

# PRIVACY POLICY Q Partnership (Zimbabwe)

Effective Date: April 2026

## 1. Introduction

Q Partnership is committed to protecting the privacy and personal data of our clients, partners, employees, and website users. This Privacy Policy explains how we collect, use, disclose, and safeguard your personal information in accordance with applicable data protection laws, including principles aligned with the Cyber and Data Protection Act Chapter 12:07(CDPA).

## 2. Scope

This Privacy Policy applies to all personal data collected by Q Partnership through:

- Our website and digital platforms
- Business engagements and partnerships
- Client engagements and service delivery
- Any other interactions with us

## 3. Definitions

- **Personal Data:** Any information relating to an identified or identifiable individual or identifiable natural person
- **Sensitive Data:** Includes data relating to health, biometric data or other protected categories under Zimbabwean law
- **Processing:** Any operation performed on personal data, including collection, storage, use, or deletion.
- **Data Subject:** The individual whose personal data is processed.
- **Data Controller:** The party who determines the purpose and means of processing personal data

## 4. Principles of Data Protection

We adhere to the principles set out in the Cyber and Data Protection Act, ensuring that personal data is:

- Processed lawfully, fairly, and transparently
- Collected for specific, explicit, and legitimate purposes
- Adequate, relevant, and not excessive
- Accurate and kept up to date
- Retained only as long as necessary
- Secured against unauthorized access or loss

## 5. Information We Collect

We may collect the following types of personal data:

- Identification information (e.g., name, ID number)
- Contact details (e.g., email address, phone number, physical address)

- Business and employment information (e.g., company name, role)
- Financial and transactional information
- Technical data (e.g., IP address, browser type, usage data)

## **6. Lawful Basis for Processing**

We process personal data only where:

- The data subject has given clear consent
- Processing is necessary for the performance of a contract
- Processing is required to comply with a legal obligation
- Processing is necessary for legitimate interests, provided such interests do not override the rights of the data subject

## **7. Purpose of Data Collection**

We collect and process personal data for the following purposes:

- To provide and manage our services
- To communicate with clients and stakeholders
- To comply with legal and regulatory obligations
- To improve our services and user experience
- To ensure security and prevent fraud

## **8. Legal Basis for Processing**

We process personal data based on:

- Consent from the data subject
- Performance of a contract
- Compliance with legal obligations
- Legitimate business interests, provided they do not override individual rights

## **9. Data Sharing and Disclosure**

We may share personal data with:

- Authorised employees and internal departments,
- Service providers and partners who assist in our operations
- Regulatory authorities such as the Postal and Telecommunications Regulatory Authority Zimbabwe (POTRAZ), where required by law
- Third party providers acting as data processors with the data subject's consent
- Other parties with the data subject's consent

**We do not sell or trade personal data.**

## **10. Data Retention**

We retain personal data only for as long as necessary to fulfil the purposes outlined in this policy, unless a longer retention period is required by law. After this period, data will be securely deleted or anonymized.

## **11. Data Security**

We implement appropriate technical and organizational measures to protect personal data against unauthorized access, loss, misuse, or alteration.

## **12. Rights of Data Subjects**

In line with CDPA principles, individuals have the right to:

- Access their personal data
- Correct inaccuracies
- Request deletion of their data
- Object to or restrict processing
- Withdraw consent at any time
- Request data portability (where applicable)

Requests can be made using the contact details below.

## **13. Cookies and Tracking Technologies**

Our website may use cookies and similar technologies to enhance user experience and analyse usage patterns. Users may control cookie preferences through their browser settings.

## **14. Breach Notification**

In the event of a data breach that poses a risk to data subjects, Q Partnership will:

- Notify the relevant authorities as required by law
- Inform affected individuals where necessary
- Take immediate steps to mitigate the breach

## **15. International Data Transfers**

Where personal data is transferred outside Zimbabwe, we ensure appropriate safeguards (such as contractual agreements) are in place to protect the data in accordance with applicable laws.

## **16. Updates to This Policy**

We may update this Privacy Policy from time to time. Changes will be posted on our website with the updated effective date.

## **17. Contact Information**

If you have questions or concerns about this Privacy Policy or our data practices, please contact:

### **Q Partnership**

[busdev@qpartnership.com](mailto:busdev@qpartnership.com)

+263 771930182

+263 772929193

## **18. Compliance Statement**

Q Partnership is committed to maintaining high standards of data protection and ensuring compliance with applicable privacy laws and internationally recognized principles, including those reflected in the Cyber and Data Protection Act (CDPA).