

## **DATA PROTECTION POLICY**

### **Purpose:**

The purpose of this policy is to ensure that Ooredoo Tunisie's internal procedures for processing Personal Data complies with the following laws and regulations:

- The Constitution of the Tunisian Republic of 2022 which clearly provides that the State guarantees the respect of privacy and the protection of personal data;
- Council of Europe Convention 108 which was ratified by Tunisia through Organic Law No. 42 of May 30, 2017, approving the accession of the Tunisian Republic to Convention No. 108 of the Council of Europe for the protection of individuals with regard to the automated processing of personal data and its Additional Protocol No. 181 concerning supervisory authorities and cross-border data flows;
- Organic Law No. 63 of July 27, 2004 on the protection of personal data;
- Decree No. 3003 of November 27, 2007 specifying the operating procedures of the National Commission for the Protection of Personal Data;
- Decree No. 3004 of November 27, 2007 specifying the conditions and procedures for the declaration and authorization of the processing of personal data;
- Decision No. 3 of the INPDP of September 5, 2018 concerning the determination of States that have sufficient and adequate protection in the field of personal data protection;
- Decision No. 4 of the INPDP of September 5, 2018 concerning the processing of health data;
- Decision No. 5 of the INPDP of September 5, 2018 concerning the determination of the conditions and procedures for the installation of video surveillance systems;
- Decision No. 6 of the INPDP of July 2, 2019 concerning the control operations carried out by the National Commission for the Protection of Personal Data.

### **Scope:**

This policy applies to:

- all Personal Data that Ooredoo Tunisie e-processes or processes through a combination of electronic and traditional processing means.
- all employees, consultants, contractors and Third-Party Processors working for Ooredoo Tunisie who process Personal Data.

**Objectives:**

This Policy aims to :

- Protect the privacy and rights of individuals.
- Maintain compliance with applicable data protection laws and regulations.
- Build and maintain trust with customers and stakeholders.

**Definitions:**

the following words and expressions have the meanings hereby assigned to them, unless the context otherwise states:

Term	Definition
Consultant	An Individual or a legal person who provides professional or expert services in a particular area such as management, regulatory, finance, law, human resources, marketing, technology, or other specialized fields.
Contractor	An Individual, brought on board directly or through an external company, who provides services on a day-to-day basis and who is assigned tasks and supervised by an Ooredoo Tunisie employee.
Data Controller	A natural or legal person who, acting individually, or jointly with others, determines the method(s) of and purpose(s) for processing Personal Data.

Data Processor/Subcontractor	A natural or legal person who processes Personal Data for Ooredoo Tunisie.
Individual	A natural person whose Personal Data is being processed.
The "Instance"	The National Authority for Protection of Personal Data
Legitimate Purpose	Includes: 1- Ooredoo Tunisie's ability to process Personal Data in order to provide the services authorized under its telecommunication licenses. 2- In addition to these Legitimate Purposes, Ooredoo may process Personal Data for other purposes only after obtaining the Individual's consent; and 3- Where instructed by the competent jurisdiction.
Personal Data	Any information whatever its origin or its form allowing the identification of an individual, directly or indirectly with the exception of any information related to public life or considered public life by law.
Processing of personal data	The processing of personal data means any operation in relation to the use of such data, indexes, directories, data files or their combination.

Sensitive Personal Data	Personal Data related to the racial origin, children, health condition, physical or psychological, religion, marital relations or criminal actions, or any other Personal Data, listed in article 14 of the Law.
The Company	Ooredoo Tunisie
Third Party Processor	Any individuals or legal entities or public authority as well as their collaborators with the exception of the data subject, the recipient of a processing of personal data, the data controller, the sub-contractor as well as their collaborators. <sup>2</sup>

### Key Policy Statements:

**1. Compliance and Individual Rights:** Ooredoo Tunisie shall establish internal rules and procedures to ensure compliance with legal obligations and respect for individual rights regarding personal data processing.

**2. Data Controller and Processor Identification:** For each data processing operation, Ooredoo Tunisie shall clearly identify the Data Controller and the Data Processor.

**3. Data Security:** Ooredoo Tunisie shall implement appropriate security measures to protect personal data against loss, damage, unauthorized access, disclosure, and misuse.

**4. Data Processing Principles:** Ooredoo Tunisie shall develop and adhere to rules governing data processing that are consistent with the applicable legal framework.

**5. Consent for Data Processing:** Ooredoo Tunisie shall obtain explicit consent from individuals before processing their personal data for any purpose beyond legitimate business needs.

**6. Processing of Sensitive Data:** Ooredoo Tunisie shall obtain prior approval from the "Instance" before processing any sensitive personal data.

**7. Data Subject Information:** Before processing any personal data, Ooredoo Tunisie shall inform individuals about:

- The legitimate purposes of data processing.
- Details of any other parties involved in data processing.
- The nature and scope of data processing activities.

**8. Data Accuracy and Up-to-Date Maintenance:** Ooredoo Tunisie shall ensure that all processed personal data is accurate, complete, and kept up-to-date.

**9. Data Retention:** Ooredoo Tunisie shall retain personal data only for as long as necessary to fulfill the legitimate purposes for which it was collected, unless required by law.

**10. Data Subject Rights:** Ooredoo Tunisie shall provide individuals with electronic means to:

- Access and review their personal data.
- Withdraw consent for data processing.
- Object to data processing under specific circumstances.
- Request data deletion or correction.

**11. Internal Security Measures:** Ooredoo Tunisie shall implement and maintain appropriate internal controls and technical safeguards to protect the integrity and security of personal data.

**12. Third-Party Processor Management:** When using third-party processors, Ooredoo Tunisie's legal department shall:

- Ensure third-party processors adhere to the same data protection standards as Ooredoo Tunisie through contractual obligations.
- Conduct regular assessments of third-party processor compliance.
- Require third-party processors to notify Ooredoo Tunisie of any data breaches or security risks immediately.
- Implement contractual clauses requiring third-party processors to maintain appropriate security controls (e.g., ISO 27001).

**13. Third-Party Processor Contracts:** Contracts with third-party processors shall include provisions on:

- Ooredoo Tunisie's ownership of personal data.
- Clear liability definitions and recourse mechanisms for data breaches.
- Ooredoo Tunisie's right to audit third-party processors.

- Requirements for prior notification and approval for changes in IT service providers, subcontractors, or control.

**14. Cross-border Data Transfers:** For each cross-border flow of personal data, Ooredoo Tunisie shall obtain prior authorization from the "Instance."

**Policy Amendment and exception:**

Any changes to the provisions of this policy shall be raised by CEO to Audit and Risk Management Committee for approval and then the Board of Directors for a final approval.