



# **Website Privacy Policy for Catering Industry Pension Fund (CIPF)**

**Effective Date:** 2/8/2025

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## 1. Introduction

Catering Industry Pension Fund ("we," "us," or "our") is committed to protecting the privacy and confidentiality of personal data. This Privacy Policy outlines how we collect, use, disclose, and safeguard your personal data in compliance with the Cyber and Data Protection Act [Chapter 12:07] of Zimbabwe ("CDPA"). By engaging with our services or accessing our website, you agree to the terms outlined in this policy.

## 2. Definitions

- **Personal Data:** Any information relating to an identified or identifiable natural person ("data subject").
- **Processing:** Any operation performed on personal data, including collection, storage, use, disclosure, or deletion.
- **Data Controller:** The entity that determines the purposes and means of processing personal data.
- **Data Processor:** The entity that processes personal data on behalf of the Data Controller.
- **Data Subject:** An individual whose personal data is processed.
- **Consent:** Any freely given, specific, informed, and unambiguous indication of the data subject's wishes by which they signify agreement to the processing of personal data.

## 3. Data Controller and Data Protection Officer

Catering Industry Pension Fund operates as the Data Controller concerning your personal data. We have appointed a Data Protection Officer (DPO) to oversee compliance with data protection laws:

- **Name:** Abel Moyo
- **Email:** [dpo@cipf.co.zw](mailto:dpo@cipf.co.zw)
- **Phone:** [+\(263\) 08677 234567](tel:+26308677234567)

#### 4. Personal Data We Collect

We may collect various types of personal data, including:

##### a. Information You Provide

- **Contact Details:** Name, address, email, phone number.
- **Identification Information:** National ID, passport number.
- **Financial Information:** Bank account details, payment information.
- **Professional Information:** Employment history, qualifications.
- **Health Information:** Medical records, health status (only when necessary for specific services).

##### b. Information We Collect Automatically

- **Technical Data:** IP address, browser type, operating system.
- **Usage Data:** Pages visited, time spent on our website, navigation paths.
- **Location Data:** Geographical location based on IP address.

##### c. Information from Third Parties

- **Due Diligence Reports:** Information from external legal advisers or compliance checks.
- **Public Records:** Data from publicly accessible sources.

#### 5. Legal Basis for Processing

We process your personal data based on the following legal grounds:

- **Consent:** When you have given explicit consent for specific purposes.
- **Contractual Necessity:** To perform a contract to which you are a party or to take steps at your request before entering into a contract.
- **Legal Obligation:** To comply with legal and regulatory obligations.

- **Legitimate Interests:** To pursue our legitimate business interests, provided they do not override your rights and freedoms.

## 6. Purposes of Processing Personal Data

Your personal data may be processed for the following purposes:

- **Service Delivery:** To provide, manage, and personalize our services.
- **Customer Support:** To respond to inquiries, complaints, and feedback.
- **Compliance:** To adhere to legal and regulatory requirements, including anti-money laundering obligations.
- **Marketing:** To inform you about our products, services, and events (subject to your consent where required).
- **Security:** To ensure the security of our systems, prevent fraud, and protect our interests.

## 7. Consent

Where processing is based on your consent, you have the right to withdraw consent at any time. Withdrawal does not affect the lawfulness of processing based on consent before its withdrawal.

## 8. Data Sharing and Disclosure

We may share your personal data under the following circumstances:

### a. Third-Party Service Providers

We engage third-party service providers to perform functions on our behalf, such as:

- **IT Services:** Hosting, maintenance, and support of our systems.
- **Professional Advisors:** Legal, financial, and business consultants.
- **Compliance Services:** Anti-money laundering and due diligence checks.

These providers are contractually obligated to process personal data only as necessary to provide services to us and in compliance with applicable laws.

### b. Legal Obligations

We may disclose your personal data to governmental authorities or law enforcement agencies if required by law or in response to legal processes.

### c. Business Transfers

In the event of a merger, acquisition, or sale of assets, your personal data may be transferred to the involved third parties, subject to confidentiality agreements.

## 9. International Data Transfers

If we transfer your personal data outside Zimbabwe, we will ensure appropriate safeguards are in place, such as:

- **Adequacy Decisions:** Transfers to countries deemed to provide an adequate level of data protection.
- **Standard Contractual Clauses:** Agreements incorporating standard data protection clauses.
- **Binding Corporate Rules:** Internal policies ensuring data protection within our corporate group.

## 10. Data Security Measures

We implement technical and organizational measures to protect your personal data, including:

- **Encryption:** Securing data in transit and at rest.
- **Access Controls:** Restricting access to authorized personnel only.
- **Regular Audits:** Conducting security assessments and vulnerability testing.
- **Training:** Educating employees on data protection and security protocols.

## 11. Data Retention

We retain your personal data only for as long as necessary to fulfill the purposes for which it was collected or as required by law. Factors influencing retention periods include:

- **Legal Obligations:** Compliance with regulatory requirements.
- **Dispute Resolution:** Addressing any complaints or legal claims.
- **Business Needs:** Operational requirements and service delivery.

## 12. Your Rights as a Data Subject

Under the CDPA, you have the following rights:

### a. Right to Access

You can request confirmation of whether we process your personal data and access to the data, including information on how and why it is processed.

#### **b. Right to Rectification**

You have the right to request correction of inaccurate or incomplete personal data.

#### **c. Right to Erasure**

You can request the deletion of your personal data under certain conditions, such as when it is no longer necessary for the purposes it was collected.

#### **d. Right to Restriction of Processing**

You have the right to request that we restrict the processing of your personal data under certain circumstances, such as when you contest the accuracy of the data or when the processing is unlawful and you oppose erasure. When processing is restricted, we will only store your data without further processing until the restriction is lifted.

#### **e. Right to Data Portability**

Where applicable, you have the right to receive your personal data in a structured, commonly used, and machine-readable format and to transmit that data to another data controller, provided that the processing is based on your consent or a contract and is carried out by automated means.

#### **f. Right to Object**

You have the right to object to the processing of your personal data based on our legitimate interests or for direct marketing purposes. If you exercise this right, we will cease processing your data unless we demonstrate compelling legitimate grounds for continuing the processing that override your interests, rights, and freedoms.

#### **g. Right to Withdraw Consent**

If the processing of your personal data is based on your consent, you have the right to withdraw that consent at any time. Withdrawal will not affect the lawfulness of processing based on consent before its withdrawal.

#### **h. Right to Lodge a Complaint**

If you believe that we have processed your personal data in a manner that infringes your rights under the CDPA, you have the right to lodge a complaint with the relevant supervisory authority.

### **13. Children's Privacy**

Our services are not directed to individuals under the age of 16. We do not knowingly collect personal data from children without appropriate parental consent. If we become aware that we have inadvertently collected personal data from a child under 16, we will take steps to delete that information as soon as possible.

## **14. Cookies and Tracking Technologies**

Our website uses cookies and similar tracking technologies to enhance your browsing experience, analyze website traffic, and personalize content. Cookies are small text files stored on your device that help us recognize you on subsequent visits. You can control the use of cookies through your browser settings; however, disabling cookies may affect your ability to use certain features of our website.

## **15. Links to Other Websites**

Our website may contain links to third-party websites that are not operated or controlled by Catering Industry Pension Fund. We are not responsible for the privacy practices of these external sites. We encourage you to review the privacy policies of any third-party websites you visit.

## **16. Changes to This Privacy Policy**

We may update this Privacy Policy from time to time to reflect changes in our practices, legal requirements, or technological advancements. When changes are made, we will update the "Effective Date" at the top of the policy and, where appropriate, notify you through our website or by email. We encourage you to review this policy periodically to stay informed about how we are protecting your personal data.

## **17. Contact Information**

If you have any questions, concerns, or requests regarding this Privacy Policy or our data processing practices, please contact us using the information below:

- **Email:** [dpo@cipf.co.zw](mailto:dpo@cipf.co.zw)
- **Postal Address:**  
Catering Industry Pension Fund  
87 Selous Ave,  
Harare, Zimbabwe
- **Phone:** [+\(263\) 08677 234567](tel:+26308677234567)
- **Data Protection Officer (DPO):**  
Abel Moyo  
Email: [dpo@cipf.co.zw](mailto:dpo@cipf.co.zw)  
Phone: [+\(263\) 08677 234567](tel:+26308677234567)