



WEBSITE PRIVACY NOTICE

Table of Contents

1	Introduction.....	3
2	Personal Data We Collect	3
3	Purposes and Legal Basis for Processing Personal Data	4
4	Obligatory and Voluntary Information	6
5	Who has access to your personal data?	6
6	Personal Data Security	7
7	Data Retention.....	7
8	Transfer of Personal Data outside Mauritius	8
9	Your Rights	9
10	Your Responsibilities	10
11	Queries and Complaints	10
12	Contact Us	10
13	Changes to this Notice.....	10

1 Introduction

- 1.1 At **GS1** (hereafter referred to as “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 Mauritius Data Protection Act 2017 (hereafter referred to as the “**MDPA**”). This Privacy Notice applies where we are acting as a data controller with respect to the personal data of our website visitors, physical site visitors, customer and their representatives, prospects and suppliers.
- 1.3 **GS1**’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. Directly from you, for example when you:
 - i. Fill the Membership Application Form;
 - ii. Use any of our services;
 - iii. Provide or offer services to us.
 - b. 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.
 - 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, Address of company, Mobile Phone Number, Business Phone number, Business Fax Number, Business Email address, Postal Address
Individual Details	Gender, Nationality, Job title/Designation, Country, Preferred language, Photographs
Identification Details	National Identity Card Number, Business Registration Card, Vat Registration Certificate, Certificate of Incorporation of the Company
Financial Information	Bank Details
Video surveillance	Closed-circuit televisions (“CCTV”) footage and images
IT and IS Information	URL data, web analytics data. For more information, please refer to our Cookie Notice here .
Other	Signature, information about your business including financial information, workforce, nature of constitution line of business, amongst others, Screenshot of Payment

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
To process your barcode applications and Barcode Management	Performance of a Contract
For billing and payment purposes	Performance of a Contract
To provide training	Performance of a Contract
For assessment of project tenders and Project Consultation	Legitimate Interests namely for the selection of appropriate consultants/bidders for our projects.

Purpose of processing	Legal basis of processing
To market goods and/or services which may be of interest to you and manage your consent with regard to marketing.	Legitimate Interest for First communication with you; and Consent – For future marketing campaigns
To analyse the use of our website and services	Legitimate interests, namely for monitoring and improving our website performance and services/products offered to you; and Consent
To ensure the security of our website and services and maintain back-ups of our databases	Legitimate interests, namely the proper administration of our website and business
To manage our relationships and communicate with Customers/prospects and keep records of those communications	Legitimate interests, namely for the proper management of our business relationships with our Customers and prospects
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 Legitimate interests namely for proper administration of our business and communication with users.
Processing CCTV footage captured on our premises for protecting our premises and property and protecting your personal safety when you are on our premises	Legitimate interests of ensuring physical security and proper conduct on our premises.
For conducting market or customer satisfaction research, for statistical analysis, or for analysing the effectiveness of our advertisements	Legitimate interests, namely the proper administration of our website and business

- 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 Obligatory and Voluntary Information

- 3.3 To effectively engage in business transaction and fulfil our contractual obligations, certain information is mandatory for you to provide. This mandatory information includes but is not limited to, your name and contact information. Failure to provide this obligatory information may impact on your employment status, payroll and any compensation or benefits.
- 3.4 If you choose to provide more information beyond what is required, we will evaluate its necessity for our purposes. If it is determined to be unnecessary, we will promptly delete it to ensure the protection of your privacy.

5 Who has access to your personal data?

5.1 Access to your personal data within GS1

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

5.2 Access to your personal data by third parties

- 5.2.1 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. Management and maintenance of Customer Relation Management (CRM) Platform
 - b. Storing and Archiving purposes
 - c. Maintenance of Traceability platform
 - d. Website Management
 - e. Tax assessments
 - f. Processing payment
 - g. Auditing purposes

- 5.2.2 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.
- 5.2.3 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.

6 Personal Data Security

- 6.1 We prioritise the security of your personal data and take appropriate technical and organisational measures to protect it from unauthorised access, disclosure, alteration, or destruction. We employ a combination of physical, administrative, and technological safeguards to ensure the confidentiality, integrity, and availability of your data. Here are some of the security measures we have implemented: Access controls, secure storage and incident response amongst others.
- 6.2 In the event there is a personal data breach at **GS1** 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.

7 Data Retention

- 7.1 Where we collect and process your personal data for a specific purpose, we will not keep it for longer than is necessary to fulfil that purpose, unless we must keep it for legitimate business or legal reasons. To the extent permitted or required by law, we may delete your personal data at any time. Accordingly, you should retain your own copy of any data you submit to us. Retention periods are indicated in the table below.

Categories of Personal Data	Data Record Type	Retention period
Contact Details, Individual Identification Financial Information Details, Details,	Customer Barcode Application Form	5 years after business relationship
Contact Details, Identification Details	Cloud Platform – Barcode Management	5 years after business relationship
Contact Details, Individual Details, Identification Details, Financial Information	Cloud Platform Project Tenders, ERP, training records	5 years after business relationship
	Application Form	5 years after business relationship
	Invoices Invoices on Microsoft Dynamics 365	6 years after last transactions 2 years after last transaction
Contact Details, Individual Details	EmailingPro Platform	5 years after business relationship
Individual Details	Photographs	Unless you exercise your right withdraw your consent for publication on our platforms
Contact Details, Individual Details, Financial Information	Non-disclosure Agreement Procurement Agreement	7 years after last transaction
Video Surveillance	CCTV Images and Video recordings	30 days

8 Transfer of Personal Data outside Mauritius

8.1 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 **MDPA**. 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.

9 Your Rights

9.1 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.

9.2 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.

9.3 To exercise your right as a data subject, you are requested to fill out the Data Subject Right Request Form (DSRR), available [here](#) or send an email to the Data Protection Officer (hereafter referred to as the “DPO”).

10 Your Responsibilities

- 10.1 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.
- 10.2 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.

11 Queries and Complaints

- 11.1 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 13. 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.
- 11.2 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.
- 11.3 If you believe we have not handled your response appropriately, you may submit a complaint to the Data Protection Office in Mauritius.

12 Contact Us

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

Email: dpo@mcci.org

Phone Number: (+230) 203 4830

Address: 2nd Floor, Anglo-Mauritius House, 6, Adolphe de Plevitz Street

13 Changes to this Notice

- 13.1 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 **MDPA** 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 [here](#).