

## **PRIVACY NOTICE**

IBL Ltd, trading as BrandActiv (thereafter "BrandActiv", "we", "us", "our", "the Company"), respects your privacy, and is committed to protecting the privacy, confidentiality and security of the personal data you provide us when you use our website, when you contact our office, when you visit our offices or team members, when you participate to our marketing events or lottery games that we organise, you respond to our surveys or when you otherwise interact with us.

Please read this privacy notice carefully as it contains important information on how BrandActiv, as a registered data controller under IBL Ltd, treat the personal data that you provide us.

### **1. Who are we?**

BrandActiv which forms part of IBL Ltd (a public company incorporated in Mauritius and listed on the stock exchange of Mauritius) is specialized in the commercialization of a wide variety of fast-moving consumer goods in Mauritius, Madagascar and Seychelles. Our commercial activity is split into three business categories, namely Food & Beverage, Frozen & Chilled and Personal & Home Care.

Our registered office is situated at IBL House, Caudan Waterfront, Port Louis, Mauritius and our principal place of business is situated at IBL Complex No 2, Riche Terre, Mauritius.

### **2. Which personal data we collect?**

Personal data, or personal information, means any information about a living individual from which, that individual can be directly or indirectly identified.

When you interact with us, we may process different types of personal data about you such as:

- your name and surname;
- your national identity card number;
- your passport details;
- your residential address;
- your contact details (phone and fax numbers, email addresses);
- CV, pictures and qualifications details when you either spontaneously apply for a job at BrandActiv or respond to a vacancy notice;
- your photos and videos (for human capital, marketing or events purposes);
- any other personal data necessary to fulfil your special requests; and
- any other personal data that you choose to provide to us.

Also, when you choose to receive our marketing communications (including newsletters, promotional and special offers), we ask that you provide us with your email address. The provision of this information is purely voluntary, and you may opt out of receiving our marketing communications at any time by unsubscribing to these communications.

### **3. How and why we use your personal data?**

We use your personal data in the course of our business activities and interaction with you for the following purposes:

- performing our agreement with you;
- promoting eventual business relationships;
- assisting you with your queries or concerns;
- processing and delivering your order, including:
  - Manage payments, fees and charges
  - Collect and recover money owed to us within the limits of the authorization you have given us.
- treating your applications for specific job vacancies or on a spontaneous basis;
- Performing recruitment analytics with CVs received;

- ensuring security of our offices and people;
- keeping an accurate evacuation list in case of emergency
- Keeping a log of visitors at our sites;
- complying with any legal or regulatory obligations imposed on us;
- promoting our corporate initiatives (events, cocktails etc) on BrandActiv social medias;
- participating to any events and lottery games that we organise;
- participating to our advertisements or promoting BrandActiv image;
- performing an internal and/or police investigation regarding a suspected fraud or other offence which may have been committed;
- fulfilling our legitimate commercial interests;
- sending you communications if you have consented to receiving the same, and for any other purposes for which we have your consent;
- using data analytics to improve our website, products / services, marketing, customer relationships and experiences; and
- making suggestions and recommendations to you on products or services that may be of interest to you.

## **5. Direct Marketing**

From time to time, we could use your name and contact information to send you either via emails, post, or social media, information that we think may be of interest to you, including stories, events, products and services offered by BrandActiv, as well as special offers and promotions and surveys but we can only do so with your consent.

You will also be able to opt-out from receiving marketing communications at any time, free of charge, by following the unsubscribe instructions contained in each of our marketing communications or by contacting us at [info@brandactiv.mu](mailto:info@brandactiv.mu).

## **6. To whom do we disclose personal data?**

Your personal data may be shared as follows:

- between and among subsidiaries and affiliates of the IBL Group as may be relevant for specific purposes set out in section 3 above and to facilitate our business activities or relationship, but we shall only do so on a strictly need to know basis;
- with our employees for purposes of fulfilling our business activities, organizing events and lottery games, treating job applications or conducting internal analysis with a view to improving our company and services;
- with our agents, advisers, accountants, auditors, lawyers, other professional advisors, contractors or third-party service providers for the purpose of assisting us to better manage, support or develop our business and comply with our legal and regulatory obligations;
- trusted third parties (such as website host) who help us operate our website or fulfill our contractual obligations or conduct our business, as long as such parties agree to keep this information confidential;
- With regulatory bodies and medias for the performance of our lottery games, when applicable; and
- We believe it is necessary to share information with law enforcement bodies/agencies in order to investigate, prevent or take actions regarding illegal activities, suspected fraud, situations involving potential threats to the physical safety of any person, violations of our terms and conditions, or when required by law.

We will ensure that your personal data is kept safely. Only designated persons will have access to your personal data on a strictly need-to-know basis for the purposes of fulfilling our agreement, treating job applications or promoting our business relationship with you. In addition, third parties with whom we share your personal data will be contractually obliged to safeguard all personal data to which they have access.

Some disclosures do not require your consent. This happens when we share your personal data with (i) law enforcement bodies/agencies and other statutory authorities, if required by law and (ii) if required or authorized by law or if we suspect any unlawful activities on your part.

Where we have collected your personal data on behalf of another party, the use of your personal data by that party is governed by their privacy policy for which we are not responsible. We may also disclose aggregate or de-identified/anonymized/encrypted data that is not personally identifiable with third parties, including our commercial and strategic partners.

## **7. Overseas transfers of your personal data**

In some cases, we may need to transfer your personal data with organisations located in countries outside our territorial limits in order to provide our services to you. We will take appropriate safeguards in order to secure the personal data being transferred.

Please note that:

- The anti-spam and anti-virus filtering are done by a service provider located in South Africa.
- E-mails servers and e-filing system servers are transferred on Microsoft data cloud based in Ireland.
- Personal data collected through our website is transferred to servers based in Ireland.

## **8. How long do we keep your information?**

Your personal data will be stored for as long as required to fulfil our business purposes and for the period of time required by law. To the extent required by law, we will take reasonable steps to destroy or anonymise personal data in a secure manner when we no longer need it for the purposes for which it was collected (as set out in section 3 of this notice) and retention is no longer necessary for legal or business purposes.

## **9. Processing of personal data must be justified**

We will only process your personal data where we are satisfied that we have an appropriate legal basis to do so, such as (i) for the performance of a contract between us; (ii) where you have provided us with your express consent to process your personal data for a specific purpose; (iii) our use of your personal data is necessary to fulfill our statutory obligations with relevant authorities (regulators, tax officials, law enforcement bodies) or otherwise meet our legal responsibilities; (iv) our use of your personal data is in our legitimate interest as a commercial organisation.

## **10. Security of personal data**

BrandActiv has in place reasonable physical, technical and organisational measures to prevent unauthorised or accidental access, processing, erasure, loss or use of your personal data and to keep your personal data confidential. These measures are subject to ongoing review and monitoring.

We cannot guarantee that our website will function without disruptions. We shall not be liable for damages that may result from the use of electronic means of communication, including, but not limited to, damages resulting from the failure or delay in delivery of electronic communications, interception or manipulation of electronic communications by third parties or by computer programs used for electronic communications and transmission of viruses.

## **11. Children and Minors**

Except where required by local laws, we do not knowingly collect personal data from minors. If you are a minor, you may only use our website and services with the permission of your parent or guardian.

## **12. Links to other websites**

Our website may contain links to other websites, apps, content, services or resources on the internet which are operated by subsidiaries and affiliates of IBL or third parties. If you access other websites, apps, content, services or resources using the links provided, please be aware they may have their own privacy policy, and we do not

accept any responsibility or liability for these policies or for any personal data which may be collected through these sites. Please check these policies before you submit any personal information to these other websites.

### **13. Access to your personal data**

You have the right to request a copy of the personal data we hold about you. To do this, simply contact our Data Protection Officer and specify what data you would like. We will take all reasonable steps to confirm your identity before providing details of your personal data.

You will not have to pay a fee to access your personal data (or to exercise any of your other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

### **14. Correction of your personal data**

You have the right to ask us to update, correct or delete your personal data. We will take all reasonable steps to confirm your identity before making changes to personal data we may hold about you. We would appreciate it if you would take the necessary steps to keep your personal data accurate and up-to-date by notifying us of any changes we need to be aware of.

### **15. Withdrawal of consent and request for deletion of personal data**

You may also withdraw your consent to receiving direct marketing communications, or more generally to our processing of your personal data, at any time, and you may in certain circumstances ask us to delete your personal data. However, we may not be able to fulfil our contractual obligations to you if you entirely withdraw your consent or ask us to delete your personal data entirely. To protect your personal data, we shall require that you first prove your identity to us at the time the request is made, for instance by providing a copy of your national identification card, contact details or answering some other security questions to satisfy ourselves of your identity before we may proceed with your request(s).

Whenever reasonably possible and required, we will strive to grant these rights within 30 days, but our response time will depend on the complexity of your requests. We will generally respond to your requests free of charge unless if your request involves processing or retrieving a significant volume of data, or if we consider that your request is unfounded, excessive or repetitive in which case we reserve the right to charge a fee (as mentioned above regarding access).

There may be circumstances where we are not able to comply with your requests, typically in relation to a request to erase your personal data or where you object to the processing of your personal data for a specific purpose or where you request that we restrict the use of your personal data where we need to keep your personal data to comply with a legal obligation or where we need to use such information to establish, exercise or defend a legal claim. To make these requests, or if you have any questions or complaints about how we handle your personal data, or would like us to update the data we maintain about you and your preferences, please contact our Data Protection Officer at the address set out under section 19 below.

### **16. Cookies policy**

Our website uses cookies.

#### **What is a cookie?**

Cookies are small data files that your browser places on your computer or device. Cookies help your browser navigate a website and the cookies themselves cannot collect any data stored on your computer or your files. When a server uses a web browser to read cookies they can help a website deliver a more user-friendly service. To protect your privacy, your browser only gives a website access to the cookies it has already sent to you.

#### **Why do we use cookies?**

We use cookies to learn more about the way you interact with our content and help us to improve your experience when visiting our website. Cookies remember the type of browser you use and which additional browser software you have installed. They also remember your preferences, such as language and region, which remain as your default settings when you revisit the website. Cookies also allow you to rate pages and fill in comment forms.

#### **Categories of cookies we use on our website:**

Strictly Necessary Cookies: These cookies are fundamental to website functionality and cannot be switched off without blocking features on the site. Necessary cookies help make a website usable by enabling basic functions like page navigation and access to secure areas of the website.

Google analytics Cookies: These cookies allow us to gather analytics to improve the performance and functionality of our site by collecting and reporting information anonymously. They help us measure how users interact with our website content. These analytics can include measurements on the popularity of a page, common patterns of how people browse around the site, and how frequently a certain feature is used. We usually aggregate the data for review but in some cases, we may collect information on content you have viewed in order to understand what interests you most.

Marketing cookies: these cookies are used to track visitors across websites. The intention is to display ads that are relevant and engaging for the individual user and thereby more valuable for publishers and third-party advertisers.

We use 2 types of Facebook cookies: they are used by Facebook to deliver a series of advertisement products such as real time bidding from third party advertisers. The main purpose of this cookie is: Targeting/Advertising.

#### **How are third party cookies used?**

For some of the functions within our websites we use third party suppliers, for example, when you visit a page with videos embedded from or links to YouTube. These videos or links (and any other content from third party suppliers) may contain third party cookies and you may wish to consult the policies of these third party websites for data regarding their use of cookies.

#### **How do I reject and delete cookies?**

We will not use cookies to collect personally identifiable data about you. However, should you wish to do so, you can choose to reject or block the cookies set by the websites of any third party suppliers by changing your browser settings – see the Help function within your browser for further details. Please note that most browsers automatically accept cookies so if you do not wish cookies to be used you may need to actively delete or block the cookies.

You can also visit [www.allaboutcookies.org](http://www.allaboutcookies.org) for details on how to delete or reject cookies and for further data on cookies generally. For data on the use of cookies in mobile phone browsers and for details on how to reject or delete such cookies, please refer to your handset manual. Note, however, that if you reject the use of cookies you will still be able to visit our websites but some of the functions may not work correctly.

### **17. Amendments to this Privacy Notice**

We may amend this privacy notice from time to time. Any amendment will be posted on our website so that you are always informed of the way we collect and use your personal data. Any changes to this privacy notice will become effective upon posting of the revised privacy notice on the website. Use of our website following such changes constitutes your acceptance of the revised privacy notice then in effect but, to the extent such changes have a material effect on your rights or obligations as regards our handling of your personal data, such changes will only apply to personal data after the changes are applied.

### **18. Miscellaneous**

This privacy notice is governed by and shall be construed in accordance with the laws of the Republic of Mauritius. This privacy notice is written in the English language and may be translated into other languages. In the event of any inconsistency between the English version and the translated version of this privacy notice, the English version shall prevail.

#### **19. How to contact us?**

We have appointed a Data Protection Officer to oversee compliance with and questions in relation to this notice. If you have any questions about this notice, including any requests to exercise your legal rights, please contact our Data Protection Officer using the details set out below:

The Data Protection Officer  
IBL LTD  
IBL House, Caudan Waterfront  
Port Louis, Mauritius  
DPofficer@iblgroup.com  
203 2000

#### **20. Complaints**

If you believe we have not handled your personal data or attended to your request in an appropriate manner, you may lodge a complaint with the Data Protection Commissioner (DPC) (The Data Protection Office, 5th floor, SICOM Tower, Wall Street Ebène, Mauritius). However we ask that you please try to resolve any issues with us first before referring your complaint to the DPC.

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