



**SUPPLIER PRIVACY NOTICE**

## Table of Contents

|  |    |
|--|----|
| 1. Introduction .....                                  | 3  |
| 2. Personal Data We Collect.....                       | 3  |
| 3. Purposes of Processing.....                         | 4  |
| 4. Legal basis for Processing your Personal Data ..... | 5  |
| 5. Mandatory and Voluntary Information.....            | 5  |
| 6. Access to your Personal Data.....                   | 6  |
| 7. Personal Data Security .....                        | 6  |
| 8. Transfer of Personal Data outside Mauritius.....    | 7  |
| 9. Data Retention.....                                 | 7  |
| 10. Your Responsibilities.....                         | 8  |
| 11. Your Rights.....                                   | 8  |
| 12. Queries and Complaints .....                       | 9  |
| 13. Contact Information .....                          | 10 |
| 14. Changes to this Notice.....                        | 10 |

## 1. Introduction

- 1.1. At **Mauritius Oil Refineries Ltd** (hereafter “**Moroil**”, “we”, “us”, or “our”), we value your privacy and are committed to the protection of your personal data.
- 1.2. This Supplier Privacy Notice (hereafter, “**Notice**”) explains how we process your personal data as per the Mauritius Data Protection Act 2017 ((hereafter referred to as the “**DPA**”).
- 1.3. We recommend you read this Privacy Notice so that you understand our approach towards the processing of your personal data.

## 2. Personal Data We Collect

- 2.1. The type of personal data we collect, and process will depend on the purpose for which it is collected. We will only collect and process data that we need for that purpose.
- 2.2. We may collect your personal data in the following ways:
  - a. When it is provided in connection with your contractual relationship with us, directly from you, for example, when you provide of offer to provide services, you correspond with us and provide us with your information, through quotations, letters of intent or agreements.
  - b. When you attend our events (for e.g. through pictures taken during promotional events)
  - c. Through technologies for instance via closed-circuit televisions (“CCTV”).
- 2.3. The types of personal data that we process are detailed below:

| Categories of Personal Data | Details   |
|-----------------------------|---|
| Contact Details             | Name, Email address, Telephone number, Mobile number, Address |
| Individual Details          | Photograph/ Video   |

|                        |   |
|------------------------|---|
| Identification Details | National Identity Card Number, Passport number, BRN |
| Financial Information  | Bank Account details, VAT number                    |
| Video Surveillance     | CCTV Footage  |
| Other                  | Signature on contractual agreements                 |

### 3. Purposes of Processing

- 3.1. **Moroil** will only use your personal data for the purposes for which it was collected or agreed with you.
- 3.2. We will not use your personal data for any automated individual decision making which will have a significant impact on you.
- 3.3. We process your personal data for the following purposes:
  - Vendor Management (registration for local vendors, international vendors, vendor appraisal)
  - Sourcing of goods and services (selection and qualification process of suppliers);
  - For payment purposes;
  - Investigation purposes for breach of contract;
  - Managing hazardous situations;
  - Publication of photographs or videos containing your appearance, further to events organized by **Moroil**;
  - Contract management; and
  - Record Keeping
- 3.4. In addition to the above-mentioned specific purposes, we may also process any of your personal data where such processing is necessary for compliance with legal and regulatory

requirements which apply to us, when it is otherwise allowed by law, or when it is in connection with legal proceedings.

#### **4. Legal basis for Processing your Personal Data**

4.1. **Moroil** processes your personal data based on one or more of the following legal bases:

- Contractual Necessity: Processing is necessary for the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract.
- Legal Obligations: Processing is necessary to comply with our legal obligations.
- Legitimate interests: Processing is necessary for our legitimate interests or the legitimate interests of a third party provided that such interests are not overridden by your rights and interests.
- Vital interests: Processing is necessary in order to protect your vital interests.
- Consent: Processing is based on your explicit consent which you can withdraw at any time.

4.2. **Moroil** adheres to provisions stipulated in the **DPA** and processes special categories personal data on the following grounds, where:

- The processing is based on your consent;
- The processing is necessary for the establishment, exercise or defence of a legal claim;
- The purpose of carrying out the obligations and exercising specific rights of the controller or of the data subject.

#### **5. Mandatory and Voluntary Information**

5.1. To ensure compliance with legal obligations, certain information is mandatory for you to provide. This mandatory information includes but is not limited to, your name, contact information and banking details. Failure to provide this mandatory information may impact your contractual relationship with us.

5.2. If you choose to provide more information beyond what is required, we will evaluate its necessity for our purposes. If it is determined to be unnecessary, we will promptly delete it to ensure the protection of your privacy.

## **6. Access to your Personal Data**

### **6.1. Access to your personal data within Moroil**

6.1.1. Our employees who may have access to your personal data are required to keep that data confidential.

### **6.2. Access to your Personal Data by third parties**

6.2.1. We treat your personal data as confidential and will not disclose it to third parties, except when such disclosure is justified by a legitimate legal basis or is necessary for compliance with legal or regulatory requirements or where consent was provided. We prioritise the confidentiality and protection of your personal data in line with the **DPA**.

6.2.2. We may share your personal data with third-party service providers on a need-to-know basis and under clear contractual terms and instructions for the processing of your personal data.

- Law enforcement agencies such as the Mauritius Police Force.
- Ministries, Government departments and public sector agencies where such exchange is required on a need-to-know basis.

6.2.3. We require our service providers and other third parties to keep your personal data confidential and that they only use the personal data in furtherance of the specific purpose for which it was disclosed. We have agreements in place with our processors to ensure that they comply with these privacy terms.

6.2.4. Except as otherwise stated in this Notice or as required for legal or regulatory purposes, we treat your personal data as confidential and will not disclose it to third parties without your consent. We maintain and require our service providers to maintain, reasonable administrative, physical, and technical controls designed to protect the confidentiality and security of your personal data.

## **7. Personal Data Security**

7.1. We prioritise the security of your personal data and take appropriate technical and organisational measures to protect it from unauthorised access, disclosure, alteration, or destruction. We employ a combination of physical, administrative, and technological safeguards to ensure the confidentiality, integrity, and availability of your data. Here are some of the security measures we have implemented: Access controls, secure storage, incident response, and employee training amongst others.

7.2. We have also put in place procedures to deal with any suspected data security breach and will promptly notify you and the Data Protection Office of any suspected breaches where we are legally required to do so.

**8. Transfer of Personal Data outside Mauritius**

8.1. In certain circumstances, your personal data may be transferred to and processed outside Mauritius. We will ensure that any such transfer is compliant with provisions stipulated in the **DPA**. If your personal data is transferred to a country that does not provide an adequate level of data protection, we will implement appropriate safeguards, such as contractual clauses, to protect your personal data.

**9. Data Retention**

9.1. **Moroil** adheres to data retention practices that are in accordance with our business requirements and provisions stipulated in the **DPA**. Your personal data will be retained for the duration of your contractual relationship with us and for a specific period, thereafter, as mandated by relevant domestic laws.

9.2. We will retain your personal data only for as long as necessary for the purposes mentioned in this Notice as follows:

| Categories of personal data  | Record Type                               | Retention Period   |
|--|---|--|
| Contact Details,<br>Identification Details,<br>Individual details, | Suppliers File,<br>NIC,<br>Utility bills, | 10 years as from<br>termination of the<br>contractual relationship |

|                       |   |  |
|-----------------------|---|--|
| Financial Information | Letters of intent/<br>agreements,<br>Invoices |  |
| Individual Details    | Photographs,<br>Videos                        | 5 years as from<br>termination of the<br>contractual relationship    |
| Video Surveillance    | CCTV footage                                  | 45 – 60 days except if<br>needed for investigations,<br>police cases |

## 10. Your Responsibilities

- 10.1. You are responsible for the data you provide or make available to us, and you must ensure it is honest, truthful, accurate and not misleading in any way. Additionally, you are required to ensure that the data provided does not contain material that is obscene, defamatory, or infringing on any rights of any third party, does not contain malicious code, and is not otherwise legally actionable.
- 10.2. Further, if you provide data about other individuals, such as references, you are responsible for notifying them and obtaining their consent for us to collect and use that data in accordance with this Notice.

## 11. Your Rights

- 11.1. You have certain rights regarding your personal data as detailed below and we are committed to respecting and facilitating the exercise of these rights:
- **Right of Access:** You have the right to request access to the personal data we hold about you. This includes the right to obtain confirmation of whether we process your personal data and to receive a copy of that information.
  - **Right to Rectification:** If you believe that the personal data, we hold about you is inaccurate or incomplete, you have the right to request that we correct or update it.



- **Right to Erasure:** In certain circumstances, you may have the right to request the erasure of your personal data. This includes situations where your personal information is no longer necessary for the purposes for which it was collected, or you withdraw your consent and there is no other legal basis for processing.
- **Right to Restriction of Processing:** You have the right to request the restriction of the processing of your personal data under certain conditions. This means we will temporarily suspend the processing of your personal data, such as when you contest its accuracy or when you object to the processing.
- **Right to Data Portability:** You may have the right to request a copy of your personal information in a structured, commonly used, and machine-readable format. You also have the right to transmit this data to another data controller.
- **Right to Object:** You have the right to object to the processing of your personal data for certain reasons, such as direct marketing or legitimate interests. If you exercise this right, we will no longer process your personal data unless we can demonstrate compelling legitimate grounds that override your interests, rights, and freedoms.
- **Right to Withdraw Consent:** If we rely on your consent as the legal basis for processing your personal data, you have the right to withdraw your consent at any time. This will not affect the lawfulness of processing based on consent before its withdrawal.

11.2. To exercise your right as a data subject, you are requested to fill out the Data Subject Right Request Form, available on our website or send an email to the **DPO**.

11.3. You are asked to send your request with all required information, including:

- The request type – For example, are you requesting a copy of your information, the deletion or modification of your personal data; and
- All relevant information which can help to successfully respond to your request.

## 12. Queries and Complaints

12.1. If you have questions or concerns about your personal data processing or wish to exercise your rights, please contact our **DPO** as detailed in Point 13. When reaching out, provide a clear and detailed description of your concerns to facilitate our understanding and prompt action.

12.2. The **DPO** will acknowledge receipt, investigate, and aim to respond within a specified timeframe, typically within one month, with any necessary extensions communicated.

12.3. If you are dissatisfied with our response, you have the option to complain to the Data Protection Office.

### **13. Contact Information**

13.1. For inquiries or to exercise your data protection rights, please contact our **DPO** as follows:

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

Telephone Number: 206 9800

Address: Quay Road, Port Louis, Mauritius

### **14. Changes to this Notice**

14.1. We may update this Notice from time to time to reflect best practices in data management, security, and control and to ensure compliance with any changes or amendments made to the **DPA** and any laws or regulations thereof.