

## PRIVACY STATEMENT

#### INTRODUCTION

Version Last Updated

Margins ID Group Limited "referred to as the company", regards the privacy of the public. It is for this purpose that we have this Privacy statement and "Terms of use" on our websites which set out all of Margins ID Group's personal data protection practices.

**Personal Data** is that information which either in itself or together with additional information available to the company, identifies a specific individual. Examples are Name, Telephone number, staff ID etc.

## What Personal Data Does Margins ID Group Collect and How we collect it?

#### Data Provided by you.

We collect that personal data which you provide to us during usage of any of our services or products. This ranges from data provided by you during request for product and service information, registration information for newsletter subscription, participation in surveys and discussions either in person or through our websites and when you interact with us through our social media Pages.

Also, we collect personal data which you provide when you contact us via telephone, or during our sales and marketing activities, and business-related events (which may be hosted by the company or a third-party company).

The information you provide, may include your location, name, email address, job title, financial/credit information etc.

#### **Your Consent**

We assure you that we shall not process your data without your prior consent unless it is necessary for the purpose of a contract to which you are a party.

#### Information we collect

When you visit our websites, we may use cookies and similar technologies to collect information related to your visit. These typically includes your location, IP address, the identity of your Internet Service Provider, the name and version of your operating system, the name and version of your browser, the date and time of your visit, and the pages you visit.



We collect information relating to the access, usage, and performance of our websites. This information is collected and stored in electronic records called logs. These logs may record the names, usernames, manner of access, time of access and location of access of those who have visited our websites.

## Information third parties provide to us

There are instances through which we may receive an individual's personal data from a third-party source. In the case that the company's products and services are recommended through a sister company's website, data (such as location and IP Address) on persons who viewed adverts or products news, will be provided for analytics and marketing purposes indirectly.

The uses for which an individual's data is collected include the following:

For content improvement and website functionality purposes.

- To aid provision of effective customer service.
- For conduct of product research and service development
- To present new products and service which may be of interest to existing customers through marketing and advertisement.
- To collate and analyze customer feedback on product and service quality through conduct of opinion polls and surveys.
- To investigate and prevent fraudulent activity or unauthorized access to our websites, online products or services.
- To set up a user account and validate user license to access our websites, online products and service.
- To comply with applicable laws or regulations.
- To ensure that content from our site is presented in the most effective manner for you and for your device.

## **Does Margins ID Group Share and Disclose Personal Data?**

# Margins ID Group refrains from selling your data or sharing with any third party without your prior consent.

In the context of such processing where we may need to share your data with a third party, the recipients of all or part of your personal data will be the personnel of Margins ID Group and its subsidiary companies.

We may also share your data with third parties in charge of the hosting and maintenance of the Website purposely, to improve on the services they provide for us on our websites and enhance your experience. We take appropriate measures to verify that all third parties with whom your data may be shared are compliant with the GDPR and the Data Protection Act 2012 (Act 843) of Ghana.



We may disclose or transfer your personal data to Margins ID Group subsidiaries and affiliates.

We may disclose personal data to protect, enforce or defend your rights and that of others, or where the disclosure is required by law.

We may disclose personal data (in the interest of the customer) to prevent or investigate a possible crime such as fraud or identity theft, or to protect the security of our websites, products, and services.

## How Long Do We Retain Personal Data?

We only retain personal data for as long as necessary for the purpose in which it was collected.

To be precise, we retain personal data that is necessary to comply with legal obligations, resolve disputes, pursue legitimate business interests, conduct audits, and protect or enforce our rights and the public's right. A typical example is an employee's records which is kept with the company as long as they remain an employee with the company, but the data retention will no longer be necessary once the employment ceases and there are no legal implications.

## Where Do We Keep Your Personal Data and How Do We Protect It?

Since personal data can easily be misused, accessed by unauthorized persons, altered, disclosed or destroyed with authorization, Margins ID Group uses very effective technical, organizational and administrative security measures to protect your personal data from loss.

Employee data for example, is only accessed by the Human resource department in the company. This information access, granted on a need-to-know basis prevents unauthorized persons from getting classified data.

It should be noted that the security of passwords generated to give access to our website rest with you the user and comes with the responsibility of ensuring that no other person has this access. The company, however, will do its best to ensure that your personal data is safeguarded while you make use of our services although data transmission via the internet is not entirely safe.

#### International Data Transfers

The personal data that we collect from you may be transferred to and/or stored at a destination on our servers or our third-party servers that is different from the location where it was collected. It may also be processed by staff who work for us or for one of our suppliers in a location different from where the data was collected. We will only transfer your personal data as permitted by Data Protection laws. Certain privacy and data protection laws require data controllers to put in place safeguards to protect personal data transferred across borders. To this, Margins ID Group has complied.

#### Who is the Data Controller?



The data controller of any personal data we hold about you is Margins ID Group Limited (MIDG).

## What Rights Do You Have with Respect to Your Personal Data?

The prevailing Data Protection Laws in the country of any of our clients, coupled with the Global Data Protection Regulation requirements, will be the grounds on which the rights of the subject can be enforced. A data subject enjoys the following.

Right to ask us for information relating to personal data about you which we control and process,

Right to delete, amend, request for update, cease all active processing of an individual's data and retrieval of all or any portion of one's data in a structured and readable format.

The data subject can also object to the processing of his or her personal data in some circumstances (e.g., where we don't have to process the information to meet a legitimate interest, contractual or other legal requirement) however, one's right to object to processing of their personal data may be limited in certain circumstances where we are required by law to keep the data for the purposes of fraud prevention.

An account may not necessarily have to be created; however, additional information may be required to enable the assessment of the scope of the request being made and verify the identity of the individual making the said request.

If we have collected and processed your personal data with your consent, then you can withdraw your consent at any time by contacting us through <a href="mailto:DPS@Margins.com">DPS@Margins.com</a>. It should be noted that the withdrawal of consent does not affect the lawfulness of all processing that was done prior to this withdrawal.

Our promotional materials for marketing purposes may also be sent via the details you provide such as email addresses. To opt out of receiving these marketing content from Margins Group, you can use the opt out button.

## Children's Privacy

We do not knowingly collect personal data on individuals under 18 years of age. Our websites, products and services are intended for users above 18 years of age.

#### **Amendments to this Privacy Statement**

We reserve the right to amend this Privacy Statement from time to time as our business, laws, regulations and industry standards evolve. Any changes are effective immediately following the posting of such changes on https://marginsgroup.com We encourage you to review this statement from time to time to stay informed.

#### **Contact Us**



Contact our Data Protection Supervisor on: dps@marginsgroup.com

The DPS is responsible for overseeing all queries relating to this Privacy Policy and all relevant Data Protection queries. If you have any queries, please do not hesitate to contact us.

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