



## **ICEcash Privacy Notice**

18/11/25

## Introduction

ICEcash (Pvt) Ltd, here referred to as ICEcash values your privacy. We, therefore, collect, process, and secure your personal information in line with the Cyber and Data Protection Act (Chapter 12:07) of Zimbabwe. This privacy notice explains how we process and protect your personal information collected using our mobile application, online banking application, website, and any of our various support channels.

## Data Collected

ICEcash collects the following data, which is primarily used to facilitate seamless service delivery.

### Collected Personal Data Types:

- **Identity data:** Name, ID number, Passport Number
- **Contact data:** Address, email, phone number
- **Financial data:** Bank account details, transaction history, credit card information
- **Travel data:** Toll passage history
- **Vehicle insurance data:** vehicle ownership record, vehicle policy, vehicle, and radio licenses
- **Device and usage data:** IP address, device ID, app usage patterns
- **KYC information:** National ID, passport, proof of address, company ownership record

## Data collection methods

ICEcash collects personal data it processes from the following sources:

- **Directly from you:** via the registration forms (physical or online), on call or emails
- **Automatically:** via the online applications, website interactions,
- **From third parties:** via integrated vehicle registration systems, insurance companies

## Data Utilisation

The data processed by ICEcash is based on any of the following lawful basis,

1. ICEcash' s **Legitimate interest** to know client and provide seamless service.
2. **Legal obligations** as required by the laws governing the services we offer.
3. **Consent** given by you.
4. **Contractual obligations** between ICEcash and its Partners or with you.

Data Type	Example	Purpose	Lawful Basis
Identity and Contact data	Name, ID number, Phone number	Account Registration and service provision	Contractual
KYC data	ID, Passport, Proof of Residence	To verify identity	Legal obligation
Device and usage data	IP address, Device ID, Location	To identify user and prevent fraudulent activities	Legitimate interest
Financial data	Transaction details, debit card usage	To facilitate financial transactions	Legal obligation /Contractual

Vehicle insurance data	Vehicle registration number, vehicle owner identity and contact details	To generate policy number linked to beneficiary	Legitimate interest/ Contractual
Contact data	Email address, phone number	To advise on new product offerings	Consent

## Data Sharing

As ICEcash we may share your information with our business partners who are directly involved with the services we provide and other third parties as legally required.

1. Sponsor banks who hold your funds (CBZ and NMB)
2. Payment processors such as Zimswitch, Partner banks
3. Regulatory authorities such as RBZ and POTRAZ
4. IT and cloud service providers such as Microsoft
5. ICEcash project partners such as ICZ, Motor Vehicle Insurers, ZINARA, Instatoll
6. Law enforcement (where required), i.e. the ZRP and Zimbabwean Courts

All third parties are bound by agreements to process your data securely and lawfully.

## Cross-Border Data Transfers

ICEcash transfers data to countries with adequate protection standards. Your data is stored on secure cloud platforms.

## Data Retention

ICEcash will retain your data for up to 10 years, and at minimum 3 months, depending on its type and purpose. Financial data is retained for longer in line with financial regulations, while your marketing contact information is disposed of sooner after the marketing campaign is completed.

## Data Protection Rights

In accordance with the Cyber and Data Protection Act, ICEcash makes necessary provisions for you to exercise your rights in relation to other governing laws.

Below is the list of your rights:

- **Right to access:** you have the right to access your information collected and processed by ICEcash.
- **Right to rectification:** you have the right to have incorrect information captured against your profile corrected.
- **Right to erasure:** you have the right to have irrelevant information about you deleted from ICEcash records (this should be in line with other ICEcash governing laws)
- **Right to object:** you have the right to give and withdraw consent.
- **Right to not be solely subjected to automated decision making** you have the right to have access to our team for assistance and not deal solely with our automated channels.

To exercise your rights please contact our Customer Support Team on 08677004010 or service dedicated emails available on our website.

## Data Security

ICEcash employs both technical and organizational measures to protect your data from unauthorized access. We encrypt your data, mask sensitive information, make use of multi-factor authentication, give role-based access to employees and third parties.

In the event of a data breach ICEcash will engage you using any of your provided contact details.

## Privacy Notice Updates

ICEcash will periodically update the privacy notice to ensure it aligns with the global changes in cyber and data protection. The updated notice will be posted on our website.

## ICEcash Contact Details

If you wish to understand more on ICEcash's Privacy Policy and data handling, please contact our Data Protection team on the following details:

Title	Data Controller	Data Protection Officer
<b>Name</b>	ICEcash Pvt Ltd	Phew Mupotaringa
<b>Address</b>	Suite K, Sam Levy's Village, Borrowdale Harare	Suite K, Sam Levy's Village, Borrowdale Harare
<b>Email Adress</b>	dpo@icecash.co.zw	phew.mupotaringa@icecash.co.zw
<b>WhatsApp</b>	-	+263 779 307 699
<b>Phone number</b>	+263 86 7700 4010	+263 86 7700 4010