



WEBSITE PRIVACY NOTICE

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1 Introduction

- 1.1. At **Mauritius Oil Refineries Ltd** (hereafter referred to as “**Moroil**”, “we”, “us” or “our”), we are committed to safeguarding your personal data. We take your privacy seriously and strive to ensure that your personal data is processed in a lawful, fair and transparent manner.
- 1.2. This Website Privacy Notice (“Privacy Notice”) lets you know how we process your personal data in accordance with the Data Protection Act 2017 (hereafter referred to as the “**DPA**”). This Privacy Notice applies where we are acting as a data controller with respect to the personal data of our website users.
- 1.3. **Moroil**’s website may contain links to third-party websites that are not covered by this Privacy Notice. We therefore ask you to review the privacy statements of other websites and applications to understand their information practices.
- 1.4. 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. We may collect your personal data in the following ways:
 - a. When it is **available publicly** for e.g. depending on your privacy settings for social media services, we may access information from those accounts or services (for example when you choose to interact with us through platforms such as Facebook, Instagram or LinkedIn) or on your website.
 - b. When you attend our events (for e.g. through pictures taken during promotional events)
 - c. When you browse and/or interact on **our website**.
- 2.2. The types of personal data that we process are detailed below:

Categories of personal data	Details
Contact Details	Name, Phone Number, Email address.

Individual Details	Photographs, Videos
IT and IS Information	IP Address, URL data, web analytics data, for more information, please refer to our Cookie Notice on Moroil's website

3 Purposes and Legal Basis for Processing Personal Data

3.1. We process your personal data for the following purposes and legal bases:

Purpose of processing	Legal basis of processing
<ul style="list-style-type: none"> • To analyse the use of our website and services • To provide updates and information about our services/ products through communiqués 	Legitimate interests, namely for the proper management of our business relationships with our website users.
For publishing your photographs or videos containing your appearance, further to events organised by Moroil on our Website	Consent
To ensure the security of our website and services and maintain back-ups of our database	Legitimate interests, namely the proper administration of our website and business
To confirm and verify your identity when you request to access, rectify, restrict or delete the information we hold on you	For compliance with a legal obligation to which we are subject to, that is, to verify the identity of a data subject who makes a subject rights request
To reply to any requests, complaints, comments or enquiries you submit to us regarding our services and notify you about changes to our service	Performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract; and

Purpose of processing	Legal basis of processing
	Legitimate interests namely for proper administration of our business and communication with website users.

3.2. 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, or when it is otherwise allowed by law, or when it is in connection with legal proceedings.

4 Who has access to your personal data?

4.1. Access to your personal data within Moroil

Employees who may have access to your personal data are required to keep that data confidential.

4.2. Access to your personal data by third parties

We may need to share your personal data with third parties which assist us in fulfilling our responsibilities regarding the purposes listed above. These include third parties which provide services to us such as:

a. Website Management

4.2.1. We are also required to disclose your personal data where processing is necessary for us to comply with our legal obligation, including responding to legal processes or lawful request or where:

- a. We have a duty or a right to disclose in terms of law or for national security and/or law enforcement purposes;
- b. We believe it is necessary to protect our rights;
- c. We need to protect the rights, property or personal safety of any member of the public or a customer of our company or the interests of our company; or
- d. You have given your consent.

4.2.2. 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.

5 Personal Data Security

5.1. We prioritise the security of your personal data and have adopted adequate technical and organisational security measures to protect all information by safeguarding its confidentiality, integrity and availability and to ensure business continuity and minimise operational damage by reducing the impact of security incidents. 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.

5.2. In the event there is a personal data breach at **Moroil** involving your personal data, we will handle same as per our Data Breach Response Plan to minimise the effects of the breach and ensure that the rights and freedoms of our concerned stakeholders are maintained.

6 Data Retention

6.1. We collect and process personal data for specific purposes and will retain only as long as necessary to fulfil those purposes, unless required for legitimate business or legal reasons. Generally, we will retain your personal data for a maximum of 10 years upon the termination of the business relationship between Moroil and you and specific periods mandated by domestic laws and per our Record Management Procedure, with the exception of:

- CCTV Footage: Retained for 45 – 60 days except if needed for investigations, police cases.
- Photographs/ Videos: Retained for 5 years as from the termination of the contractual relationship

7 Transfer of Personal Data outside Mauritius

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

8 Your Rights

8.1. As a data subject, you have certain rights regarding your personal data as detailed below and we are committed to 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.

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

8.3. 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.

9 Your Responsibilities

- 9.1. 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. You must 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.
- 9.2. Further, if you provide any data concerning any other person, such as individuals you provide as references, you are responsible for providing any notices and obtaining any consent necessary for us to collect and use that data as described in this notice.

10 Queries and Complaints

- 10.1. If you have any questions or concerns about your personal data processing or wish to exercise your rights, you should contact our **DPO** as detailed in Section 11. When contacting the **DPO**, you are requested to provide a clear and detailed description of your concerns. This will help us understand the issue and take the appropriate action.
- 10.2. We will investigate and attempt to resolve complaints and disputes regarding use and disclosure of your personal data in accordance with this Notice and provide you with a timely and appropriate response, typically within thirty (30) days. If additional time is required, we will inform you accordingly.
- 10.3. If you believe we have not handled your response appropriately, you may submit a complaint to the Data Protection Office in Mauritius.

11 Contact Us

- 11.1. For inquiries or to exercise your data protection rights, contact our Data Protection Officer as follows:

Email: dpo@moroil.mu

Phone Number: (+230) 206 9800

Address: Quay Road, Port Louis.

12 Changes to this Notice

- 12.1. 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. We encourage you to review this notice periodically to stay informed about how we protect and use your personal data. The latest version will be made available to you on our website.