



PRIVACY NOTICE

For all data subjects — employees, contractors, customers, suppliers, community members, visitors, board members and all others whose personal data is processed by Allied Timbers Zimbabwe.

Version 1.0 |

Issued under Data Protection Policy DP001 | Cyber and Data Protection Act [Chapter 12:07] (2021)

What is this document?

This Privacy Notice tells you — as someone whose personal data Allied Timbers Zimbabwe collects or uses — what data we hold about you, why we hold it, who we share it with, how long we keep it, and what your rights are under the Cyber and Data Protection Act [Chapter 12:07] (2021). This Notice is issued under and must be read together with our Data Protection Policy (DP001).

1. WHO WE ARE

Allied Timbers Zimbabwe (Private) Limited is Zimbabwe's leading timber production and processing company, operating under the Mutapa Investment Fund. We are a registered Data Controller under the Cyber and Data Protection Act [Chapter 12:07] (2021) (CDPA).

Data Protection Officer (DPO): Nomthandazo Sibanda

Email: nsibanda@alliedtimbers.co.zw | Phone: +263 774 307 528

Address: 125A Borgward Road, Msasa, Harare, Zimbabwe

Website: www.alliedtimbers.co.zw | General enquiries: info@alliedtimbers.co.zw

Regulator: POTRAZ – www.potraz.gov.zw

2. WHAT DATA WE COLLECT AND WHY

We only collect and use personal data for specific, legitimate purposes. We must also have a legal basis for every processing activity under the CDPA. The table below sets out all the purposes for which Allied Timbers Zimbabwe (Private) Limited processes personal data and the legal basis relied upon in each case.

Who You Are	What We Collect	Why We Collect It
Employees	Name, ID, contact details, bank details, tax PIN, salary, leave, performance, health/medical records (where legally required), next-of-kin.	Employment contract; NSSA & ZIMRA compliance; payroll.
Job applicants	CV, application form, interview notes, reference checks, qualifications, national ID.	Assessing your application; recruitment.
Contractors & harvesting operators	Name, ID, licence, equipment registration, permits, GPS/location data from equipment, production records, site induction, medical fitness certificate.	Contract management; site safety; NSSA compliance; Forestry Commission & EMA reporting.
Customers & buyers	Company name, contact person, phone, email, billing address, purchase history, credit terms.	Managing your order, invoicing and payments.
Suppliers & vendors	Company name, contact person, ID/registration, bank details, tax PIN, KYC records, tender documents.	Procurement; payments; anti-corruption due diligence.
Community members	Name, village/ward, land tenure documents, FPIC consent records, benefit-sharing records, grievance records.	Carbon project management; community engagement; ESG reporting.
Board members & shareholders	Name, ID/passport, address, shareholding, declarations of interest, remuneration.	Corporate governance; statutory filings (Companies Act).
Security staff & guards	Name, ID, ZRP clearance, shift records, firearm licence, incident reports.	Site security management; ZRP compliance.
Visitors	Name, ID, organisation, visit purpose, vehicle registration, date and time.	Site security; access control; safety.
Media & marketing contacts	Name, organisation, email, phone, event attendance, photographs/video at events.	Media relations; marketing communications; CSR.
Website visitors	IP address, browser type, pages visited, form submissions.	Website security; responding to enquiries.

3. WHY WE ARE ALLOWED TO USE YOUR DATA

The law requires us to have a valid reason — called a 'legal basis' — for every time we use personal data. Depending on the situation, we rely on one or more of the following:

- Contract — we need your data to carry out a contract with you or to prepare one at your request (e.g., employment contracts, supplier agreements, customer orders).
- Legal obligation — the law requires us to process your data (e.g., NSSA contributions, ZIMRA tax filings, Forestry Commission permits, Companies Act filings).
- Legitimate interest — we have a genuine business reason that does not override your rights (e.g., site security, CCTV, IT security logs, business development).
- Consent — where we ask for your permission and you give it freely (e.g., marketing emails, event photography, voluntary health disclosures, community FPIC for carbon projects). You can withdraw consent at any time.
- Vital interests — to protect your life or someone else's in an emergency.

A note on consent:

Where we rely on your consent as our legal basis (for example, for marketing communications, event photography, or voluntary health disclosures), you have the right to withdraw your consent at any time. Withdrawal will not affect anything we have done lawfully before the withdrawal. To withdraw consent, please contact our DPO at nsibanda@alliedtimbers.co.zw.

4. SENSITIVE DATA

Some data needs extra care. We handle the following categories with the highest level of protection and only where the law specifically allows it:

- Health and medical data — used for occupational health, NSSA compliance and workplace safety. Only the occupational health practitioner sees clinical records. HR only receives a fitness-for-work certificate.
- Biometric data — CCTV images, fingerprint access control and drone footage. Used for site security only. Accessible to authorised security personnel.
- Race and ethnicity — collected only with your explicit consent for ESG diversity reporting. Shared externally in aggregated, anonymous form only.
- Criminal records — ZRP clearance certificates for security personnel, processed under legal obligation.
- Community FPIC records — land tenure, consent and benefit-sharing records for carbon project communities. Treated with the highest confidentiality.
- Whistleblower identity — held in strict confidence by the Board Audit Committee and DPO only.

5. WHO WE SHARE YOUR DATA WITH

We do not sell your data. We only share it where necessary, with:

- Government bodies — ZIMRA, NSSA, Forestry Commission, EMA, ZRP, Ministry of Labour, CIPO, RBZ, POTRAZ, courts.
- Professional service providers — external auditors, legal counsel, occupational health practitioners, banks, pension fund managers, outsourced security company.
- Technology and website providers — IT support, cloud service providers, Mugonat Systems (our website developer). All are bound by Data Processing Agreements.
- Certification and standards bodies — FSC certification body, ISO certification body,
- Reporting bodies — ESG investors receive aggregated, anonymised data only.
- Freight and logistics — freight forwarders and customs agents for export operations.

All third parties who handle your data on our behalf sign a Data Processing Agreement committing them to keep your data secure and use it only for the agreed purpose.

6. SENDING YOUR DATA OUTSIDE ZIMBABWE

Some services we use are based outside Zimbabwe — including FSC and ISO certification platforms, carbon credit registries, cloud email and file storage, and international ESG reporting platforms. When this happens, we make sure proper safeguards are in place and we notify POTRAZ as required by law.

7. HOW LONG WE KEEP YOUR DATA

We only keep your data for as long as we need it. Key periods are:

- Employment contracts and employment history — 7 years after employment ends (Labour Act).
- Payroll, PAYE and remuneration records — 7 years from termination or 6 years from the relevant tax year, whichever is later (ZIMRA; Income Tax Act).
- NSSA contribution records — 10 years after termination of employment (NSSA Act).
- Leave records — 6 years from the relevant period (Labour Act; payroll compliance).
- Job application records (unsuccessful) — 2 years after completion of the recruitment process (HR Policy 423; Labour Act).
- Disciplinary records (minor offences) — 3 years after finalisation of the matter.
- Disciplinary records involving dismissal or litigation — 7 years after termination or final resolution of proceedings.
- Occupational health surveillance records — 40 years from last entry or until age 75, whichever is later (NSSA / ILO standard).
- Accident and injury records — indefinitely (NSSA requirement).
- Customer and supplier records — 7 years from the last transaction (Companies Act; Income Tax Act).
- Export and financial records — 7 years (Exchange Control Regulations; Income Tax Act).
- Board and statutory records — permanent (Companies Act).
- Carbon project and FPIC community records — duration of project plus 10 years.
- CCTV footage — 30-day rolling overwrite; incident footage up to 5 years.
- Visitor records — 12 months.
- Marketing and newsletter data — until you unsubscribe, plus 2 years.

When the retention period ends, your data is securely deleted or anonymised.

8. HOW WE KEEP YOUR DATA SAFE

We use the following measures to protect your personal data:

- Access controls — only staff who need your data for their job can see it.
- Encryption — sensitive data is encrypted when sent electronically.
- Locked storage — sensitive paper records are kept in locked cabinets or safes.
- Staff training — all staff who handle personal data are trained on data protection.
- Data Processing Agreements — all third parties handling your data are contractually bound to protect it.
- Secure destruction — paper records are shredded; digital records are permanently deleted.

9. YOUR RIGHTS

Under the Cyber and Data Protection Act, you have the following rights. We will respond within 30 days of receiving your request.

Your Right	What It Means
Know	Be told what data we hold about you and why.
Access	Ask for a copy of your personal data. We respond within 30 days.
Correct	Ask us to fix data that is wrong or out of date.
Delete	Ask us to erase your data where there is no longer a reason to keep it.
Object	Tell us to stop using your data, including for marketing.
Withdraw consent	Change your mind at any time where we asked for your consent.

To exercise any of these rights, contact our DPO:

Email: nsibanda@alliedtimbers.co.zw

Subject line: 'Data Request – [Your Name] – [What You Need]'

Post: Data Protection Officer, Allied Timbers Zimbabwe, 125A Borgward Road, Msasa, Harare

We will acknowledge your request within 5 working days.

10. IF SOMETHING GOES WRONG

If there is a breach that puts your personal data at risk, we will tell you and report it to POTRAZ as required by law. If you think your data has been compromised, please contact our DPO immediately at nsibanda@alliedtimbers.co.zw with the subject line 'DATA BREACH – URGENT'.

11. UPDATES TO THIS NOTICE

We will update this notice at least once a year, or sooner if our data practices change. The latest version will always be available from our DPO and on our website at www.alliedtimbers.co.zw.

12. HOW TO COMPLAIN

If you are unhappy with how we have handled your data, please contact our DPO first — we would like the chance to put things right. If you are still not satisfied, you can complain to POTRAZ:

POTRAZ — Postal and Telecommunications Regulatory Authority of Zimbabwe

Website: www.potraz.gov.zw

Address: 1008 Performance Close / Mt Pleasant Business Park, Harare, Zimbabwe

This Privacy Notice is issued under Allied Timbers Zimbabwe Data Protection Policy and is governed by the Cyber and Data Protection Act [Chapter 12:07] (Act 5 of 2021) and Statutory Instrument 155 of 2024.