



Universal

ZIMBABWE LEAF TOBACCO COMPANY (PRIVATE) LIMITED

Data Protection Processing Notice

This notice is provided by Zimbabwe Leaf Tobacco Company (Private) Limited, registered at 1 Foundry Road, Aspindale Park, Harare, acting as the data controller. Our Data Protection Officer can be contacted on nyabads1@universalleaf.com

Purpose of Data Processing

We process your personal data for various purposes, depending on the nature of the arrangement, contract or legitimate interests of the company. The list of purposes includes but is not limited to the following (a) to perform legitimate business objectives (b) due diligence (c) employment or potential employment (d) supplier and services provider contracting (e) marketing and research (f) security purposes (g) compliance with laws and policies (h) contractual requirements (i) review and monitoring of sustainability practices (j) medical reasons (k) risk assessments (l) training and educational development (m) communication (n) corporate transactions etc.

The legal bases for this processing are: consent; contract; legal obligation; vital interests; public task; or legitimate interests.

Categories of Personal Data

We collect and process various types of personal data including the following in relation to a data subject: (a) name, address or telephone number; (b) race, national or ethnic origin, colour, religious or political beliefs or associations; (c) age, sex, gender, marital status or family status; (d) an identifying number, symbol or other particulars assigned to that person; (e) fingerprints, facial, blood type or inheritable characteristics; (f) information about a person's health care history, including a physical or mental disability; (g) information about educational, financial, criminal or employment history; (h) opinions expressed about an identifiable person; (i) the individual's personal views or opinions, except if they are about someone else; (j) personal correspondence pertaining to home and family life etc.

Data Sources

We collect personal data from you, as well as from third parties and processors who facilitate, process, or complete transactions for us, such as service providers, credit bureaus, employment agents or other agents and partners.

Data Recipients

Your personal data may be shared with third-party vendors, service providers, contractors, associated or affiliate group companies or agents ("third parties") who perform services for us or on our behalf and require access to such information to do that work.

We also may need to share your personal information in the event of a business transfer, merger or acquisition. We may share your information with our business partners to offer you certain products, services, or promotions.

Your data may be transferred internationally to South Africa, Brazil, United States of America, or Switzerland or any other jurisdictions notified to POTRAZ from time to time.

Data Retention

We will only keep your personal information for as long as it is necessary for the purposes set out in this privacy notice, unless a longer retention period is required or permitted by law (such as tax, accounting, or other legal requirements).

Your Rights

You have the right to:

- Access your personal data,
- Request rectification of inaccurate data,
- Request erasure of your data ('right to be forgotten'),
- Restrict processing of your data,
- Object to processing,
- Not to be subject to automated decision-making, including profiling.

To exercise these rights, please contact our Data Protection Officer at nyabads1@universalleaf.com

Withdrawal of Consent

Where processing is based on consent, you have the right to withdraw this consent at any time by contacting our Data Protection Officer directly.

Complaints

You have the right to lodge a complaint with the Data Protection Unit at POTRAZ if you believe your data has been processed unlawfully.

The relevant contact details are as follows: 1008 Performance Close, Mount Pleasant Business Park, Mount Pleasant, Harare. Telephone +263 242 333032.

Further Processing

We may process your data for additional purposes not mentioned here if they are compatible with the original purpose. We will inform you of any such processing and provide any relevant additional information upon enquiry.

This notice was last updated on 20 January 2026.