

Privacy Policy

POLICY #: FGL/P-PP/01-09

EFFECTIVE YEAR: 2009

PERTAINS TO: All Employees/website users

FAVORITE GROUP LIMITED is committed to providing quality services to you and this policy outlines our ongoing obligations to you in respect of how we collect, use and disclose your information when you use our website/service and tells you about your privacy rights and how the law protects you.

We have adopted the *Personal Data Protection Act No. 11 of 2023; Personal Data Protection (Personal Data Collection and Processing) Regulations, GN No. 449C of 2023 and Personal Data Protection (Complaints Settlement Procedures) Regulations, GN No. 449B of 2023*. The PDPA provide principles of protection of personal data so as to establish minimum requirements for the way in which we collect, use, disclose, store, secure and dispose of your Personal information by public and private bodies. A copy of the PDPA Principles may be obtained from the website of Parliament <https://www.parliament.go.tz/acts-list>

Interpretation and Definitions

Interpretation

The words of which the initial letter is capitalized have meanings defined under the following conditions. The following definitions shall have the same meaning regardless of whether they appear in singular or in plural.

Definitions

For the purposes of this Privacy Policy:

- **"Company"** (referred to as either "Favorite Group" Limited "the Company", "We", "Us" or "Our" in this Agreement) refers to [COMPANY INFORMATION]

For the purpose of the FGL, the Company is the Data Controller.

- **"Country"** refers to United Republic of Tanzania

- "PDPA" means **Personal Data Protection Act, No. 11 of 2023** and its respective Regulations
- "Client" means a natural person who is a resident of the United Republic of Tanzania.
- "Employee" means a natural person who is an employee of Favorite Group Limited
- "Cookies" are small files that are placed on your computer, mobile device or any other device by a website, containing the details of your browsing history on that website among its many uses.
- "Data Controller", for the purposes of the PDPA, refers to the Company as the legal person which alone or jointly with others collects and determines the purposes and means of the processing of Personal Data.
- "Device" means any device that can access the Service such as a computer, a cell phone or a digital tablet.
- "Personal Data/information" for purpose of PDPA is information of an identified person, which have been stored in any form, which includes personal information concerning race, national or ethnic origin, religion, age, or marital status, education, medical, criminal, employment history, any identification number, symbol or anything which identifies a person, address, finger prints or blood group, name and any such information which is confidential and a response to such information may reveal the content of a prior information and the views of any other person about the data.
- "Sensitive information" is defined in the Personal Data Protection Act No. 11 of 2023 to include information relating to Children, offences, financial transactions of an individual, security and biometric information, information that reveals race or ethnic origin, political outlook, religious or philosophical beliefs, trade-union membership, gender, health data or sexual relationships, and any personal information which by virtue of the laws of the country as presenting a major risk to the rights and interests of the data subject.
- "Service" refers to the Website.
- "Service Provider" means any natural or legal person who processes the data on behalf of the Company. It refers to third-party companies or individuals employed by the Company to facilitate the Service, to provide the Service on behalf of the Company, to perform services related to the Service or to assist the Company in analyzing how the Service is used. For the purpose of the PDPA, Service Providers are considered **Data Processors**.
- "Usage Data" refers to data collected automatically, either generated by the use of the Service or from the Service infrastructure itself (for example, the duration of a page visit).
- "Website" refers to [WEBSITE NAME: <https://favoritegroup.co.tz/>], accessible from [WEBSITE_URL]
- "You" means the individual accessing or using the Service, or the company, or other legal entity on behalf of which such individual is accessing or using the Service, as applicable.

Under the PDPA 'You' can be referred to as the **Data Subject** or as the User as you are the individual using the Service.

Collecting and Using Your Personal Data

This Personal Information is obtained in many ways including [**interviews, correspondence, by telephone and facsimile, by email, via our website <https://favoritegroup.co.tz/> from your website, from media and publications, from other publicly available sources, from cookies**] and from third parties. We don't guarantee website links or policy of authorised third parties.

Personal Data

We collect your Personal Information for the primary purpose of providing and improving our services to you, providing information to our clients and marketing. We may also use your Personal Information for secondary purposes closely related to the primary purpose, in circumstances where you would reasonably expect such use or disclosure. You may unsubscribe from our mailing/marketing lists at any time by contacting us in writing. By using the website/Service, You agree to the collection and use of information in accordance with this Privacy Policy.

While using Our Service, We may ask You to provide Us with certain personally identifiable information that can be used to contact or identify You. Personally identifiable information may include, but is not limited to:

- Email address
- First name and last name
- Phone number
- Address, State, Region/Province, ZIP/Postal code, City
- Usage Data

Usage Data

Usage Data is collected automatically when using the Service.

Usage Data may include information such as Your Device's Internet Protocol address (e.g. IP address), browser type, browser version, the pages of our Service that You visit, the time and date of Your visit, the time spent on those pages, unique device identifiers and other diagnostic data.

When You access the Service by or through a mobile device, We may collect certain information automatically, including, but not limited to, the type of mobile device You use, Your mobile device unique ID, the IP address of Your mobile device, Your mobile operating system, the type of mobile Internet browser You use, unique device identifiers and other diagnostic data.

We may also collect information that Your browser sends whenever You visit our Service or when You access the Service by or through a mobile device.

Use of Your Personal Data

When we collect Personal Information we will, where appropriate and where possible, explain to you why we are collecting the information and how we plan to use it. Generally the Company may use Personal Data for the following purposes:

- **To provide and maintain our Service**, including monitoring the usage of our Service.
- **To manage Your Account:** to manage Your registration as a user of the Service. The Personal Data You provide can give You access to different functionalities of the Service that are available to You as a registered user.
- **For the performance of a contract:** the development, compliance and undertaking of the purchase contract for the products, items or services You have purchased or of any other contract with Us through the Service.
- **To contact You:** To contact You by email, telephone calls, SMS, or other equivalent forms of electronic communication, such as a mobile application's push notifications regarding updates or informative communications related to the functionalities, products or contracted services, including the security updates, when necessary or reasonable for their implementation.
- **To provide You with news**, special offers and general information about other goods, services and events which we offer that are similar to those that you have already purchased or enquired about unless You have opted not to receive such information.
- **To manage Your requests:** To attend and manage Your requests to Us.
- **For business transfers:** We may use Your information to evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of Our assets, whether as a going concern or as part of bankruptcy,

liquidation, or similar proceeding, in which Personal Data held by Us about our Service users is among the assets transferred.

- **For other purposes:** We may use Your information for other purposes, such as data analysis, identifying usage trends, determining the effectiveness of our promotional campaigns and to evaluate and improve our Service, products, services, marketing and your experience.

Third Parties

Third party entails any natural or legal person, or public body other than the data subject, data controller or data processor and any person who is authorised to process personal data. Where reasonable and practicable to do so, we will collect your Personal Information only from you. However, in some circumstances we may be provided with information by third parties. In such a case we will take reasonable steps to ensure that you are made aware of the information provided to us by the third party.

Disclosure of Personal Information

Your Personal Information may be disclosed in a number of circumstances including the following:

- Third parties where you consent to the use or disclosure;
- Information is used directly to the purpose for which it was collected;
- Used in the form that data subject is not identified; and
- Where required or authorised by law.

In any case, the Company will gladly help to clarify the specific legal basis that applies to the processing, and in particular whether the provision of Personal Data is a statutory or contractual requirement, or a requirement necessary to enter into a contract.

We may share Your personal information in the following situations:

- **With Service Providers:** We may share Your personal information with Service Providers to monitor and analyze the use of our Service, for payment processing, to contact You.
- **For business transfers:** We may share or transfer Your personal information in connection with, or during negotiations of, any merger, sale of Company assets, financing, or acquisition of all or a portion of Our business to another company.

- **With Affiliates:** We may share Your information with Our affiliates, in which case we will require those affiliates to honor this Privacy Policy. Affiliates include Our parent company and any other subsidiaries, joint venture partners or other companies that We control or that are under common control with Us.
- **With business partners:** We may share Your information with Our business partners to offer You certain products, services or promotions.
- **With other users:** when You share personal information or otherwise interact in the public areas with other users, such information may be viewed by all users and may be publicly distributed outside.
- **With Your consent:** We may disclose Your personal information for any other purpose with Your consent.

Detailed Information on the Processing of Your Personal Data

The Service Providers We use may have access to Your Personal Data. These third-party vendors collect, store, use, process and transfer information about Your activity on Our Service in accordance with their Privacy Policies.

Tracking Technologies and Cookies

We use Cookies and similar tracking technologies to track the activity on Our Service and store certain information. Tracking technologies used are beacons, tags, and scripts to collect and track information and to improve and analyze Our Service. The technologies We use may include:

- **Cookies or Browser Cookies.** A cookie is a small file placed on Your Device. You can instruct Your browser to refuse all Cookies or to indicate when a Cookie is being sent. However, if You do not accept Cookies, you may not be able to use some parts of our Service. Unless you have adjusted Your browser setting so that it will refuse Cookies, our Service may use Cookies.
- **Web Beacons.** Certain sections of our Service and our emails may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit the Company, for example, to count users who have visited those pages or opened an email and for other related website statistics (for example, recording the popularity of a certain section and verifying system and server integrity).

Cookies can be "Persistent" or "Session" Cookies. Persistent Cookies remain on Your personal computer or mobile device when You go offline, while Session Cookies are deleted as soon as You close Your web browser.

We use both Session and Persistent Cookies for the purposes set out below:

- **Necessary / Essential Cookies**

Type: Session Cookies

Administered by: Us

- Purpose: These Cookies are essential to provide You with services available through the Website and to enable You to use some of its features. They help to authenticate users and prevent fraudulent use of user accounts. Without these Cookies, the services that You have asked for cannot be provided, and We only use these Cookies to provide You with those services.

- **Cookies Policy / Notice Acceptance Cookies**

Type: Persistent Cookies

Administered by: Us

- Purpose: These Cookies identify if users have accepted the use of cookies on the Website.

- **Functionality Cookies**

Type: Persistent Cookies

Administered by: Us

- Purpose: These Cookies allow us to remember choices You make when You use the Website, such as remembering your login details or language preference. The purpose of these Cookies is to provide You with a more personal experience and to avoid You having to re-enter your preferences every time You use the Website.

- **Tracking and Performance Cookies**

Type: Persistent Cookies

Administered by: Third-Parties

- Purpose: These Cookies are used to track information about traffic to the Website and how users use the Website. The information gathered via these Cookies may directly or indirectly identify you as an individual visitor. This is because the information collected is typically linked to a pseudonymous identifier associated with the device you use to

access the Website. We may also use these Cookies to test new pages, features or new functionality of the Website to see how our users react to them.

Sensitive information will be used by us only:

- For the primary purpose for which it was obtained
- For a secondary purpose that is directly related to the primary purpose
- With your consent; or where required or authorised by law.

Security of Personal Information

The security of Your Personal Data is important to Us, but remember that no method of transmission over the Internet, or method of electronic storage is 100% secure. While we strive to use commercially acceptable means to protect Your Personal Data, we cannot guarantee its absolute security. However, your Personal Information is stored in a manner that reasonably protects it from misuse and loss and from unauthorized access, modification or disclosure.

Retention and Disposal of Personal Data

When your Personal Information is no longer needed for the purpose for which it was obtained, we will take reasonable steps to destroy or permanently de-identify your Personal Information.

The Company will retain Your Personal Data only for as long as is necessary for the purposes set out in this Privacy Policy. We will retain and use Your Personal Data to the extent necessary to comply with our legal obligations (for example, if we are required to retain your data to comply with applicable laws), resolve disputes, and enforce our legal agreements and policies. However, most of the Personal Information is or will be stored in client files which will be kept by us for a minimum of 7 years.

Access and Rectification of your Personal Information

You may access the Personal Information we hold about you and to update and/or correct it, subject to certain exceptions. If you wish to access your Personal Information, please contact us in writing and we may allow the rectification of personal data within 14days after receiving your request.

Favorite Group Limited will not charge any fee for your access request, but may charge an administrative fee for providing a copy of your Personal Information.

In order to protect your Personal Information we may require identification from you before releasing the requested information.

Maintaining the Quality of your Personal Information

It is an important to us that your Personal Information is up to date. We will take reasonable steps to make sure that your Personal Information is accurate, complete and up-to-date. If you find that the information we have is not up to date or is inaccurate, please advise us as soon as practicable so we can update our records and ensure we can continue to provide quality services to you.

Your Rights under the PDPA Regulations

The law imposes on one hand, obligation to Data Controller or processor while processing the information of the Data subject, and on the other hand being rights of the data subject;

- granting the data subject autonomous right to freedom to control his personal data;
- enable the data subject to communicate and exercise his rights;
- to eliminate any discrimination against the data subject;
- guarding against the exploitation of the needs or vulnerabilities of data subject; and
- incorporating human intervention to minimise biases that automated decision-making processes may create.

Law enforcement

Under certain circumstances, the Company may be required to disclose Your Personal Data if required to do so by law or in response to valid requests by public authorities (e.g. a court or a government agency).

Policy Updates

This Policy may change from time to time and is available on our website.

Privacy Policy Complaints and Enquiries

The Personal Data Protection (Complaints Settlement Procedures) Regulations, GN No. 449B of 2023 provides step by step procedures for determination of the complaint. If you have any queries or complaints about our Privacy Policy please contact us at:

Address: Alfa Plaza, 6th Floor, Ada Estate, Off Ali Hassan Mwinyi Rd, Dar es

Salaam

Email address: info@favoritegroup.co.tz

Phone number(s): [\[+255 683 383 132\]](tel:+255683383132)