



Privacy policy

Vodafone m-pesa Limited (hereinafter referred to as 'Vodafone India') is committed to protecting our customers' personal information. We have created this Privacy Policy to help you understand how we collect, use and protect your information when you visit our web and WAP sites and use our products and services.

Our privacy policy explains how we collect, use, share and protect your personal information.

This policy is provided for your information and is not intended to limit or exclude your rights under laws and regulations applicable in India.

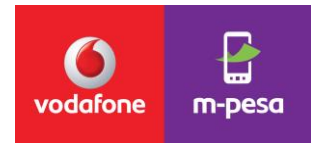
1. What personal information does Vodafone India collect?

We may hold information relating to you that you have provided to us (such as on an application or registration form) or that we may have obtained from another source (such as our suppliers or from marketing organisations and credit agencies).

This information may include, amongst other things, your name, address, telephone numbers, information on how you use our products and services (such as the type, date, time, location and duration of calls or messages, the numbers you call and how much you spend, and information on your browsing activity when visiting one of our group companies' websites), the location of your mobile phone from time to time, lifestyle information, details of your m-pesa transactions and any other information collected in relation to your use of our products and services ("information").

The information we collect about you depends on the Vodafone products and services you use and subscribe to. It includes (but isn't limited to) the following:

- Your name, address, phone number, date of birth and email address.
- Credit or debit card information, information about your bank account number, details of your m-pesa transactions and sort code or other banking information.
- Your preferences for particular products, services or lifestyle activities when you tell us what they are – or when we assume what they are, depending on how you use our products and services.
- Your contact with us – such as a note or recording of a call you make to one of our contact centres, an email or letter you send to us or other records of any contact you have with us.
- Your account information – such as dates of payment owed and received, TopUp information, the subscription services you use or any other information related to your account.



2. How does Vodafone India use your Personal Information?

The information that we collect from you is held in accordance with applicable laws and regulations in India. It may be used by us for a number of purposes connected with our business operations and functions, which include:

2.1 processing your orders or applications;

2.2 carrying out credit checking and scoring (unless we have agreed otherwise);

2.3 providing you with products and/or services requested (including the presentation or elimination of calling or connected line identification) or administering your account;

2.4 billing you (unless you pay by another agreed method);

2.5 settling accounts with those who provide related services to us;

2.6 dealing with requests, enquiries or complaints and other customer care related activities; and all other general administrative and business purposes;

2.7 carrying out market and product analysis and marketing our and our group companies' products and services generally and design financial services or related products for customers' use;

2.8 contacting you (including by post, email, fax, short text message (SMS), pager or telephone) about our and our group companies' products and services and the products and services of carefully selected third parties which we think may be of interest to you (unless you ask us in writing not to). For completeness we note that where such contact is via electronic means, our terms and conditions record our agreement with you that the electronic marketing messages we and our selected third parties send need not include an unsubscribe facility;

2.9 registering your details and allocating or offering you rewards, discounts or other benefits and fulfilling any requests or requirements you may have in respect of our and our group companies' loyalty or reward programmes and other similar schemes;

2.10 inclusion in any telephone or similar directory or directory enquiry service provided or operated by us or by a third party (subject to any objection or preference you may have indicated to us in writing);

2.11 carrying out any activity in connection with a legal, governmental or regulatory requirement on us or in connection with legal proceedings, crime or fraud prevention, detection or prosecution;



2.12 carrying out activities connected with the running of our business such as personnel training, quality control, network monitoring, testing and maintenance of computer and other systems and in connection with the transfer of any part of our business in respect of which you are a customer or a potential customer.

3. Sharing your Personal Information

There may be times when we need to disclose your personal information to third parties. If we do this, we will only disclose your information to:

3.1 our group companies who may in India use and disclose your information for the same purposes as us;

3.2 those who provide to us or our group companies products or services that support the services that we provide, such as our dealers and suppliers, merchants, bank;

3.3 credit reference agencies (unless we have agreed otherwise) who may share your information with other organisations and who may keep a record of the searches we make against your name;

3.4 if someone else pays your bill, such as your employer, that person;

3.5 those providing telephone and similar directories or directory enquiry services

3.6 anyone we transfer our business to in respect of which you are a customer or a potential customer;

3.7 anyone who assists us in protecting the operation of the Vodafone India networks and systems, including the use of monitoring and detection in order to identify potential threats, such as hacking and virus dissemination and other security vulnerabilities;

3.8 persons to whom we may be required to pass your information by reason of legal, governmental or regulatory authority including law enforcement agencies and emergency services;

3.9 any person or organisation as authorised by laws and regulations applicable in India.

3.10 Companies who are engaged to perform services for, on behalf of Vodafone India, or the Vodafone group of companies;

3.11 Credit reference, fraud prevention or business scoring agencies, or other credit scoring agencies;

3.12 Debt collection agencies or other debt recovery organisations;



3.13 Law enforcement agencies, regulatory organisations, courts or other public authorities if we have to, or are authorised to by law.

If you have opted in to receiving marketing communications from us, we may also provide your personal information to carefully selected third parties who we reasonably believe provide products or services that may be of interest to you and who have contracted with Vodafone India to keep the information confidential, or who are subject to obligations to protect your personal information.

If you would like to opt-out of receiving Vodafone marketing communications, please sms START DND to 1909 (toll free) Please note that Vodafone India will still need to send you essential information about your account or changes to your service.

4. Sharing your information outside India

If you wish to use our products or services abroad, your information may be transferred outside India to that country. Our websites and those of our group companies may also be based on servers located outside of India. However, you may please note that m-pesa is a product governed under Reserve Bank of India regulations and cannot be used outside India.

5. Keeping your personal information secure

5.1 We have specialised security teams who constantly review and improve our measures to protect your personal information from unauthorised access, accidental loss, disclosure or destruction.

5.2 If we have a contract with another organisation to provide us with services or a service on our behalf to process your personal information, we'll make sure they have appropriate security measures and only process your information in the way we've authorised them to. These organisations won't be entitled to use your personal information for their own purposes. If necessary, our security teams will check them to make sure they meet the security requirements we've set.

5.3 Communications over the internet (such as emails) aren't secure unless they've been encrypted. Your communications may go through a number of countries before being delivered, as this is the nature of the internet. We can't accept responsibility for any unauthorised access or loss of personal information that's beyond our control.

5.4 Both you and Vodafone India play an important role in protecting against online fraud. You should be careful that your m-pesa account details including your User ID(s) and/or Passwords/personal identification numbers (PIN) are not compromised by ensuring that you do not knowingly or accidentally share, provide or facilitate unauthorised use of it. Please do not share your User ID and/or password or allow access or use of it by others. We endeavor to put in place high standards of security to protect your interests.



5.5 You should safeguard your unique User ID(s) and Passwords/PINs by keeping it secret and confidential. Kindly never write them down or share these details with anyone. Vodafone India will never ask you for your Passwords/PINs, in order to ensure that you are the only person who knows this information. When choosing your unique User ID and Password for the first time, do not create it using easily identifiable information such as your birthday, telephone number or a recognisable part of your name. If you think your User ID and/or Passwords/PINs have been disclosed to third party is lost or stolen and unauthorised transactions may have been conducted, you are responsible to inform us immediately.

We will take reasonable steps to ensure that the personal information we collect, use or disclose is accurate, complete, up-to-date and stored in a secure environment protected from unauthorised access, modification or disclosure. In case of any concerns the privacy officer can be contacted at privacyofficer@vodafone.com.

6. Internet use

We make every effort to maintain the security of our internet connections; however for reasons outside of our control, security risks may still arise. Any personal information transmitted to us or from our online products or services will therefore be your own risk, however we will use our best efforts to ensure that any such information remains secure. We cannot protect any information that you make available to the general public – for example, on message boards or in chat rooms.

Please note that when you are accessing a non-Vodafone website, you should always read their privacy policy or website terms and conditions – especially if you are considering providing them with your personal information. You are also responsible for maintaining the secrecy of your passwords and/or any account information.

We may use cookies and other interactive techniques such as web beacons to collect non-personal information about how you interact with our website, and web-related products and services, to:

6.1 understand what you like and use about our website;

6.2 understand what you do not like and do not use on our website;

6.3 provide a more enjoyable, customised service and experience, and

6.4 help us develop and deliver better products and services tailored to our customers' interests and needs.

We may use a persistent cookie to record details such as a unique user identity and general registration details on your PC. This helps us recognise you on subsequent visits to this website



so that you don't have to re-enter your registration details each time you visit us and allows us to carry out the activities mentioned above.

Most browser technology (such as Internet Explorer, Netscape etc) allows you to choose whether to accept cookies or not – you can either refuse all cookies or you can set your browser to alert you each time that a website tries to set a cookie.

8. Changes to our Privacy Policy

We may change this Privacy Policy from time to time.

IMPORTANT: By accessing this web site and any of its pages you are agreeing to the terms set out above.