

Privacy Policy for Ecowater Subscribers.

Last updated: Tuesday, 23 July 2019

Ecowater International Limited headquartered in Dar es salaam, Tanzania is the controller of personal data of Ecowater Subscribers and has appointed a Data Protection Officer (privacy@ecowaterinternational.com)

The term "us" or "we" refers to the owner of "Ecowater"; Ecowater International, a private limited company, founded in the United Republic of Tanzania.

1. Personal data we process

- Name, Gender, phone number, e-mail address.
- Payment information including your prepaid water balance.
- Your daily water consumption/purchases information
- Information about complaints relating to lost cards or general service.

2. Purpose of the process

- We use contact details to notify our subscribers of our updates.
- Your name, phone number and e-mail will be used to communicate with you.
- Information about complaints is collected on a case-by-case basis and stored for the purpose of resolving disputes and service quality issues.
- We will also use your e-mail address and/ or phone number to send direct marketing messages.
- We use your water consumption and purchases information to compute your impact reports.
- We use your payment information to process financial reports and for other accounting purposes as required by law.

3. Legal Basis

- Personal data is processed in order to provide the service contracted with subscribers. We collect and processes the personal data submitted by the subscribers in the course of subscribing and use of Ecowater. The prerequisite for the use of Ecowater is subscribers agreeing to the processing of their identification and personal data.
- Personal data may be also processed on legitimate interest grounds, for example in investigating and detecting fraudulent payments if any.

4. Recipients

- We may share information as discussed below, but we won't sell it to advertisers or other third-parties.

- Depending on the location of the Subscriber, the personal data is only disclosed to Ecowater International Limited and partners (local subsidiaries, representatives, affiliates, agents etc). Processing of personal data by Ecowater International Limited and partners will occur under the same conditions as established in this privacy notice.
- **Others working for Ecowater.** Ecowater uses certain trusted third parties to help us provide, improve, protect, and promote our Services. These third parties will access your information only to perform tasks on our behalf.
- **General Public.** If you submit content in a public forum, such as blog comments, social media posts, or other features of our Services that are viewable by the general public, we may share that content with the general public.
- **Law & Order.** We may disclose your information to third parties if we determine that such disclosure is reasonably necessary to (a) comply with the law; (b) protect any person from death or serious bodily injury; (c) prevent fraud or abuse of Ecowater or our users; or (d) protect Ecowater's property rights.

5. Security and access

- Any personal data collected in the course of providing the services is transferred to and stored in the servers of Ecowater International Limited hosted in Amazon Web Services, Inc. Only authorised employees of Ecowater International Limited and partners have access to the personal data and they may access the data only for the purpose of processing day to day services and resolving issues associated with the use of the services.
- Ecowater International Limited and partners can access personal data to the extent necessary to provide customer support.
- For research and scientific purposes, the data is used in unidentified form (anonymized)

6. Access, correction and Changes

- You can access and update your personal data upon request.
- If we are involved in a reorganization, merger, acquisition or sale of our assets, your information may be transferred as part of that deal. We will notify you (for example, via a message to the email address associated with your account) of any such deal and outline your choices in that event.
- We may revise this Privacy Policy from time to time, and will post the most current version on our website. If a revision meaningfully reduces your rights, we will notify you.

7. Retention

- Your personal data will be stored as long as you have an active account. If your account is closed, personal data will be deleted (according to the policies set out in this section) from the databases, unless such data is required to be retained for accounting, dispute resolution or fraud prevention purposes.
- Financial data regarding water services provided to Subscribers will be stored for 3 years after their last refill.
- Data required for accounting purposes will be stored for 7 years [after the last refill].

- In the event that there are suspicions of a criminal offence, fraud or false information having been provided, the data will be stored for 10 years.
- In case of payment disputes, data will be retained until the claim is satisfied or the expiry date of such claims.
- Refill history data will be stored for 3 years, after which the data will be anonymized.
- Please note that the renewal of your Ecowater card does not cause the deletion of your personal data.
- If the account has not been used for 3 months, we will notify you and ask you to confirm whether account is still active. If no reply is received within 3months, the account will be closed and personal data will be deleted unless such data is required to be stored for accounting, dispute resolution or fraud prevention purposes.

8. Deletion

- You should also bear in mind that any request to delete your personal data is possible only if we delete your account. As a result of that you will not be able to use Ecowater via an account which has been deleted.
- We respond to any request to delete personal data submitted by e-mail within a month and will specify the period of data deletion.

9. Portability

- We will respond to any request for transfer of personal data submitted by e-mail within a month and specify when the data transfer will take place. After we have verified the customer in question, we will provide you with your personal data, which includes: contact information and 3 years' payment/refill information.

10. Direct marketing

- We will only use your e-mail address and/ or phone number to send our direct marketing messages if you have given us permission to do so via [Ecowater](#) website. We may personalize direct marketing messages using the information of how you use our services (frequency of use, volume, payments etc.).
- If you no longer wish to receive direct marketing messages, please click the "Unsubscribe" link in the footer of our e-mails.

11. Dispute resolution

- Disputes relating to the processing of personal data are resolved through customer support (support@ecowaterinternational.com) or by contacting Ecowater's Data Protection Officer privacy@ecowaterinternational.com.