improve your experience.

You can control cookie settings through your browser. Disabling certain cookies may affect website functionality. We do not use cookies for behavioural advertising.

8. Data Sharing and Disclosures

We do not sell, trade, or rent your personal data. We may share it only under these circumstances:

- **With Government Authorities:** As required by law for regulatory oversight, audit, or statutory reporting (e.g., Ministry of Mines, Zimbabwe Revenue Authority, Reserve Bank of Zimbabwe).
- **With Essential Service Providers:** Trusted third-party processors who provide services on our behalf (e.g., secure cloud hosting, payment gateways, IT maintenance). These partners are bound by strict contractual data protection clauses.
- **For Legal Reasons:** If required to disclose information to defend our legal rights, comply with a court order, or prevent fraud/cybercrime.

9. Data Security Measures

MMCZ implements stringent technical and organisational measures to protect your data, aligned with ISO 27001 principles and the ZCDPA, including:

- Encryption of data in transit via Transport Layer Security (TLS) and at rest for sensitive information.
- Strict access controls and role-based permissions.

- Regular security audits, vulnerability assessments, and penetration testing.
- Secure development practices for our digital platforms.

10. Data Retention

We retain personal data only for as long as necessary to fulfil the purposes for which it was collected, including for the duration of our commercial relationship, to comply with legal and statutory archiving requirements (which may be extended for minerals trade records), and for the establishment, exercise, or defence of legal claims. A detailed Retention Schedule is maintained by the Data Protection Officer.

11. International Data Transfers

As an entity engaged in international trade, some data may be transferred to and processed in countries outside Zimbabwe. Where such transfers occur, we ensure they are protected by appropriate safeguards, such as Standard Contractual Clauses approved by the Data Protection Authority, or occur only to countries deemed to provide an adequate level of data protection.

12. Your Rights Under the ZCDPA

You have the following rights regarding your personal data:

- **Right of Access:** To request a copy of your personal data we hold.
- **Right to Rectification:** To correct inaccurate or incomplete data.
- **Right to Erasure:** To request deletion of your data under specific circumstances.
- **Right to Restrict Processing:** To limit how we use your data.
- **Right to Data Portability:** To receive your data in a structured, machine-readable format.
- **Right to Object:** To object to processing based on our legitimate interests.
- **Rights related to Automated Decision-Making:** To not be subject to decisions based solely on automated processing.

To exercise these rights, please contact our Data Protection Officer using the details in Section 15.

13. Third-Party Websites

Our website may contain links to external sites (e.g., government portals, industry associations). This privacy notice applies only to MMCZ's digital assets. We are not responsible for the privacy practices or content of external websites. We encourage you to read the privacy notice of any site you visit.

14. Notice Updates

We may update this notice periodically to reflect changes in our practices, technology, legal requirements, or our services. The updated version will be posted on our website with a revised "Effective Date." We encourage you to review this page periodically.

15. Contact Information and Data Protection Officer

For all questions, concerns, or requests regarding this Privacy Notice or your personal data, please contact our designated Data Protection Officer (DPO):

The Data Protection Officer

Minerals Marketing Corporation of Zimbabwe

90 Mutare Road, Msasa

Harare, Zimbabwe

Email: dpo@mmcz.co.zw

Phone: +263242487200-4