

# Privacy Policy

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## 1.OVERVIEW

This website (“**Site**”) and the Mzaalo Services (as defined under the [Terms of Use](#)) are managed by Xfinite Global PLC. (“**Mzaalo**”). This privacy policy will only be applicable, and the obligations of Mzaalo will only extend to, information expressly collected by Mzaalo from you, through this Site or the Mzaalo Services shall not apply to any information collected or otherwise made available to Mzaalo or any of its affiliates or licensors. This policy does not apply to the practices

The Site and the Mzaalo Services may contain links to websites, forums or other content operated or maintained by third parties. Mzaalo is not responsible for the privacy practices or policies of such third party web sites and this privacy policy does not apply to those websites or to any information collected otherwise by any third party.

You may further make information publicly available while interacting with various user modifiable sections of this Site including comments, reviews, profile information or feedbacks. Mzaalo is not responsible for any such information and any use of such information by any party.

## 2.COMMITMENT TO PRIVACY

### 2.1.

Mzaalo takes your privacy seriously. To help you better protect your privacy, and help you evaluate the protection your information enjoys on our website, we provide this statement explaining our online information policies and practices to assist you in the choices you can make about the way your information is collected and used. Please do read this policy, the Legal Disclaimer and the [1](#) carefully before contributing any information to this website.

## 3.DEFINITIONS USED IN THIS POLICY

Personal Data – any information relating to an identified or identifiable natural person. Processing – any operation or set of operations which is performed on Personal Data or on sets of Personal Data. Data subject – a natural person whose Personal Data is being processed. Child – a natural person under 18 years of age.

## 4. DATA PROTECTION PRINCIPLES

We promise to follow the following data protection principles:

- Processing is lawful, fair, and transparent. Our processing activities have lawful grounds. We always consider your rights before processing Personal Data. We will provide you information regarding processing upon request.
- Processing is limited to the purpose. Our processing activities fit the purpose for which Personal Data was gathered.
- Processing is done with minimal data. We only gather and process the minimal amount of Personal Data required for any purpose.
- Processing is limited with a time period. We will not store your personal data for longer than needed.
- We will do our best to ensure the accuracy of data.
- We will do our best to ensure the integrity and confidentiality of data.

## 5. DATA SUBJECT'S RIGHTS

The Data Subject has the following rights:

- Right to information – meaning you have the right to know whether your Personal Data is being processed; what data is gathered, from where it is obtained and why and by whom it is processed.
- Right to access – meaning you have the right to access the data collected from/about you. This includes your right to request and obtain a copy of your Personal Data gathered.
- Right to rectification – meaning you have the right to request rectification or erasure of your Personal Data that is inaccurate or incomplete.
- Right to erasure – meaning in certain circumstances you can request for your Personal Data to be erased from our records.
- Right to restrict processing – meaning where certain conditions apply, you have the right to restrict the Processing of your Personal Data.
- Right to object to processing – meaning in certain cases you have the right to object to Processing of your Personal Data, for example in the case of direct marketing.
- Right to object to automated Processing – meaning you have the right to object to automated Processing, including profiling; and not to be subject to a decision based solely on automated Processing. This right you can exercise whenever there is an outcome of the profiling that produces legal effects concerning or significantly affecting you.
- Right to data portability – you have the right to obtain your Personal Data in a machine-readable format or if it is feasible, as a direct transfer from one Processor to another.
- Right to lodge a complaint – in the event that we refuse your request under the Rights of Access, we will provide you with a reason as to why. If you are not satisfied with the way your request has been handled please contact us.
- Right for the help of supervisory authority – meaning you have the right for the help of a supervisory authority and the right for other legal remedies such as claiming damages.
- Right to withdraw consent – you have the right to withdraw any given consent for Processing of your Personal Data.

## 6. WHAT DATA WE GATHER ABOUT YOU AND ITS USE

### USER PROVIDED INFORMATION:

- We may require you to provide certain personal data as registration information (“Registration Information”) for the use of several features of the Mzaalo Services and for access to several of our Content (as defined under the Terms of Use, when you visit certain Mzaalo pages or the pages of certain Mzaalo partners and when you

enter promotions offered by Mzaalo or certain of its partners. All such Registration Information is collected voluntarily, and no other information is collected other than those specifically provided by you. This is to enable us to verify whether you are entitled to access and use certain Content, information, materials and services available through our website and the Mzaalo Services, or to enable us to enhance your site visit, to assist you with customer service or technical support issues, or to otherwise support your customer relationship with us. It is completely optional for you to participate, submit any Registration Information, or avail of these features.

- Where we collect such Registration Information, we do so with the objective of providing our services to you and for improving our website and the services we offer. This information may assist us in providing you with more effective customer service, making this Site or services easier to use by eliminating the need for you to repeatedly enter the same information, performing research and analysis aimed at improving our products, services and technologies, and displaying content and advertising that are customized to your interests and preferences. Mzaalo also uses the Registration Information to customize the advertising and Content you see, fulfil your requests for products and services, improve our services, contact you, conduct research, and provide anonymous reporting for internal and external clients.
- Mzaalo may combine information about you that we have with the information we obtain from data aggregators, public databases, business partners or other companies, which may include your interests, purchasing behavior and your activities online, such as websites visited and advertisements viewed.
- We reserve the right to conduct research and perform statistical analyses on Registration Information in order to measure interest in and use of the various areas of the site and to inform advertisers of such information. We will release only aggregate data and all personal data obtained from these analyses will be kept confidential from concerned third parties and at no time shall personal data be disclosed.
- We also use your Registration Information to communicate with you. We may send certain service communications such as welcome letters, billing reminders, information on technical service issues, and security announcements. If you do not wish to receive such communications, please email us at [support@xfinite.io](mailto:support@xfinite.io) to stop such communications. Please allow at least 72 hours for the actual cancellation to take effect. We shall not divulge your email address to third parties without your prior consent.
- If while using the Mzaalo Services, you post information online that is accessible to the public including in any comment sections of our Site, Mzaalo shall not be responsible for any such information and any use of such information by any party including any unsolicited communications from any third party.
- For members in certain countries, you can connect your Mzaalo account to Facebook. If you choose to connect, you'll be able to take advantage of various social features we will be creating as part of the Mzaalo service, as well as features available on Facebook. In addition, Mzaalo may personalize and otherwise seek to enhance your experience based on your information from your Facebook account. By connecting your Mzaalo account to your Facebook account, you acknowledge and agree that you are consenting to the continuous release of information about you to others, including to Facebook (in accordance with your privacy settings on Facebook and your account settings on Mzaalo). If you do not want information about you, including information such as your viewing activity, to be shared in this manner, do not use the Facebook connect feature. Mzaalo disclaims all warranties in relation to and all liabilities arising from any use of your personal information by Facebook or any other third party.

**LOCAL STORAGE:**

- Mzaalo automatically receives and records information from your computer and browser, including your IP address, software and hardware attributes, the page(s) you request and receives information via local storage, or other technologies.
- We may further automatically record such information to track visits to our websites so that we may compile statistics that show the numbers and frequency of visitors to our website and its individual pages; such statistics may include your web request, internet protocol address, browser type, browser language, and the date and time of your request.
- We may enhance or merge your information collected from our website with data from third parties for purposes of marketing products or services to you. We may further, present links in a format that enables us to keep track of whether these links have been followed.
- You can remove data stored in your computer via your browser settings.

## TRANSACTION INFORMATION

- If you become a registered user or if you conduct transactions through the Site, we also collect and maintain transactional information including without limitation, credit card information, payment amounts, billing information, transaction type (“Transaction Information”). We may use Transaction Information for the purpose of establishing and verifying the identity of users, processing, servicing or enforcing transactions and sending related communications, and for providing support services in relation to the transactions. We shall not use Transaction Information for any purposes other than as provided under this Privacy Policy without your express consent.

## 7.INTERACTIVE AREAS

Users may be permitted access to certain interactive areas of the website such as user comments. You should be aware that we do not monitor or have control over any information voluntarily disclosed within these interactive areas and shall not be responsible for any malicious or inappropriate use of such information by any third party. We do not guarantee the privacy of any information voluntarily disclosed by you in these interactive areas and you are required to evaluate for yourself, the implications and potential risks of disclosing any personally data in these interactive areas.

## 8.INFORMATION SHARING

Unless we notify you otherwise, we will share your information with companies or entities only in circumstances where:

- You have provided instructions or consent towards such sharing;
- Such information is being shared for the purpose of processing personal information on our behalf. We require that these parties agree to process such information based on our instructions and in compliance with this Privacy Policy and any other appropriate confidentiality and security measures; or
- We have a good faith belief that access, use, preservation or disclosure of such information is reasonably necessary to (a) satisfy any applicable law, regulation, legal process or enforceable governmental or regulatory request, (b) enforce applicable terms of use of the website, including investigation of potential violations thereof, (c) detect, prevent, or otherwise address fraud, security or technical issues, or (d) protect against imminent harm to the rights, property or safety of Mzaalo, its users or the public as required or permitted by law.
- If Mzaalo becomes involved in a merger, acquisition, or any form of sale of some or all of its assets, we will ensure the confidentiality of any personal information involved in such transactions and provide notice before personal information is transferred and becomes subject to a different privacy policy.
- By using Mzaalo and submitting personal information to Mzaalo, you agree to permit the transfer of your personal information to countries outside your country of residence for storage, processing and other uses as permitted under this Privacy Policy and applicable law.

## 9.MODIFICATION AND DELETION OF INFORMATION

- You can edit your Mzaalo account information, including your preferences. We reserve the right to send you certain communications relating to the Mzaalo Services, such as service announcements, administrative messages and other information, that are considered part of your Mzaalo account.
- You can delete your Mzaalo account by sending an email to: [support@xfinite.io](mailto:support@xfinite.io). Mzaalo reserves the right to decline requests that require disproportionate technical effort, are impractical, jeopardize the privacy of others, impede payment for the service, interfere with the enhancement of the service, or which is otherwise not required by applicable law.
- In addition to your Mzaalo account information, in accordance with the provisions of the Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Data or Information) Rules, 2011, you have the right to review the personal information that has been collected from you and correct any inaccurate or insufficient information. Should you wish to review such information or provide any corrections to the same, please email us at [support@xfinite.io](mailto:support@xfinite.io). You also have the option to withdraw your consent given to Mzaalo to use such personal information, should you wish to exercise this option, please email us at [support@xfinite.io](mailto:support@xfinite.io). Do note however that, upon withdrawal of your consent, your account will be permanently deleted and you shall no longer have access to any of the Mzaalo products or services.

## 10.SECURITY OF INFORMATION

- We believe that we have instituted appropriate physical, electronic, and managerial procedures to safeguard and secure the Registration Information and Transaction Information we collect. These procedures include online including internal reviews of our data collection, storage and processing practices and other reasonable security measures which are equivalent to security measures that we use to protect our own sensitive and confidential information. All Transaction Information are stored on the secure servers of a PCI Data Security Standard (PCI DSS) Level 1 compliant service provider.
- We limit access to personal information about you to employees who we believe reasonably need to come into contact with that information to provide products or services to you or in order to do their jobs.

## 11.THIRD PARTY ADVERTISERS, LINKS TO OTHER SITES

We allow other companies, called third party ad servers or ad networks, to serve advertisements within our website. These third-party ad servers or ad networks use technology to send, directly to your browser, the advertisements and links that appear on our website. They automatically receive your IP address when this happens. They may also use other technologies (such as cookies, JavaScript, or Web Beacons) to measure the effectiveness of their advertisements and to personalize the advertising content you see. We do not provide any Personal Data to these third-party ad servers or ad networks without your consent or except as part of a specific program or feature for which you may request to opt-out. However, please note that if an advertiser asks Us to show an advertisement to a certain audience (for example, men aged 18-34) or audience segment (for example, men aged 18-24 who have viewed certain channels of content) and you respond to that advertisement, the advertiser or ad server may conclude that you fit the description of the audience they are trying to reach. The advertiser may also use information regarding your use of our website, such as the number of times you viewed an ad (but not any Personal Data), to determine which ads to deliver to you.

## 12.THIRD PARTIES WITH WHOM WE SHARE YOUR DATA

You should consult the respective privacy policies of these third party ad servers or ad networks on their practices and for instructions on how to opt-out of certain practices. Our privacy policy does not apply to, and we cannot control the activities of, such other advertisers or web sites.

## 13. INFORMATION ABOUT LOCAL STORAGE

- For the purposes of use as described above, we may use “local storage”. Data placed in local storage is per origin—the combination of protocol, host name, and port number as defined in the same-origin policy. The data is available to all scripts loaded from pages from the same origin that previously stored the data and persists after the browser is closed. We use local storage to improve the quality of our service and one of the primary purposes of local storage is to store your preferences and other information on your computer in order to save your time by eliminating the need to repeatedly enter the same information.
- We cannot control, and nor shall we be responsible for any malicious use of these local storage by any third parties. The web browsers automatically accept local storage which can be deleted later on. If you choose to delete data in local storage, any settings and preferences controlled by those local storage, including advertising preferences, will be deleted and may need to be recreated.

## 14. OUR COMMITMENT TO CHILDREN'S PRIVACY

Protecting the privacy of young children is especially important. For that reason, we do not knowingly collect or maintain Personal Data or non-Personal Data on our website from persons below 18 years of age, and no part of our website is directed to persons below the age of 18 years. If you are under 18 years of age, then please do not use or access our website at any time or in any manner. If we learn that Personal Data of persons below 18 years of age has been collected on our website, then we will take appropriate steps to delete this information. We do not target children with our services. If you have questions about our Site or Privacy Policy, please feel free to contact the Mzaalo Privacy Coordinator at [privacy@xfinite.io](mailto:privacy@xfinite.io)

## 15. CHANGES TO STATEMENT

- Please note that this Privacy Policy may change from time to time. We will post any Privacy Policy changes on this page. You should routinely check our website for changes to our privacy policy. If we post an updated privacy policy on the Mzaalo website, by subsequently using the Mzaalo service you agree to the terms of the updated privacy policy. If you don't agree with the new Privacy Policy, please discontinue your access to our Site and the Mzaalo Services.

## 16. ENFORCEMENT AND CONTACT

- We regularly review our compliance with this Privacy Policy. If you have questions about this statement or believe that we have not adhered to it, please contact us at: [legal@xfinite.io](mailto:legal@xfinite.io). When we receive formal written complaints, it is Mzaalo's policy to contact the complaining user regarding his or her concerns. We will cooperate with the appropriate regulatory authorities, including local data protection authorities, to resolve any complaints regarding the transfer of personal data that cannot be resolved between Mzaalo and an individual.
- Information governed by this Privacy Policy is collected and stored by:  
**XFINITE GLOBAL PLC**  
171 Old Bakery Street,  
Valletta, VLT 1455, Malta
- Where any other agencies are engaged by Mzaalo to collect, store or process any information governed by this Privacy Policy, the names and addresses of such agencies shall be notified.