ZIMBABWE CYBER AND DATA PROTECTION ACT

Privacy, Data Protection & Cybersecurity Policy

Prepared for In Coatings Investments | Harare, Zimbabwe

Primary law	Cyber and Data Protection Act [Chapter 12:07] (Act No. 5 of 2021)
Regulations	S.I. 155 of 2024 - Licensing of Data Controllers and Appointment of Data Protection Officers
Regulator	Postal and Telecommunications Regulatory Authority of Zimbabwe (POTRAZ), designated Data Protection Authority
Effective date	15 September 2026

Compliance note. This policy is designed to align In Coatings Investments' public-facing privacy practices with Zimbabwe's current data protection framework. Legal compliance also depends on actual operational practices, licensing status, Data Protection Officer obligations, contracts, records, security controls and incident handling. These should be reviewed periodically and, where appropriate, confirmed by Zimbabwean legal counsel or POTRAZ.

1. Purpose and legal framework

In Coatings Investments is committed to protecting personal information, maintaining the confidentiality, integrity and availability of information systems, and using information and communication technologies lawfully and securely. This policy explains how personal information is collected, used, stored, disclosed, protected and deleted, and how data subjects may exercise their rights.

This policy is structured with reference to the Constitution of Zimbabwe, the Cyber and Data Protection Act [Chapter 12:07] (the “Act”), the Cyber and Data Protection (Licensing of Data Controllers and Appointment of Data Protection Officers) Regulations, 2024 (S.I. 155 of 2024), and applicable implementation guidelines issued by the Data Protection Authority.

Key references: Constitution of Zimbabwe, section 57 (privacy); Act sections 2, 5-6, 7-29; S.I. 155 of 2024 sections 3-17.

2. Scope

This policy applies to personal information processed by In Coatings Investments through its website, enquiries, quotations, project administration, customer and supplier interactions, electronic communications and related business activities. It applies to data handled electronically or in structured records and to service providers processing data on behalf of the company.

- Website visitors, prospective customers and customers.
- Supplier, contractor and business contact information.
- Employees or applicants where data is processed through company systems, subject to any separate internal policies.
- Personal information processed in Zimbabwe and, where the Act applies, relevant cross-border processing.

3. Data protection principles

In Coatings Investments applies the principles required by the Act, including:

- Necessity, lawfulness, fairness and transparency in processing.
- Collection for specified, explicit and legitimate purposes, without incompatible further processing.
- Data minimisation: collecting only data that is adequate, relevant and necessary for the stated purpose.
- Accuracy: taking reasonable steps to keep personal information current and to correct or erase inaccurate information without undue delay.
- Retention limitation: keeping identifiable personal information only for as long as necessary for the purpose, legal duties or legitimate records management.
- Accountability: maintaining measures and internal mechanisms capable of demonstrating compliance to data subjects and the Authority.

References: Act sections 7-9, 13 and 24.

4. Personal information we may collect

- Identity and contact information: name, company, email address, telephone/WhatsApp number and contact preferences.
- Enquiry and project information: property or project location, requested services, dimensions, photographs, specifications and quotation details voluntarily supplied by the user.
- Business transaction records: correspondence, quotations, invoices, payment or supplier records where applicable.
- Technical information: IP address, browser/device information, logs and security information generated when the website or systems are used.
- Cookie or analytics information where such tools are enabled and lawful notices/choices are provided.
- Sensitive personal information only where genuinely necessary and processed in accordance with the stricter requirements of the Act.

5. Lawful processing and consent

For non-sensitive personal information, In Coatings Investments will obtain consent where required. The Act also permits processing without consent in defined circumstances, including compliance with law, protection of vital interests, public-

interest functions and legitimate interests that are not overridden by the data subject's fundamental rights and freedoms. The company will identify and document the appropriate basis before processing.

Sensitive information will not be processed unless the conditions in the Act are satisfied, including written consent where required. Consent may be withdrawn where the law permits, without charge, but withdrawal does not invalidate processing that was lawful before withdrawal.

References: Act sections 10-12; POTRAZ Implementation Guideline on the Right to Consent.

6. How information is used

- Responding to enquiries and preparing quotations or estimates.
- Providing painting, coating, waterproofing, construction or related services requested by a customer.
- Communicating about projects, appointments, deliveries, service updates and customer support.
- Maintaining business, accounting, contractual and regulatory records.
- Protecting the website, systems, users, staff and business from fraud, abuse, cyber threats and unauthorised access.
- Complying with applicable law, lawful requests and obligations imposed by competent authorities.
- Marketing only where permitted and subject to a data subject's right to object or withdraw consent where applicable.

7. Notice and transparency obligations

When collecting personal information directly, In Coatings Investments will provide appropriate information about the identity/contact details of the controller, the purposes of processing, whether information is required, relevant recipients or categories of recipients, and the rights of the data subject. Where personal information is obtained indirectly, the company will provide the disclosures required by the Act unless a lawful exception applies.

References: Act sections 14-16 and 23.

8. Data subject rights

Subject to the Act and any lawful limitations, a data subject may request to:

- Be informed about the use of his or her personal information.
- Access personal information held by the company or its processor.
- Object to processing of all or part of personal information.
- Correct false, misleading or inaccurate personal information.
- Request deletion of false or misleading data and, where otherwise applicable, request lawful erasure or cessation of processing.
- Object to direct marketing and withdraw consent for future optional processing.
- Not be subject to a decision based solely on automated processing that produces legal or similarly significant effects, unless a lawful exception applies.

The company may take reasonable steps to verify identity before responding to a rights request and will keep appropriate records of the request and response.

References: Act sections 14, 15, 16 and 25.

9. Children and persons unable to exercise rights personally

A child is a person under 18 for purposes of the Act. Where the data subject is a child, his or her rights are exercised by a parent or legal guardian. In Coatings Investments does not intentionally design its public website to collect children's personal information. If such information is necessary for a legitimate business purpose, appropriate guardian consent and heightened safeguards will be applied. Rights of physically, mentally or legally incapacitated data subjects will be handled through the lawful representative provided for by the Act.

References: Act sections 26-27; POTRAZ Implementation Guideline on Processing Children's Personal Information.

10. Sharing, processors and service providers

Personal information may be shared only to the extent reasonably necessary with authorised employees, contractors, hosting/IT providers, professional advisers, payment/accounting providers, delivery or project partners, or authorities where legally required. Access is limited to the relevant purpose.

Where a third party processes personal data on behalf of In Coatings Investments, the company will use an appropriate written processing agreement or legal instrument requiring the processor to maintain necessary security measures and process data only on authorised instructions, as required by the Act and S.I. 155 of 2024.

References: Act sections 17-18; S.I. 155 of 2024 section 10(4)(f).

11. Cross-border transfers

In Coatings Investments will not transfer personal information outside Zimbabwe unless the requirements of the Act and applicable POTRAZ guidance are satisfied. The company will consider the adequacy of protection in the receiving country or organisation, the nature and purpose of processing, security measures and applicable professional/legal rules. Where a destination does not provide an adequate level of protection, a transfer will occur only where a permitted exception or other authorised safeguard applies, such as unambiguous consent or another condition recognised by section 29 of the Act.

Where S.I. 155 of 2024 requires notification of an intention to transfer or share data outside Zimbabwe, the company will make the required notification to the Authority.

References: Act sections 28-29; S.I. 155 of 2024 section 10(2)(c); POTRAZ Cross-Border Transfer Implementation Guideline.

12. Cybersecurity and information-security controls

The Act requires appropriate technical and organisational measures to protect data from negligent or unauthorised destruction, loss, alteration, access or other unauthorised processing. S.I. 155 of 2024 further requires risk assessments, organisational policies, physical and technical controls across data phases, and measures supporting security, confidentiality, integrity, availability and timely restoration after incidents.

- Risk assessment proportionate to the sensitivity, volume, context and potential harm associated with processing.
- Role-based access control, least-privilege access and periodic review of user access.
- Strong authentication controls, including multi-factor authentication where appropriate and technically feasible.
- Secure password practices and controlled privileged/administrator accounts.
- Encryption or equivalent protective controls for sensitive information in transit and at rest where appropriate to the risk.
- Secure configuration, timely security updates and patch management for supported systems and applications.
- Malware protection, email/web threat controls and reasonable protection against phishing and malicious content.
- Logging, monitoring and investigation of suspicious or unauthorised activity where proportionate.
- Regular, protected backups and restoration testing sufficient to restore availability in a timely manner following a technical or physical incident.
- Network, hosting and endpoint safeguards appropriate to the systems used by the company.
- Physical security for devices, records and locations containing personal information.
- Secure retention and disposal, including deletion or destruction of information and media when no longer required.
- Supplier and processor due diligence, contractual security requirements and review of external access.
- Staff awareness, confidentiality obligations and periodic training relevant to privacy, cyber security, phishing and incident reporting.
- An incident-response process providing detection, containment, preservation of evidence, assessment, escalation, recovery and lessons learned.

References: Act section 18; S.I. 155 of 2024 sections 10(4), 11 and 16.

13. Personal data breach response and notification

A personal data or security breach will be treated as an incident requiring prompt assessment and escalation. In Coatings Investments will maintain procedures to detect, investigate, document, contain and remediate breaches.

- Notify POTRAZ/Data Protection Authority within 24 hours of a security breach affecting personal data processed by the company, as required by section 19 of the Act.

- Use the applicable breach-notification process/form required by S.I. 155 of 2024 and provide available facts while continuing the investigation.
- Where a detected breach is likely to result in a high risk of adversely affecting individuals' rights and freedoms, inform affected data subjects within 72 hours in accordance with the 2024 Regulations.
- Keep a record of personal data breaches, including facts, effects, response steps and remedial action.
- Cooperate with the Authority, respond to information requests on breaches within the applicable regulatory period, and conclude/submit investigation reporting within the time required by S.I. 155 of 2024.

References: Act sections 19-21; S.I. 155 of 2024 section 17 and Form DP3; POTRAZ Data Breach Notification and Handling Implementation Guideline.

14. Data retention and secure disposal

Personal information will be kept only for as long as necessary for the purpose for which it was collected, for legitimate business records, or for applicable contractual, tax, accounting, evidentiary or legal requirements. When retention is no longer justified, information will be securely deleted, anonymised or destroyed in a manner appropriate to the medium and risk.

References: Act sections 7 and 13.

15. Licensing, registration and Data Protection Officer obligations

S.I. 155 of 2024 establishes licensing and registration duties for persons who determine the means, purpose or outcome of personal-data processing or otherwise fall within the Regulations. It also requires a data controller to appoint a Data Protection Officer and notify the Authority in the prescribed manner, subject to applicable legal requirements and exemptions.

In Coatings Investments will assess and maintain its licensing/registration position, DPO appointment and regulatory notifications as required by law. Publication of this policy does not by itself constitute evidence that a licence or DPO registration has been issued; those are separate regulatory obligations and records.

References: S.I. 155 of 2024 sections 3-12; POTRAZ Implementation Guidelines on Licensing of Data Controllers and on Appointment/Roles of Data Protection Officers.

16. Complaints and regulatory authority

Privacy or data-protection queries may first be raised with In Coatings Investments. A data subject may also make a complaint to the Data Protection Authority in accordance with the Act and applicable POTRAZ procedures.

Company	In Coatings Investments
Location	Harare, Zimbabwe
Email	violet@incoatingsinvestments.co.zw / fytone@incoatingsinvestments.co.zw
Regulator	Postal and Telecommunications Regulatory Authority of Zimbabwe (POTRAZ) - Data Protection Authority

17. Cookies and website technologies

Where cookies, analytics or similar technologies are used, In Coatings Investments will limit their use to legitimate website functionality, security or properly disclosed analytics/marketing purposes. Where consent is required, the company will seek it before activating optional technologies and will respect applicable choices or withdrawals.

18. Direct marketing

If personal information is used for direct marketing, the data subject will be informed of the right to object, free of charge, and the company will honour valid objections and withdrawals for future marketing. Marketing records may be retained to the extent necessary to respect a suppression or opt-out request.

References: Act sections 15-16; POTRAZ consent guidance.

19. Governance, review and updates

This policy will be reviewed periodically and when material changes occur in the company's processing activities, systems, service providers or Zimbabwean law/regulatory guidance. Updates will be published on the In Coatings Investments In Coatings Investments website with a revised effective date. Internal procedures, incident response, processor agreements, risk assessments, training, licensing and DPO records should be maintained separately as operational compliance evidence.

20. Legal and regulatory references

- Constitution of Zimbabwe Amendment (No. 20) Act, 2013 - section 57 (right to privacy).
- Cyber and Data Protection Act [Chapter 12:07], Act No. 5 of 2021, as gazetted with correct title/chapter number on 11 March 2022.
- Cyber and Data Protection (Licensing of Data Controllers and Appointment of Data Protection Officers) Regulations, 2024 - Statutory Instrument 155 of 2024, gazetted 13 September 2024.
- POTRAZ/Data Protection Authority Implementation Guidelines, including guidance on licensing of data controllers, appointment and functions of Data Protection Officers, consent, processing children's personal information, cross-border transfers, and data breach notification and handling.
- Official regulator: Postal and Telecommunications Regulatory Authority of Zimbabwe (POTRAZ), acting as the Data Protection Authority under section 5 of the Act.

Important: This public policy is a compliance document and privacy notice; it does not replace the company's obligation to implement the stated controls in practice or to obtain any licence, registration, DPO appointment/certification, approval or notification required by Zimbabwean law.