

EXMILE TECHNOLOGIES LIMITED

PRIVACY STATEMENT

PUBLISH DATE: JUNE 2026

1. PRIVACY STATEMENT

This Privacy Statement applies to EXMILE TECHNOLOGIES LIMITED ("we", "our" or "us"). We are committed to protecting your personal information and your right to privacy. This document explains how we collect, use, disclose, and safeguard your personal data in compliance with the Zambian Data Protection Act No. 3 of 2021 and other applicable laws and regulations of Zambia.

2. LAWFUL PROCESSING

The following principles guide the lawful processing of personal data as required under the Zambian Data Protection Act:

2.1 Accountability – We ensure personal data is processed lawfully, fairly, and transparently in relation to you.

2.2 Lawfulness and fairness – We will only collect, and process personal data based on lawful grounds permitted under Zambian law.

2.3 Purpose limitation – We process personal data for specific, explicit, and legitimate purposes only.

2.4 Data minimization – We only collect data that is relevant and limited to what is necessary.

2.5 Accuracy – We take reasonable steps to ensure your data is accurate and kept up to date.

2.6 Storage limitation – Personal data is kept only for as long as necessary for its intended purpose or as required by law.

2.7 Integrity and confidentiality – We apply appropriate security safeguards to protect your personal data against unauthorized access, alteration, disclosure, or destruction.

3. HOW DO WE COLLECT YOUR PERSONAL DATA?

We may collect your personal data in the following ways:

3.1 Directly from you, when you interact with us, for example through our website, email, or telephone.

3.2 Indirectly from third parties, such as affiliates, partners, or publicly available sources where lawful.

3.3 Automatically through technologies such as cookies when you use our website.

4. CATEGORIES OF PERSONAL DATA WE COLLECT

The categories of personal data we may collect include:

4.1 Personal details (name, address, email, phone number, date of birth).

4.2 Identification information (national ID, passport number).

4.3 Employment and professional data.

4.4 Financial and transactional data.

4.5 Marketing and communication preferences.

4.6 Technical and online identifiers such as IP addresses, device IDs, and cookies.

4.7 Any other personal data you voluntarily provide.

5. PURPOSES AND LEGAL BASES FOR PROCESSING

We process your personal data for the following purposes, based on lawful grounds provided under the Zambian Data Protection Act:

5.1 With your consent, for example when you subscribe to newsletters or marketing communications.

5.2 To perform a contract to which you are a party.

5.3 To comply with a legal or regulatory obligation.

5.4 To protect your vital interests.

5.5 For legitimate interests pursued by us or a third party, provided your rights and freedoms are not overridden.

6. SHARING AND DISCLOSURE OF PERSONAL DATA

We may share your personal data with the following parties, only where lawful and necessary:

6.1 Our group of companies and subsidiaries.

6.2 Professional advisers, auditors, consultants, and service providers.

6.3 Government authorities and regulators, including the Data Protection Commissioner.

6.4 Third-party partners assisting in providing our products and services.

6.5 Law enforcement agencies when required by law.

7. CROSS-BORDER TRANSFERS

Where personal data is transferred outside Zambia, we will ensure that such transfers comply with the Data Protection Act. Transfers will only occur to countries that provide an adequate level of protection, or where appropriate safeguards such as standard contractual clauses are in place and approved by the Data Protection Commissioner.

8. DATA RETENTION

We retain your personal data only for as long as necessary to fulfil the purposes for which it was collected or as required by law. Once the retention period expires, we securely delete or anonymize the data in accordance with our Data Retention and Destruction Policy.

9. DATA SECURITY

We implement appropriate technical and organizational measures to safeguard personal data against unauthorized access, alteration, disclosure, or destruction. Although we strive to protect your data, transmission over the internet can never be completely secure.

10. YOUR RIGHTS UNDER THE ZAMBIAN DATA PROTECTION ACT

As a data subject, you have the following rights under the Zambian Data Protection Act:

10.1 Right to access – to obtain confirmation and a copy of your personal data.

10.2 Right to rectification – to correct inaccurate or incomplete data.

10.3 Right to erasure – to request deletion of your data in certain circumstances.

10.4 Right to object – to object to processing on certain grounds.

10.5 Right to data portability – to receive your data in a structured, machine-readable format.

10.6 Right to restrict processing – to limit processing under certain conditions.

10.7 Right to withdraw consent – to withdraw consent at any time without affecting prior lawful processing.

10.8 Right to lodge a complaint – to file a complaint with the Data Protection Commissioner if you believe your rights have been infringed.

11. DATA BREACH NOTIFICATION

In the event of a personal data breach likely to result in a risk to your rights and freedoms, we will notify the Data Protection Commissioner and affected individuals without undue delay, in accordance with the Data Protection Act.

12. USE OF COOKIES

We use cookies and similar technologies to enhance your browsing experience and analyze website traffic. You may adjust your browser settings to refuse cookies, although this may affect certain functionalities. Please refer to our Cookie Policy for more details.

13. CHANGES TO THIS PRIVACY STATEMENT

We may update this Privacy Statement periodically. Any changes will be posted on our website with an updated revision date. We encourage you to review this statement regularly to stay informed about how we protect your data.

14. CONTACT DETAILS

For any questions, concerns, or requests relating to this Privacy Statement or the processing of your personal data, please contact us at:

info@exmile.co.zm | +260 77 026 9687