



PRIVACY POLICY

Introduction

Data protection is a matter of trust, and our customer's trust is important to us. Habari Node Limited ("We," "Our" Or "Us") is committed to protecting your privacy. This Privacy Policy explains how your personal information is collected, used, and disclosed by Habari Note Limited. The Privacy Policy applies to our website, customer portals, mobile applications, and associated subdomains (collectively, our "Service"). By accessing or using our Service, you signify that you have read, understood, and agreed to our collection, storage, use, and disclosure of your personal information as described in this Privacy Policy and our Terms of Service.

Definitions and Key Terms

For this Privacy Policy:

- Customer: refers to the company, organization, or person who signs up to use the Habari Note Limited Service to manage relationships with your consumers or service users.
- Personal Data: Any information that directly, indirectly, or in connection with other information – including a personal identification number, allows for the identification or identifiability of a natural person.
- Service: refers to the Service provided by Habari Note Limited as described in the relative terms and on this platform.
- Company: when this Policy mentions "Company," "we," "us," or "our," it refers to Habari Note Limited and is responsible for your information under this Terms & Conditions.
- Device: any internet-connected device such as a phone, tablet, computer, or any other device that can be used to visit Habari Note Limited and use the services.



- **IP address:** every device connected to the internet is assigned to a number known as an Internet Protocol (IP) address. These numbers are usually assigned in geographic blocks. An IP address can often be used to identify the location from which a device connects to the internet.
- **Cookie:** small amount of data generated by a website and saved by your web browser. It is used to identify your browser, provide analytics, remember information about such as your language preference or login information.
- **Country:** where Habari Note Limited or the owners/founders of Habari Note Limited are based, in this case, is Tanzania.
- **Staff:** refers to those employed by Habari Note Limited or are under contract to perform a service on behalf of one of the parties.
- **Third-party Service:** refers to advertisers, contest sponsors, promotional and marketing partners, and others who provide our Content or whose products or services we think may interest you.
- **Website:** Habari Note Limited site, which can be accessed via this URL: www.habari.co.tz
- **Mobile App:** refers to any application designed by Habari Note Limited to run on a mobile device such as a phone or tablet.
- **Customer Portal:** any digital information center designed by Habari Note Limited to give its customers access to services and information they need.
- **You:** a person or entity that is registered with Habari Note Limited to use the Services.

Information Collected

We collect your personal information with your knowledge and consent when you register for a specific product or Service, subscribe to our Services, visit our site, respond to a survey, or fill out a form.

- Name /username
- Password
- Phone numbers
- Email address
- Your contact details, such as social media handles, phone numbers, and emails
- Your account information, such as your bundle package, top-ups, subscriptions, billing statement, and invoices
- Your call data records phone numbers that you call or send messages to, log of calls, messages, or data sessions on the Habari Node network, and your approximate location



- When you use Habari Node WIFI, we collect phone numbers and provide user names and access codes. We record the device address and log data usage, duration, and date sent/received.

How We Use Information Collected

Any of the information we collect from you may be used in one of the following way:

- To enhance your experience (your information helps us to better respond to your individual needs)
- To process transactions
- To administer a promotion, survey, or other sites, and system feature
- To send SMS and periodic emails
- To improve our Service (we continually strive to improve our service offerings based on the information and feedback we receive from you)

Disclosure of Information

We may share your personal information with our current and future affiliated companies. We may involve trusted third-party service providers to implement functions for us, such as hosting. We will likely share your personal information, and possibly some non-personal information, with these third parties to enable them to perform these services for you and us.

We receive information from third parties, e.g., receiving information from a third party that provides automated network intrusion detection services.

We may share portions of our log file data, including IP addresses, for analytics purposes with third parties such as web analytics partners. If your IP address is shared, it may be used to estimate general location, connection speed.

We may also disclose personal and non-personal information about you to the government or law enforcement officials as we, in our sole discretion, believe necessary or appropriate to respond to claims, legal process, to protect our rights and interests or those of a third party, the safety of the public or any person, to prevent or stop any illegal, unethical, or legally actionable activity, or to otherwise comply with applicable court orders, laws, rules, and regulations.

Where and When We Collect Information From Customers

We will collect the personal information that you submit to us. We may also receive personal information about you from third parties as described above.

Email Address

We only send emails to people who have authorized us to contact them directly. We do not send unsolicited commercial emails because we hate spam as much as you do. Email addresses submitted



only through the Service subscription process will be used for the sole purpose of sending you subscription information and updates about your subscription.

Transfer of Information

We are incorporated in Tanzania. Information collected via our website, mobile applications, and customer portals through direct interactions with you or our help services may be transferred outside Tanzania from time to time. We will make sure that your information is adequately protected per the applicable Data Protection Laws.

Security of the Information

We take precautions to protect the integrity and confidentiality of your information. We have physical, electronic, and managerial procedures to help safeguard, prevent unauthorized access, maintain data security, and correctly use your information. We enforce measures to ensure integrity and confidentiality of your data via controls around information classification, access control, cryptography, physical and environmental security, and monitoring and compliance.

Updating and Correcting Information

You can contact us to update or correct your data, change your package subscription, change your preferences with respect of communications and other information that we maintain. To protect your privacy and security, we may take reasonable steps such as request information from you to verify your identity before making any changes or corrections to your account.

Your Rights

Subject to legal and contractual exceptions, you have rights under The Personal Data Protection Act No. 11 of 2022, under Article 16 of the Constitution of the United Republic of Tanzania, 1977. These are listed below:

- 🕒 Right to be informed of data collection and processing as well as the purpose involved;
- 🕒 Right to access the data collected and processed;
- 🕒 Right to object the processing of personal data collected where such processing will lead to adverse impacts;
- 🕒 Right to rectify personal data to ensure its accuracy;
- 🕒 Right not to be subject to automated decision making. A data subject has the right to instruct that decisions made by data collectors and processors on their behalf should not be arrived at, solely based on automated processing; and
- 🕒 Right to compensation.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your Personal Data.

Data Retention Period



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P.O Box 1215, 23101, Arusha, Tanzania

www.habari.co.tz

We keep your information only so long as we need it to provide Service to you and fulfill the purpose described in this Policy. We will only retain your Personal Data for as long as reasonably necessary to fulfill the purposes we collected it for, including to satisfy any legal, accounting, tax, regulatory, or reporting requirements. We may retain your Personal Data for a more extended period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for Personal Data, we consider the personal data's amount, nature, and sensitivity. The potential risk of harm from unauthorized use or disclosure of your Personal Data, the purposes for which we process your Personal Data, and whether we can achieve those purposes through other means.

Anonymized information that can no longer be associated with you may be held indefinitely.

Data Storage Protection

Habari Node Limited implements various security measures to maintain your personal data's safety when you subscribe to our services, submit information, or access your account. We offer the use of a secure server. All supplied sensitive information is transmitted via Secure Socket Layer (SSL) technology then encrypted into our Database only to be accessed by the authorized user required to keep the information confidential.

Your Consent

By using our services, registering an account, or making a purchase, you consent to this Policy Privacy

Cookies

We use cookies to identify the areas of our website that you have visited. A cookie is a small piece of data stored on your computer or mobile device by your web browser. We use cookies to personalize the content you see on our website, mobile application, and customer portals. The type of information gathered is non-personal such as the Internet Protocol (IP) address of your computer, MAC address, the date and time of your visit. We may also use this data in aggregate form to develop customized services - tailored to your interests and needs. You can disable cookies depending on the browser you are using. However, if you disable Cookies, you may not be able to access functionality on our sites correctly or at all.

Marketing

You may be required to opt-in or give any other form of explicit consent before receiving marketing messages from us. You can ask us to stop sending you marketing messages at any time by writing to us



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at support@habari.co.tz or by following the opt-out links on any marketing message sent to you or by attending to us or contacting us at any time through the provided contacts.

Where you opt-out of receiving these marketing messages, this will not apply to Personal Data provided to us as a result of a product, subscribed Service, warranty registration, product or Service experience, or other transactions.

Credit Card and Payment Data

Regarding any credit card or other payment processing details you have provided us, we commit that this confidential information will be stored in the most secure manner possible.

Governing Law

The Personal Data Protection Act No. 11 of 2022, under Article 16 of the Constitution of the United Republic of Tanzania, 1977, shall govern this Policy and your use of our services. Your use of our services may also be subject to other laws. The Act Principles include requirements such as:

- Personal Data should only be collected to fulfill a specific purpose, and it should only be used for that purpose.
- Personal Data collected must be processed in a fair, legal, and transparent manner
- Data subjects have the right to access their own Personal Data. They can also request a copy of the data

Links to Other Websites

Our website may contain links to other websites that we do not operate. If you click on a third party link, you will be directed to that third party's site. We strongly advise You to review the Terms & Conditions of every Site You visit. We have no control over and assume no responsibility for the content, Terms & Conditions, or practices of any third-party sites or services.

Amendment to this Policy

If we decide to change our privacy policy, we will post those changes on this page and update the Privacy Policy modification date.

Third-Party Services

We may display or make available third-party content, including data, information, applications, and other services, or provide links to third-party websites or services. You acknowledge and agree that we shall not be responsible for any Third-party Services, including their accuracy, completeness, timeliness, validity, copyright compliance, legality, decency, quality, or any other aspect. We do not assume and shall not have any liability or responsibility to you or any other person or entity for any Third-Party Services.



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Tracking Technologies

- Google Maps APIs –this is a robust tool that can create a custom map, searchable map, check-in functions, display live data syncing with location or plan routes. Google map API may collect information from you and your device for security purposes which are per its Privacy policy
- Cookies – we use cookies to enhance the performance and functionality of our services. Without these cookies, you would be required to enter your login details every time you visit our sites, as we would not remember that you had logged in previously.
- Local storage –also known as DOM (Document Object Model storage) storage, provides web apps with methods and protocols for storing client-side data. Web storage supports persistent data storage, similar to cookies but with a greatly enhanced capacity and no information stored in the HTTP request header.
- Sessions –we use Sessions to identify the areas of our websites that you have visited. A session is a small piece of data stored on your computer or mobile device by your web browser.

Information about General Data Protection Regulation (GDPR)

We may be collecting and using information from you from the European Economic Area (EEA). We ensure your data and privacy is secured and comply with the GDPR guidelines.

Contact Us

Don't hesitate to contact us if you have any questions:

- via email: support@habari.co.tz
- via phone: +254 659 074 444