

---

**PRIVACY NOTICE**

---

**BACKGROUND:**

Mauritius Oil Refineries Ltd (“**MOROIL**” or “**we/us**”) understands that your privacy is important to you and that you care about how your personal data is used. MOROIL respects and values the privacy of all of its employees, customers, suppliers and stakeholders and will only collect and use personal data in ways that are described here, and in a way that is consistent with MOROIL’s obligations and your rights under the law.

**1. Information About Us**

Mauritius Oil Refineries Ltd, a public listed company, is registered in Mauritius under the Business Registration Number C09001521. Our registered address is Quay Road, Port Louis, Mauritius.

MOROIL’s core business is the refining and marketing of edible oil. Besides the selling of crude oil and its by-products, the marketing of a selected range of quality food products; the administrative and investment operations form part of the other business activities of the Company.

The Data Protection Officer is Mr. Lynden Lareine.

More information is available on the company on our website [www.moroil.mu](http://www.moroil.mu)

**2. What Does This Notice Cover?**

This Privacy Information explains how MOROIL uses your personal data: how it is collected, how it is held, and how it is processed. It also explains your rights under the law relating to your personal data.

**3. What Is Personal Data?**

Personal data is defined by the Data Protection Act 2017 (“the Law”) as any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier.

Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

The personal data that MOROIL uses is set out in Part 5, below.

**4. What Are My Rights?**

Under the Law, you have the following rights, which MOROIL will always work to uphold:

- a) The right to be informed about MOROIL’s collection and use of your personal data. This Privacy Notice should tell you everything you need to know, but you can always contact us to find out more or to ask any questions using the details

## MAURITIUS OIL REFINERIES LTD

in Part 11.

- b) The right to access the personal data MOROIL holds about you. Part 10 will tell you how to do this.
- c) The right to have your personal data rectified if any of your personal data held by MOROIL is inaccurate or incomplete.
- d) The right to be forgotten, i.e. the right to ask MOROIL to delete or otherwise dispose of any of your personal data that MOROIL holds.
- e) The right to restrict (i.e. prevent) the processing of your personal data.
- f) The right to object to MOROIL using your personal data for a particular purpose or purposes.
- g) The right to withdraw consent. This means that, if MOROIL is relying on your consent as the legal basis for using your personal data, you are free to withdraw that consent at any time.
- h) The right to data portability. This means that, if you have provided personal data to MOROIL directly, MOROIL is using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask MOROIL for a copy of that personal data to re-use with another service or business in many cases.
- i) Rights relating to automated decision-making and profiling. MOROIL do not use your personal data in this way.

For more information about MOROIL's use of your personal data or exercising your rights as outlined above, please contact us using the details provided in Part 11.

It is important that your personal data is kept accurate and up-to-date. If any of the personal data MOROIL holds about you changes, please keep us informed as long as we have that data.

Further information about your rights can also be obtained from the Data Protection Office in Mauritius. If you have any cause for complaint about MOROIL's use of your personal data, you have the right to lodge a complaint with the Data Protection Office. MOROIL would welcome the opportunity to resolve your concerns ourselves, however, so please contact us first, using the details in Part 11.

### 5. What Personal Data Do You Collect and How?

MOROIL may collect and hold some or all of the personal and non-personal data set out in the table below, using the methods also set out in the table. MOROIL do not collect personal data relating to children.

| Data Collected   | How We Collect the Data                            |
|--|--|
| <b>Identity Information</b> including NIC, passport number, names, last names, date of birth, signatures and initials, driving license number. | Directly from employees, suppliers and consultants |

MAURITIUS OIL REFINERIES LTD

|  |   |
|--|---|
|  |   |
| <b>CCTV images</b> of employees and visitors.  | Directly from CCTV installed at MOROIL's premises   |
| <b>Contact information</b> including address, email address, phone numbers and job title.  | Directly from employees, visitors, customers, website users, suppliers or their representatives, representatives of stakeholders through emails or website contact form, social media |
| <b>Business information</b> including job category, BRN, VAT number, grade, employee code, confirmation letter, directorships, position, competencies, years of experience, Academic background, work experience, seniority in the company.  | Directly from employees, consultants and self-employed suppliers  |
| <b>Payment and tax information</b> including bank account details, bank-credit insurance (on employees, suppliers and consultants)<br><br>Salaries, fringe benefits, contract of employment, payslip, allowances and bonuses, TAN, information on dependents (name, age, relationship, spouse workplace if applicable, next of kin details) on employees only. | Directly from employees, consultants and self-employed suppliers  |
| <b>Professional information:</b> attendance, disciplinary reports, assignment history within MOROIL, appraisals, training course.  | Directly from employees via surveys, attendance records and other documents/ disclosed to MOROIL  |
| <b>Health information:</b> food preference/allergies, medical certificates, other health data to comply with health and safety measures.   | Directly from employees through employee file   |
| <b>Other sensitive information:</b> trade union membership and data relating to criminal convictions.  | Directly from employees   |
| <b>Profile information:</b> including product preferences, purchase history.   | Directly from customers through purchase history  |
| <b>Data from third parties</b> including professional references, certificate of character.  | Directly or indirectly via reference or search  |

6. **How Do You Use My Personal Data?**

Under the Law, MOROIL must always have a lawful basis for using personal data. The following table describes how MOROIL will use your personal data, and MOROIL's lawful bases for doing so:

MAURITIUS OIL REFINERIES LTD

| What We Do  | What Data We Use  | Our Lawful Basis   |
|---|---|--|
| HR administration including but not limited to payroll, payment of taxes, monitoring of staff, payment of benefits. | Identity information, CCTV images (for investigation of workplace incident), payment and tax information, contact details information, professional information, health information and other sensitive information | Performance of a contract<br>Compliance with a legal obligation<br>Legitimate interest (for data about criminal convictions and CCTV images) |
| Contracting third parties for services and products to carry out our activity                                       | Identity information, contact information, business information and payment and tax information   | Performance of a contract<br>Legitimate interest (for data about criminal convictions and CCTV images)                                       |
| Supplying our products to customers   | Contact information, payment and tax information  | Performance of a contract<br>Compliance with a legal obligation  |
| Assessing prospective customer relationships/ sending fee, quote  | Contact details   | Consent  |
| Personalising and tailoring our products  | Profile information   | Consent  |
| Communicating with you  | Contact details   | Performance of a contract or<br>Consent  |
| Supplying you with information by email that you have opted-in-to (you may opt-out at any time)                     | Contact details   | Consent.   |

With your permission and/or where permitted by law, MOROIL may also use your personal data for marketing purposes, which may include contacting you by email, telephone, text message and post with information, news, and offers on our products. You will not be sent any unlawful marketing or spam. MOROIL will always work to fully protect your rights and comply with our obligations under the Law and you will always have the opportunity to opt-out. MOROIL will always obtain your express opt-in consent before sharing your personal data with third parties for marketing purposes and you will be able to opt-out at any time.

MOROIL will only use your personal data for the purpose(s) for which it was originally collected unless MOROIL reasonably believes that another purpose is compatible with that or those original purpose(s) and need to use your personal data for that purpose.

If MOROIL needs to use your personal data for a purpose that is unrelated to, or incompatible with, the purpose(s) for which it was originally collected, we will inform

you and explain the legal basis which allows us to do so.

In some circumstances, where permitted or required by law, MOROIL may process your personal data without your knowledge or consent. This will only be done within the bounds of the Law and your rights.

**7. How Long Will You Keep My Personal Data?**

MOROIL will not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. Your personal data will therefore be kept for the following periods (or, where there is no fixed period, the following factors will be used to determine how long it is kept):

| Type of Individuals                     | Type of Data  | How Long We Keep It  |
|---|---|--|
| Employees and consultants               | Identity Information, contact information, payment and tax information, health data, professional information, sensitive data | 10 years as from the termination of the employment agreement or relationship                       |
| Representatives of stakeholders         | Contact information   | 7 years after last positive contact  |
| Suppliers                               | Identity Information, contact information, payment and tax information, business information                                  | 7 years as from the termination of the commercial relationship                                     |
| Representative of suppliers             | Contact information   | Disposed of immediately after being notified that the person does no longer represent the supplier |
| Customers                               | Identity information, contact information, business information   | 7 years as from the last transaction.  |
| Customers                               | Profile information   | 2 years as from the consent or last positive contact   |
| Prospective Customers, Website visitors | Contact information   | 2 years as from the date of consent/contact or last positive contact                               |
| Visitors                                | Contact information, ID, CCTV images  | 10 years as from the termination of the active processing  |

**8. How and Where Do You Store or Transfer My Personal Data?**

MOROIL will only store your personal data in Mauritius and within the European Economic Area (the “EEA”). The EEA consists of all EU member states, plus Norway, Iceland, and Liechtenstein. This means that your personal data will be fully protected under the EU GDPR and/or to equivalent standards by law. Transfers of personal data to the EEA from Mauritius are permitted without additional safeguards.

MOROIL will not store or transfer data outside Mauritius or the EEA.

Should MOROIL store or transfer personal data in or to other countries, the said countries must provide an adequate level of protection for personal data.

Please contact us using the details below in Part 11 for further information about the particular data protection safeguards used by MOROIL when storing or transferring your personal data to a third country.

The security of your personal data is essential to us, and to protect your data, MOROIL takes a number of important measures, including the following:

- limiting access to your personal data to those employees, agents, contractors, and other third parties with a legitimate need to know and ensuring that they are subject to duties of confidentiality; and
- procedures for dealing with data breaches (the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, your personal data) including notifying you and/or the Data Protection Office where MOROIL is legally required to do so.

**9. Do You Share My Personal Data?**

MOROIL will not share any of your personal data with any third parties for any purposes, except banks, insurance companies, our auditors and lawyers where required to do so for the performance of our activities.

In some limited circumstances, MOROIL may be legally required to share certain personal data, which might include yours, if MOROIL is involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

**10. How Can I Access My Personal Data?**

If you want to know what personal data MOROIL has about you, you can contact MOROIL for details of that personal data and for a copy of it (where any such personal data is held). This is known as a “subject access request”.

All subject access requests should be made in writing and sent to the email or postal addresses shown in Part 11. To make this as easy as possible for you, a Subject Access Request Form is available for you to use. You do not have to use this form, but it is the easiest way to tell us everything we need to know to respond to your request as quickly as possible.

There is not normally any charge for a subject access request. If your request is

'manifestly unfounded or excessive', a fee may be charged to cover our administrative costs in responding.

MOROIL will respond to your subject access request not more than one month of receiving it. Normally, MOROIL aims to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date MOROIL receives your request. You will be kept fully informed of our progress.

#### 11. **How Do I Contact You or the Regulator?**

To contact us about anything to do with your personal data and data protection, including to make a subject access request, please use the following details:

For the attention of MOROIL Data Protection Officer

Email address: [dpo@moroil.mu](mailto:dpo@moroil.mu)

Telephone number: 2069800

Postal Address: Quay Road, Port Louis, Mauritius.

If you believe that MOROIL has not complied with your data protection rights, you have the right to make a complaint to the Mauritian Data Protection Office. You can contact them to the following address:

Data Protection Office  
Level 5, SICOM Tower,  
Wall Street, Ebene Cyber City, Mauritius

Phone: +230 460 0251

Email: [dpo@govmu.org](mailto:dpo@govmu.org)

#### 12. **Changes to this Privacy Notice**

MOROIL may change this Privacy Notice as and when necessary. This may be needed, for example, if the law changes, or if we change our business in a way that affects personal data protection.

Any changes will be made available via our website and by email to our employees. This Privacy Notice was last updated on the 1<sup>st</sup> of September 2023.