



PRIVACY NOTICE POLICY

BACKGROUND:

PIM Limited (“**PIM**” or “**we/us**”) understands that your privacy is important to you and that you care about how your personal data is used. PIM respects and values the privacy of all of our employees, customers, suppliers and stakeholders and will only collect and use personal data in ways that are described here, and in a way that is consistent with PIM obligations and your rights under the law.

1. **Information About Us**

PIM Limited

Registered under BRN C06001808, VAT Nu 20002341

Having its registered office at Quay D, Port Louis, Mauritius.

2. **What Does This Notice Cover?**

This Privacy Information explains how PIM uses your personal data: how it is collected, how it is held, and how it is processed. It also explains your rights under the law relating to your personal data.

3. **What Is Personal Data?**

Personal data is defined by the Data Protection Act 2017 (“the Law”) as any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier.

Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

The personal data that PIM uses is set out in Part 5, below.

4. **What Are My Rights?**

Under the Law, you have the following rights, which PIM will always work to uphold:

- a) The right to be informed about PIM collection and use of your personal data. This Privacy Notice should tell you everything you need to know, but you can always contact us to find out more or to ask any questions using the details in Part 11.
- b) The right to access the personal data PIM holds about you. Part 10 will tell you how to do this.

- c) The right to have your personal data rectified if any of your personal data held by PIM is inaccurate or incomplete.
- d) The right to be forgotten, i.e. the right to ask PIM to delete or otherwise dispose of any of your personal data that PIM holds.
- e) The right to restrict (i.e. prevent) the processing of your personal data.
- f) The right to object to PIM using your personal data for a particular purpose or purposes.
- g) The right to withdraw consent. This means that, if PIM is relying on your consent as the legal basis for using your personal data, you are free to withdraw that consent at any time.
- h) The right to data portability. This means that, if you have provided personal data to PIM directly, PIM is using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask PIM for a copy of that personal data to re-use with another service or business in many cases.
- i) Rights relating to automated decision-making and profiling. PIM do not use your personal data in this way.

For more information about PIM use of your personal data or exercising your rights as outlined above, please contact us using the details provided in Part 11.

It is important that your personal data is kept accurate and up-to-date. If any of the personal data PIM holds about you changes, please keep us informed as long as we have that data.

Further information about your rights can also be obtained from the Data Protection Office in Mauritius. If you have any cause for complaint about PIM use of your personal data, you have the right to lodge a complaint with the Data Protection Office. PIM would welcome the opportunity to resolve your concerns ourselves, however, so please contact us first, using the details in Part 11.

5. What Personal Data Do You Collect and How?

PIM may collect and hold some or all of the personal and non-personal data set out in the table below, using the methods also set out in the table. PIM do not collect personal data relating to children.

Data Collected	How We Collect the Data
Identity Information including NIC, passport number, names, last names, date of birth, signatures and initials, driving license number.	Directly from employees, suppliers and consultants
CCTV images of employees and visitors.	Directly from CCTV installed at PIM premises
Contact information including address, email address, phone numbers and job title.	Directly from employees, visitors, customers, website users, suppliers or their representatives, representatives of stakeholders through emails or website

	contact form
Business information including job category, BRN, VAT number, grade, employee code, confirmation letter, directorships, position, competencies, years of experience, Academic background, work experience, seniority in the company.	Directly from employees, consultants and self-employed suppliers
Payment and tax information including bank account details, bank-credit insurance (on employees, suppliers and consultants) Salaries, fringe benefits, contract of employment, payslip, allowances and bonuses, TAN, information on dependents (name, age, relationship, spouse work place if applicable, next of kin details) on employees only.	Directly from employees, consultants and self-employed suppliers
Professional information: attendance, disciplinary reports, assignment history within PIM, appraisals, training course.	Directly from employees via surveys, attendance records and other documents/ disclosed to PIM
Health information: food preference/allergies, medical certificates, other health data to comply with safe and safety measures.	Directly from employees through employee file
Other sensitive information: trade union membership and data relating to criminal convictions.	Directly from employees
Profile information: including product preferences, purchase history.	Directly from customers through purchase history
Data from third parties including professional references, certificate of character.	Directly or indirectly via reference or search

6. How Do You Use My Personal Data?

Under the Law, PIM must always have a lawful basis for using personal data. The following table describes how PIM will use your personal data, and PIM's lawful bases for doing so:

What We Do	What Data We Use	Our Lawful Basis
HR administration including but not limited to payroll, payment of taxes, monitoring of staff, payment of benefits.	Identity information, CCTV images (for investigation of workplace incident), payment and tax information, contact details information, professional information, health information and other sensitive information	Performance of a contract Compliance with a legal obligation Legitimate interest (for data about criminal convictions and CCTV images)
Contracting third parties for services and products to carry out our activity	Identity information, contact information, business information and payment and tax information	Performance of a contract Legitimate interest (for data about criminal convictions and CCTV images)
Supplying our products to customers	Contact information, payment and tax information	Performance of a contract Compliance with a legal obligation
Assessing prospective customer relationships/ sending	Contact details	Consent
Personalising and tailoring our products	Profile information	Consent
Communicating with you	Contact details	Performance of a contract or Consent
Supplying you with information by email that you have opted-in-to (you may opt-out at any time)	Contact details	Consent.

PIM will only use your personal data for the purpose(s) for which it was originally collected unless PIM reasonably believes that another purpose is compatible with that or those original purpose(s) and need to use your personal data for that purpose.

If PIM needs to use your personal data for a purpose that is unrelated to, or incompatible with, the purpose(s) for which it was originally collected, we will inform you and explain the legal basis which allows us to do so.

In some circumstances, where permitted or required by law, PIM may process your personal data without your knowledge or consent. This will only be done within the bounds of the Law and your rights.

7. How Long Will You Keep My Personal Data?

PIM will not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. Your personal data will therefore be kept for the following periods (or, where there is no fixed period, the following factors will be used to determine how long it is kept):

Type of Individuals	Type of Data	How Long We Keep It
Employees and consultants	Identity Information, contact information, payment and tax information, health data, professional information, sensitive data	5 years as from the termination of the employment agreement or relationship
Suppliers	Identity Information, contact information, payment and tax information, business information	years as from the termination of the commercial relationship
Representative of suppliers	Contact information	Disposed of immediately after being notified that the person does no longer represent the supplier
Customers	Identity information, contact information, business information	<u>5</u> years as from the last transaction.
Customers	Profile information	2 years as from the consent or last positive contact
Prospective Customers, Website visitors	Contact information	2 years as from the date of consent/contact or last positive contact
Visitors	Contact information, ID, CCTV images	<u>One month</u>

8. How and Where Do You Store or Transfer My Personal Data?

PIM will only store your personal data in Mauritius

PIM will not store or transfer data outside Mauritius

Should PIM store or transfer personal data in or to other countries, said countries must provide an adequate level of protection for personal data.

Please contact us using the details below in Part 11 for further information about the particular data protection safeguards used by PIM when storing or transferring your personal data to a third country.

The security of your personal data is essential to us, and to protect your data, PIM takes a number of important measures, including the following:

- limiting access to your personal data to those employees, agents, contractors, and other third parties with a legitimate need to know and ensuring that they are subject to duties of confidentiality; and
- procedures for dealing with data breaches (the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, your personal data) including notifying you and/or the Data Protection Office where PIM is legally required to do so.

9. **Do You Share My Personal Data?**

PIM will not share any of your personal data with any third parties for any purposes, except banks, insurance companies, our auditors and lawyers where required to do so for the performance of our activities.

In some limited circumstances, PIM may be legally required to share certain personal data, which might include yours, if PIM is involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

10. **How Can I Access My Personal Data?**

If you want to know what personal data PIM has about you, you can PIM for details of that personal data and for a copy of it (where any such personal data is held). This is known as a “subject access request”.

All subject access requests should be made in writing and sent to the email or postal addresses shown in Part 11. To make this as easy as possible for you, a Subject Access Request Form is available for you to use. You do not have to use this form, but it is the easiest way to tell us everything we need to know to respond to your request as quickly as possible.

There is not normally any charge for a subject access request. If your request is ‘manifestly unfounded or excessive’, a fee may be charged to cover our administrative costs in responding.

PIM will respond to your subject access request not more than one month of receiving it. Normally, PIM aims to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date PIM receives your request. You will be kept fully informed of our progress.

11. **How Do I Contact You or the Regulator?**

To contact us about anything to do with your personal data and data protection, including to make a subject access request, please use the following details:

For the attention of PIM Data Protection Officer

Email address: pim@pimltd.mu

Telephone number: 2163000

Postal Address: Quay D, Port Louis

If you believe that PIM has not complied with your data protection rights, you have the right to make a complaint to the Mauritian Data Protection Office. You can contact them to the following address:

Data Protection Office
Level 5, SICOM Tower,
Wall Street, Ebene Cyber City, Mauritius

Phone: +230 460 0251
Email: dpo@govmu.org

12. **Changes to this Privacy Notice**

PIM may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if we change our business in a way that affects personal data protection.

Any changes will be made available via our website. This Privacy Notice was last updated on the 1st of September 2023.