



<b>Document title</b>	Data Protection Policy
<b>Owner</b>	IT business unit/CTO
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### **Purpose & Scope**

This policy explains how Zanga African Metrics (“ZAM”, “we”, “us”) protects personal data collected through our psychometric assessments and related payment services delivered to clients and participants in Zambia, across Africa and globally. It applies to candidates, client administrators, and other users of our assessment platforms, including those who make or receive payments for ZAM services.

### **Our Legal Basis & Frameworks**

We comply with internationally recognized data protection laws, specifically: The European Union General Data Protection Regulation (EU GDPR), The United Kingdom General Data Protection Regulation (UK GDPR), and The Zambia Data Protection Act No. 3 of 2021. Where these laws differ, ZAM applies the highest standard of protection to ensure transparency, fairness, and accountability in how we process personal information.

### **What We Collect**

We process identification and contact details, psychometric assessment responses, platform usage data (e.g., IP address, browser type, timestamps), and where applicable, payment information. Payment data may include transaction references, billing details, and confirmation identifiers — never full card numbers or security codes. Payment processing is handled exclusively by secure, PCI-DSS-compliant third-party payment processors. ZAM does not directly store or access customers’ card or banking credentials.



### **How We Use Data (Purpose Limitation)**

We use data only to:

- administer assessments;
- process payments and issue invoices;
- generate reports for candidates and authorized client representatives;
- conduct research and analytics to improve assessment validity and fairness;
- deliver customer support; and
- comply with legal or regulatory obligations.

We do not use assessment or payment data for marketing purposes without explicit consent.

### **Lawful Processing & Consent**

Our primary lawful bases for processing are:

- Performance of contract, to deliver the psychometric and payment services requested; and
- Legitimate interests, to maintain quality, security, and integrity of our systems.

Where national law requires, or where special category data is inferred, ZAM obtains explicit consent prior to processing or secondary use.

### **Data Minimization & Retention**

We collect only the data necessary for the stated purposes. Assessment data is retained only for as long as necessary to provide reports and ensure auditability; payment records are retained for the legally required financial reporting period under Zambian and international standards. When no longer required, data is securely deleted or anonymized.

### **Security (ISO 27001 & PCI-DSS Alignment)**

We maintain an information security management system aligned with ISO/IEC 27001 and use PCI-DSS-compliant payment gateways. Measures include: encryption in transit and at rest, MFA for administrative access, regular penetration testing, least-privilege controls, vendor risk assessments, and employee confidentiality obligations.



### **Storage Location & Cross-Border Transfers**

ZAM uses reputable cloud service providers with secure data centres located in Africa and Europe. When transferring data outside Zambia, we ensure adequate safeguards consistent with the EU and UK GDPR (such as Standard Contractual Clauses) and the Zambia Data Protection Act to ensure equivalent protection standards.

### **Sharing with Third Parties**

We share data only with trusted third-party service providers (for hosting, payment processing, analytics, and customer support) who are contractually bound to uphold equivalent data protection and confidentiality standards. We do not sell or license client or participant data.

### **Data Subject Rights**

Individuals have the right to:

- Access, rectify, or delete their data;
- Restrict or object to processing;
- Request data portability; and
- Withdraw consent where applicable.

Requests are verified and handled within statutory timelines under GDPR and the Zambia Data Protection Act.

### **Breach Notification**

ZAM maintains an incident response plan and will notify affected individuals, clients, and regulators without undue delay in the event of a data breach, outlining the nature, consequences, and mitigation measures taken.

### **Governance, Accountability & Contact**

ZAM appoints a Data Protection Officer (DPO) responsible for compliance, training, and oversight of third-party processors. For any questions, concerns, or to exercise your data rights, contact: [support@zangametrics.com](mailto:support@zangametrics.com). In Zambia, individuals may also contact the Office of the Data Protection Commissioner.

### **Updates**

We may update this policy periodically to reflect changes in law or best practice. Significant updates will be communicated to clients and published on our platform.