







## **BROADBAND SYSTEMS CORPORATION**

### **WEBSITE PRIVACY & COOKIE POLICY**

**Version 1.0**


	<b>DOCUMENT NUMBER:</b> BSC-PIMS-PO-Website Privacy & Cookie Policy-v1.0	<b>REVISION:</b> 1.0
	<b>SUBJECT:</b> WEBSITE PRIVACY & COOKIE POLICY	

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	Innocent Ruzindana	CTO		18/08/2023
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## 1. Our Data Protection and Privacy

Data Protection and Privacy matters to us and we know it matters to you. We are committed to protecting your privacy, keeping your information safe and ensuring the security of your personal information. To provide you with the most effective products and services, your personal information will be collected, processed lawfully, stored securely and not disclosed unlawfully to any third party. We are committed to protecting your privacy and preserving the confidentiality of your personal information that you provide to us.

The data protection laws in scope is the Rwanda’s Law N° 058/2021 of 13/10/2021 relating to the protection of personal data and privacy (DPP Law), and other international laws on personal data and privacy such as the GDPR.


## 2. Who does this Statement applies to?

This Statement applies to:

- a. All Customers and/or users who are natural persons or living individuals; and
- b. All Customers and/or users who are organizations.
- c. All BSC employees and job applicants or prospective employees.
- d. All BSC suppliers, partners, and service providers.

### 2.1 What Personal Information does BSC collect and use?

- Personal information collected and held by us may include but not limited to; name, sex, date of birth, addresses, International Mobile Equipment Identity, mobile phone number, email address, occupation and information contained in supporting documents such as proof of identity and proof of address.
- BSC and its authorized third parties may collect, store, process the following types of Personal Information:
  - Biometric Data
  - Racial or Ethnic Origin
  - financial information
  - for providing our products, services and

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- for use of our website

Information related to your utilization of our services which may include your browsing history on our website, location details and additional information provided while using our services.

## 2.2 BSC will rely on the following to process your personal data

- **Legal Obligation**

In some circumstances, where the processing of the personal data is necessary for the performance of an obligation conferred or imposed by law on BSC, we will rely on Legal Obligation as a basis to process the personal information you have provided.

- **Legitimate Interest**

Our legitimate business interests, for example, direct marketing and improvement of our services. Whenever we rely on this lawful basis to process your data, we assess our business interests to make sure they do not override your rights. Additionally, in some cases you have the right to object to this process. See “Your Rights” section of the statement.


- **Consent**

We may rely on the consent you provide in the absence of any other legal basis. Consent will always be presented separately to you, can be withdrawn at any time and you will be given details on how to do so.

- We rely on contract as a legal basis to process your personal information when we need to deliver a contractual service to you or when it has become necessary to process data before entering into a contract with you.

## 2.3 Purpose of collecting personal information


- BSC collects your personal information for a variety of business purposes. These include, but are not limited to:
  - Verifying your identity;
  - Completing transactions effectively and billing for products and services;
  - Responding to your request for service or assistance;

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- Performing market analysis and research as well as business and operational analysis;
- Providing, maintaining and improving our products and services.
- Anticipating and resolving issues and concerns related to our products and services.
- Promoting and marketing our products and services which may benefit you and be related to products and services you are currently enjoying; and
- Ensuring adherence to legal and regulatory requirements for prevention and detection of fraud and crime.
- BSC may keep a log of the activities performed by you on our network and websites by using various internet techniques such as web cookies, web beacons, server log files, etc. for analytical purposes, for analysis of the agreeableness of various features on our site and in accordance with requisite legal requirements. This information may be used to provide you with a better experience on our platforms.
- At any time while you are browsing our site, if you do not wish to share browsing information, you may opt out of receiving the cookies from our site by making appropriate changes to your browser privacy settings.
- If you do not provide your consent for usage of personal information or later withdraw your consent for use of the personal information so collected, BSC will not be able to provide certain products and services to you.

### 3. Disclosure and Transfer of Personal Information

- **Collection of Personal Information:** BSC will obtain your consent for sharing your personal information in several ways, such as in writing, online, through “click-through” agreements; orally, including through interactive voice response; or when your consent is part of the terms and conditions which apply to our products and services.
- **Internal Use:** BSC and its employees may utilize some or all available personal information for legitimate business purposes and related activities within the parameters mentioned above.
- **Third Parties:** We may have to share your personal information with third parties, including third-party service providers, sub-contractors, other entities within BSC. A ‘Third Party’ is a service provider who is contracted by BSC to provide a service or product

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which may include the handling, managing, storing, processing, protecting, and transmitting information of and for BSC. This includes all subcontractors, consultants and/or representatives of the Third party. We require third parties to respect the security of your data and to treat it in accordance with applicable laws.

- **Government and Law Enforcement Agencies:** We may also share your personal information with Government agencies or other authorized Law Enforcement Agencies (LEAs) mandated under law to obtain such information for the purpose of verification of identity or for prevention, detection, investigation including but not limited to cyber incidents, the investigation and prosecution of crime, and as is required by law.
- **Transfer:** BSC may transfer your personal information or other information, or data collected, stored, processed by us to any other entity or third party located outside the country of service, only, if necessary, for legitimate business purposes for providing services to you. This may also include sharing aggregated information with third parties contracted to BSC for them to understand our environment and consequently, provide you with better services. While sharing your personal information with third parties, reasonable organizational, technical and security measures shall be taken to ensure that reasonable security practices are followed by the third party and are in line with the Data Protection Act.

#### 4. Use of Cookies

Cookies are a kind of short-term memory for the web. They are stored in your browser and enable a site to ‘remember’ little bits of information between pages or visits. Cookies are used by web servers to identify and track your activities as you navigate the different pages of our website, and to identify you whenever you return website, allowing the website to provide you with a personalized browsing experience and BSC with statistics about how you use the website so that it can be improved.

Cookies may be either “persistent” cookies or “session” cookies. A persistent cookie consists of a text file sent by a web server to a web browser, which will be stored by the browser and will remain valid until its set expiry date (unless deleted by the user before the expiry date). A session cookie, on the other hand, will expire at the end of the user session, when the web browser is closed.

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#### 4.1 Cookies on Our Website

We use both SESSION COOKIES (which expire once you close your web browser) and PERSISTENT COOKIES (which stay on your device until you delete them).

We have also grouped our cookies into the following categories, to make it easier for you to understand why we need them:

- a) **Functionality:** These cookies enable the technical performance of our websites and allow us to ‘remember’ the choices you make and your preferences
- b) **Performance:** These cookies allow us to collect certain information about how you navigate the sites. They help us to understand which parts of our websites are interesting to you and which are not as well as what we can do to improve them.

These cookies are placed by software that operates on our servers, and by software operated by third parties whose services we use.


If you choose not to use cookies or you prevent their use through your browser settings, you will still be able to use all the functionality of our website.

#### 4.2 How We Use Cookies

Cookies do not contain any information that personally identifies you, but personal information that we store about you may be linked, by us, to the information stored in and obtained from cookies. The cookies used on this website include those which are strictly necessary cookies for access and navigation, cookies that track usage (performance cookies) and remember your choices (functionality cookies). We may use the information we obtain from your use of our cookies for the following purposes:

- To recognize your computer when you visit our website.
- To keep you signed in on our site.
- To track how you use our website as you navigate our website.
- In the administration of our website to improve the website’s usability.
- To record whether you have seen specific messages we display on our website.
- To record your answers to queries and questionnaires on our site while you complete them.



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### 4.3 Third-Party Cookies

In some special cases, we also use cookies provided by trusted third parties to help us understand how you use the site and ways that we can improve your experience. These cookies may track things such as how long you spend on the site and the pages that you visit so we can continue to produce engaging content.


We also use social media buttons and YouTube plugins on this site, which will set cookies through our site that may be used to enhance your profile on their platforms or contribute to the data they hold for various purposes outlined in their respective privacy policies.

### 4.4 Disabling Cookies

You can prevent the setting of cookies by adjusting the settings on your browser (see your browser Help for how to do this). Be aware that disabling cookies may affect the functionality of this and many other websites that you visit. Disabling cookies may also result in disabling certain functionality of this site. Therefore, it is recommended that you do not disable cookies.

## 5. Security Practices and Procedures

- BSC adopts reasonable security practices and procedures, in line with international standards to include technical, and organizational security safeguards to protect your personal information from unauthorized access, or disclosure while it is under our control.
- Our security practices and procedures are within industry standards. Further, our employees and service providers / partners are bound by Codes of Conduct and Confidentiality Policies which require them to protect the confidentiality of personal information they access.
- We may retain your personal information for as long as required to provide you with products and services or as otherwise required under any law.
- When we dispose of your personal information, we use reasonable procedures to erase it or render it unreadable/anonymized.
- Internet Use – We maintain the security of our internet connections and observe reasonable security measures to protect your personal information against hacking and virus dissemination. However, for reasons outside of our control, security risks may still arise.

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- Storage: How do we keep your information?
- We may store your information in hard copy or electronic format and keep it in storage facilities that we own and operate ourselves, or that are owned and operated by our Third parties/ service providers.
- We use a combination of technical solutions, security controls and internal processes to help us protect your information and our network from unauthorized access and disclosure.
- Accuracy: We endeavour to ensure that personal information is accurate and encourage you to update your personal information in our possession and when it changes by contacting us on the information provided below.

## 6. Your Rights

- **Right to access personal information**

You have the right to make a request for a copy of the personal information that BSC holds about you (including advertising audience categories and inferred information) as permitted by law.

- **Right to correct personal information**


You have the right to correct information held about you to ensure it is accurate, relevant, complete, and not excessive.

- **Right to object to use of personal information**

You have the right to object to BSC processing your personal information in certain circumstances as permitted by law. However, in instances where the basis for processing is Legal Obligation, you may not be able exercise your right to object.

- **Right to opt-out of marketing messages**

BSC will not issue targeted marketing to you unless you consent for us to do so. If you no longer want to receive marketing messages from BSC, you can choose to opt out at any time using the means made available to you. If you have previously opted in to receive personalized content based on how and where you use our network, you can also opt out at any time.

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**7. Contact- How to exercise any of above-mentioned Rights**

If you have any queries in any aspect of this privacy statement or if you would want to exercise any of the rights mentioned above, please send an email to BSC at ..... and our privacy team will respond to you.

**8. Changes to policy**

We reserve the right to modify this Data Protection and Privacy Statement as and when required. We will post any changes to our Privacy Notice on our website: [<https://bsc.rw>]. We encourage you to check frequently to see the current Data Protection and Privacy Statement to be informed of how BSC is committed to protecting your information and providing you with improved content on our site in order to enhance your experience.