

MIRACLE TECH GROUP COMPANY LIMITED

PRIVACY POLICY

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1. INTRODUCTION

Miracle Tech Group Company Limited ("Miracle Tech Group Company Limited", "we", "our", or "us") is committed to protecting the privacy, confidentiality, integrity, and security of Personal Data entrusted to us by our clients, business partners, employees, job applicants, website visitors, suppliers, and other individuals.

As a company providing cybersecurity services, digital forensics, information security consulting, software engineering, managed security services, governance, risk and compliance advisory, and related technology solutions, we recognize that privacy and data protection form an essential part of maintaining trust and safeguarding digital information.

This Privacy Policy explains how Miracle Tech collects, uses, stores, protects, shares, transfers, and otherwise processes Personal Data through our website, products, professional services, communications, and business operations.

This Privacy Policy has been prepared in accordance with:

- The Personal Data Protection Act, 2022 (United Republic of Tanzania);
- The Personal Data Protection Regulations and any applicable subsidiary legislation;
- Internationally recognized privacy principles;
- The General Data Protection Regulation (EU) 2016/679 ("GDPR"), where applicable;
- Other applicable legal and regulatory obligations governing privacy and information security.

By accessing our website, engaging in our services, communicating with us, or otherwise interacting with Miracle Tech, you acknowledge that your Personal Data may be processed in accordance with this Privacy Policy and applicable law.

2. SCOPE

This Privacy Policy applies to all Personal Data processed by Miracle Tech Group Company Limited in connection with its business activities.

It applies to:

- Visitors to our website;
- Clients and prospective clients;
- Employees and former employees;
- Job applicants;
- Consultants and contractors;
- Suppliers and service providers;
- Business partners;
- Event participants;
- Individuals whose Personal Data is processed while providing professional cybersecurity or digital forensic services.

This Privacy Policy applies regardless of whether Personal Data is collected:

- Through our website;
- By email;
- By telephone;
- During meetings;
- Through online platforms;
- Through software systems;
- During cybersecurity engagements;
- During digital forensic investigations;
- Through contractual relationships;
- Through other lawful business interactions.

DEFINITIONS

For purposes of this Privacy Policy, the following definitions apply.

Personal Data

Any information relating to an identified or identifiable natural person, whether directly or indirectly.

Processing

Any operation performed on Personal Data including collection, recording, organization, storage, adaptation, retrieval, consultation, use, disclosure, transmission, restriction, deletion, destruction, or any combination of these activities.

Data Subject

An identifiable individual whose Personal Data is processed by Miracle Tech Group Company Limited.

Data Controller

A natural or legal person who determines the purposes and means of processing Personal Data.

Data Processor

A natural or legal person who processes Personal Data on behalf of a Data Controller.

Personal Data Breach

A security incident leading to accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or unauthorized access to Personal Data.

Cookies

Small text files stored on a user's device that enable websites to recognize users, improve functionality, analyses usage, and enhance security.

Applicable Law

The Personal Data Protection Act, 2022 (Tanzania), applicable regulations, the GDPR where relevant, and any other applicable privacy or data protection legislation.

3. ABOUT MIRACLE TECH GROUP COMPANY LIMITED

Miracle Tech Group Company Limited is a technology and cybersecurity company incorporated in the United Republic of Tanzania.

We specialize in delivering professional technology and cybersecurity services, including:

- Cybersecurity Consulting;
- Penetration Testing;
- Vulnerability Assessments;
- Digital Forensics;
- Incident Response;
- Managed Security Services;
- Governance, Risk and Compliance (GRC);
- Information Security Audits;
- Security Awareness Training;
- Software Engineering;
- Network Security;
- Cloud Security;
- Security Operations Support;
- ICT Consultancy;
- Digital Transformation Solutions.

Our mission is to help organizations build secure, resilient, and compliant digital environments through innovative technology solutions and internationally recognized cybersecurity practices.

We are committed to protecting Personal Data entrusted to us and maintaining appropriate technical, organizational, and administrative safeguards throughout our operations.

4. OUR PRIVACY PRINCIPLES

Miracle Tech Group Company Limited is committed to processing Personal Data in a manner that is lawful, fair, transparent, secure, and accountable. Our privacy programme is built upon internationally recognized privacy principles and applicable legal requirements.

Lawfulness, Fairness and Transparency

We process Personal Data only where we have a valid legal basis under applicable law. Individuals are informed of how their Personal Data is collected, used, disclosed, retained, and protected through this Privacy Policy and other applicable notices.

Purpose Limitation

Personal Data is collected only for specified, explicit, and legitimate purposes. We will not process Personal Data for purposes incompatible with those originally communicated unless required or permitted by law.

Data Minimization

We collect only the Personal Data that is necessary, relevant, and proportionate for the services requested or for compliance with legal obligations.

Accuracy

Reasonable steps are taken to ensure that Personal Data is accurate, complete, and up to date. Individuals are encouraged to notify us promptly of any changes to their information.

Storage Limitation

Personal Data is retained only for as long as necessary to fulfil the purposes for which it was collected or to comply with applicable legal, regulatory, contractual, or professional obligations.

Integrity and Confidentiality

Appropriate administrative, technical, and physical safeguards are implemented to protect Personal Data against accidental or unlawful destruction, loss, alteration, unauthorized disclosure, or unauthorized access.

Accountability

Miracle Tech Group Company Limited maintains governance processes, internal policies, staff awareness programmes, and security controls designed to demonstrate compliance with applicable data protection laws.

5. CATEGORIES OF PERSONAL DATA WE COLLECT

Depending on the nature of our relationship with you, we may collect and process the following categories of Personal Data.

Identity Information

This may include:

- Full name;
- National Identification Number;
- Passport Number;
- Driver's License Number;
- Employee Identification Number;
- Professional Title;
- Date of Birth (where necessary).

Contact Information

Including:

- Email address;
- Telephone number;
- Postal address;
- Physical address;
- Country of residence;
- Region or city.

Business Information

Where services are provided to organizations, we may collect:

- Employer name;
- Business registration details;
- Company address;
- Job title;
- Department;
- Tax Identification Number (where applicable);
- VAT registration information.

Financial Information

Where necessary for billing or payment processing, we may collect:

- Bank account details;
- Invoice information;
- Payment references;
- Transaction history.

Payment card information is ordinarily processed by authorized third-party payment providers and is not intentionally stored by Miracle Tech Group Company Limited unless required by law or contract.

Technical Information

Our systems may automatically collect technical information, including:

- Internet Protocol (IP) address;
- Browser type and version;
- Operating system;
- Device identifiers;
- Login timestamps;
- Security logs;
- Network metadata;
- Session identifiers.

Cybersecurity and Digital Forensics Data

In the course of delivering cybersecurity services, we may process:

- Security events logs;
- Firewall logs;
- Endpoint detection records;
- Threat intelligence data;
- Malware samples;
- Vulnerability assessment reports;
- Penetration testing reports;
- Incident response records;
- Digital forensic images;
- System configuration information;
- Network traffic metadata.

Such information is processed solely for authorized professional purposes and subject to strict confidentiality obligations.

Recruitment Information

Where an individual applies for employment or consultancy opportunities, we may collect:

- Curriculum Vitae (CV);
- Employment history;
- Academic qualifications;
- Professional certifications;
- References;
- Interview records.

6. HOW WE COLLECT PERSONAL DATA

Miracle Tech Group Company Limited Collects Personal Data through lawful and transparent means.

Information Provided Directly by You

Personal Data may be collected when you:

- Contact us through our website;
- Request quotations;
- Purchase or enquire about our services;
- Register for training or events;
- Subscribe to newsletters;
- Submit support requests;
- Apply for employment.

Information Collected Automatically

When you visit our website or use our online services, certain technical information may be collected automatically using cookies, server logs, analytics tools, and similar technologies.

Such information may include:

- IP address;
- Browser information;
- Device information;
- Operating system;
- Date and time of access;
- Referring website;
- Pages visited;
- Session duration.

Information Received from Clients

Where Miracle Tech Group Company Limited provides cybersecurity, digital forensics, software engineering, or managed security services, clients may lawfully provide Personal Data necessary for the performance of contractual obligations.

Clients remain responsible for ensuring that they have appropriate authority to disclose such information to Miracle Tech.

Information from Third Parties

We may receive Personal Data from:

- Business partners;
- Technology vendors;
- Publicly available sources;
- Identity verification providers;
- Regulatory authorities;
- Law enforcement agencies were authorized by law.

7. LEGAL BASES FOR PROCESSING PERSONAL DATA

Where required by applicable law, Miracle Tech Group Company Limited Processes Personal Data only where an appropriate legal basis exists.

Depending on the circumstances, processing may be based upon one or more of the following:

Consent

Where an individual has freely given clear and informed consent for a specific purpose. Individuals may withdraw consent at any time where processing is based solely upon consent.

Performance of a Contract

Where does processing necessary to:

- Provide the services requested;
- Perform contractual obligations;
- Respond to service requests;
- Deliver cybersecurity engagements;
- Provide technical support.

Compliance with Legal Obligations

Processing may be necessary to comply with obligations arising under applicable legislation, regulatory requirements, court orders, or lawful requests by competent authorities.

Legitimate Interests

We may process Personal Data where necessary for our legitimate interests, provided such interests are not overridden by the rights and freedoms of the individual.

Examples include:

- Improving cybersecurity;
- Preventing fraud;
- Protecting information systems;
- Conducting internal audits;
- Managing business operations

7.2 Defending legal claims. Protection of Vital Interests

Where necessary to protect the life, health, or safety of an individual or another person.

8. PURPOSES OF PROCESSING PERSONAL DATA

Miracle Tech Group Company Limited Processes Personal Data only for specified, explicit, and legitimate purposes consistent with applicable data protection laws and professional obligations.

Depending on the nature of our relationship with you, we may process Personal Data for one or more of the following purposes.

Provision of Services

We process Personal Data to:

- Deliver cybersecurity services;
- Perform digital forensic investigations;
- Conduct vulnerability assessments;
- Perform penetration testing engagements;
- Provide managed security services;
- Deliver software engineering services;
- Provide ICT consultancy services;
- Implement cloud and network security solutions;
- Respond to client requests.

Customer Relationship Management

Personal Data may be processed to:

- Manage customer accounts;
- Respond to enquiries;
- Prepare quotations and proposals;
- Negotiate contracts;
- Maintain communication with clients;
- Provide customer support.

Performance of Contracts

Processing may be necessary for:

- Executing contractual obligations;
- Delivering agreed services;
- Managing service-level agreements;
- Administering projects;
- Processing invoices and payments.

Legal and Regulatory Compliance

We process Personal Data where necessary to:

- Comply with applicable laws;
- Meet regulatory obligations;
- Respond to lawful requests from competent authorities;
- Maintain statutory records;
- Cooperate with law enforcement agencies where legally required.

Information Security

Personal Data may be processed for the purpose of:

- Detecting cyber threats;
- Preventing unauthorized access;
- Monitoring network security;
- Investigating security incidents;
- Maintaining system integrity;
- Protecting confidential information.

Business Improvement

We may process Personal Data to:

- Improve our services;
- Enhance website functionality;
- Analyze customer experience;
- Develop new products and services;
- Conduct internal quality assurance reviews.

Recruitment and Human Resources

Where applicable, Personal Data may be processed to:

- Evaluate employment applications;
- Conduct interviews;
- Verify qualifications;
- Assess professional suitability;
- Administer employment relationships.

Marketing Communications

Where permitted by law or with your consent, we may use your contact information to:

- Send newsletters;
- Notify you of new services;
- Invite you to train programmes or events;
- Share cybersecurity alerts and industry updates.

You may opt out of marketing communications at any time by following the unsubscribe instructions or contacting us directly.

9. COOKIES AND TRACKING TECHNOLOGIES

Miracle Tech Group Company Limited uses cookies and similar technologies to improve website functionality, enhance security, analyses website performance, and improve user experience.

What are Cookies?

Cookies are small text files placed on your device when you visit a website. They enable websites to recognize returning visitors, remember preferences, improve performance, and support security functions.

Types of Cookies We Use

Essential Cookies

These cookies are necessary for:

- Website functionality;
- User authentication;
- Security;
- Session management.

These cookies cannot ordinarily be disabled without affecting website functionality.

Performance and Analytics Cookies

These cookies help us understand:

- Website usage;
- Visitor behavior;
- Popular pages;
- Website performance;
- Technical issues.

Information collected through analytics cookies is generally aggregated and does not directly identify individual users.

Functional Cookies

These cookies remember user preferences such as:

- Language settings;
- Region;
- Accessibility preferences;
- User interface customizations.

Security Cookies

Security cookies assist in:

- Detecting malicious activity;
- Preventing fraud;
- Protecting user accounts;
- Maintaining secure sessions.

Third-Party Cookies

Our website may use cookies provided by trusted third-party service providers, including analytics, security, or performance monitoring services.

Such providers process information in accordance with their own privacy policies.

Managing Cookies

Most web browsers allow users to:

- Accept cookies;
- Reject cookies;
- Delete stored cookies;
- Restrict tracking technologies.

Disabling certain cookies may affect website functionality and the availability of some services.

10. DISCLOSURE AND SHARING OF PERSONAL DATA

Miracle Tech does not sell Personal Data.

Personal Data may be disclosed only where necessary for legitimate business purposes, contractual performance, legal compliance, or with the individual's consent.

Disclosure to Employees

Access to Personal Data is restricted to authorized employees who require such access to perform their official duties.

Employees are subject to confidentiality obligations and receive appropriate privacy and information security training.

Disclosure to Service Providers

We may disclose Personal Data to trusted third-party service providers assisting us with:

- Cloud hosting;
- Data storage;
- Email services;
- Technical support;
- Payment processing;
- Managed IT services;
- Security monitoring.

Such providers are required to maintain appropriate confidentiality and security safeguards.

Disclosure to Professional Advisers

Where necessary, Personal Data may be shared with:

- Lawyers;
- External auditors;
- Accountants;
- Compliance advisers;
- Insurance providers.

Such disclosures occur only where necessary and subject to confidentiality obligations.

Disclosure Required by Law

Miracle Tech Group Company Limited may disclose Personal Data where required by:

- Court orders;
- Applicable legislation;
- Regulatory authorities;
- Law enforcement agencies;
- Government authorities acting within their lawful powers.

Business Transactions

Where Miracle Tech Group Company Limited undergoes a merger, acquisition, restructuring, investment transaction, or sale of business assets, Personal Data may be transferred as part of the transaction, subject to applicable legal safeguards.

11. THIRD-PARTY SERVICE PROVIDERS

Miracle Tech engages carefully selected third-party service providers to support our operations. Examples include providers of:

- Cloud infrastructure;
- Cybersecurity technologies;
- Email hosting;
- Data backup;
- Payment processing;
- Customer relationship management systems;
- Website hosting;
- Technical support services.

Before engaging a service provider, Miracle Tech Group Company Limited takes reasonable steps to ensure that appropriate contractual, organizational, and technical safeguards are in place to protect Personal Data.

Where required, Data Processing Agreements (DPAs) or equivalent contractual arrangements are entered into to ensure compliance with applicable data protection laws.

Third-party service providers are authorized to process Personal Data only for the specific purposes for which they have been engaged and are prohibited from using such data for their own independent purposes.

12. INTERNATIONAL TRANSFERS OF PERSONAL DATA

Miracle Tech Group Company Limited may transfer Personal Data outside the United Republic of Tanzania where necessary to provide services, utilize secure cloud infrastructure, or engage trusted service providers.

Where international transfers occur, Miracle Tech Group Company Limited implements appropriate safeguards to ensure that Personal Data remains protected in accordance with applicable legal requirements.

Such safeguards may include:

- Contractual data protection clauses;
- Transfers to jurisdictions recognized as providing adequate protection;
- Appropriate technical and organizational security measures;
- Data Processing Agreements;
- Other lawful transfer mechanisms are recognized under applicable law.

Where required by law, individuals will be informed of significant international transfers affecting their Personal Data.

13. INFORMATION SECURITY MEASURES

Miracle Tech Group Company Limited maintain a comprehensive information security programme designed to protect Personal Data against accidental or unlawful destruction, loss, alteration, unauthorized disclosure, or unauthorized access.

Our security measures include appropriate administrative, technical, organizational, and physical safeguards proportionate to the nature of the information processed and the risks involved.

Administrative Safeguards

These include:

- Information security policies;
- Privacy governance;
- Staff confidentiality agreements;
- Security awareness training;
- Access management procedures;
- Risk assessments;
- Internal audits.

Technical Safeguards

We implement technical controls including:

- Encryption where appropriate;
- Multi-factor authentication (MFA);
- Firewalls;
- Endpoint protection;
- Intrusion detection and monitoring;
- Secure system configurations;
- Vulnerability management;
- Security logging;
- Backup and disaster recovery measures.

Physical Safeguards

Physical security measures may include:

- Controlled office access;
- Visitor management procedures;
- Secure storage of records;
- Environmental protection for ICT equipment.

Although Miracle Tech employs appropriate safeguards, no method of electronic transmission or storage can be guaranteed to be completely secure. We continuously review and improve our security controls to reduce risks and maintain the confidentiality, integrity, and availability of Personal Data.

PERSONAL DATA BREACH MANAGEMENT

Miracle Tech Group Company Limited has established procedures for identifying, assessing, containing, investigating, documenting, and responding to Personal Data Breaches. Where a Personal Data Breach is identified, we will take appropriate steps to minimize potential harm, preserve evidence, and restore the security of affected systems.

Our response procedures may include:

- Immediate containment of the incident;
- Investigation and root cause analysis;
- Risk assessment;
- Recovery of affected systems;
- Documentation of the incident;
- Implementation of corrective actions;
- Review of security controls to prevent recurrence.

Where required under applicable law, Miracle Tech will notify the relevant regulatory authority and, where appropriate, affected individuals within **within 72 hours** of becoming aware of the breach.

DATA RETENTION

Miracle Tech Group Company Limited retains Personal Data only for as long as necessary to fulfil the purposes for which it was collected, to comply with legal and regulatory obligations, to resolve disputes, enforce agreements, and protect our legitimate business interests.

Retention periods vary depending on the nature of the Personal Data, the purpose of processing, contractual obligations, statutory requirements, and operational needs.

Retention Criteria

In determining appropriate retention periods, Miracle Tech considers:

- The purpose for which the Personal Data was collected;
- Applicable legal and regulatory requirements;
- Contractual obligations;
- The sensitivity of the Personal Data;
- The likelihood and severity of potential harm;
- Ongoing legal proceedings or investigations;
- Business continuity requirements.

Secure Disposal

Once Personal Data is no longer required, it will be securely deleted, anonymized, destroyed, or otherwise disposed of using appropriate technical and organizational measures designed to prevent unauthorized access, recovery, or disclosure.

Where secure deletion is not immediately possible due to backup or archival processes, the data will remain protected until permanent deletion can be completed.

RIGHTS OF DATASUBJECTS

Subject to applicable law, individuals whose Personal Data is processed by Miracle Tech Group Company Limited may have the following rights.

Right to be Informed

Individuals have the right to receive clear and transparent information regarding how their Personal Data is collected, used, stored, shared, and protected.

Right of Access

Individuals may request confirmation as to whether Miracle Tech Group Company Limited processes their Personal Data and may request access to such information, subject to applicable legal limitations.

Right to Rectification

Individuals may request correction of inaccurate, incomplete, or outdated Personal Data. Miracle Tech Group Company Limited will take reasonable steps to ensure that corrections are made without undue delay.

Right to Erasure

Where permitted by law, individuals may request deletion of their Personal Data where:

- The data is no longer necessary;
- Consent has been withdrawn and no other legal basis exists;
- Processing is unlawful;
- Deletion is required by applicable law.

This right is subject to legal, regulatory, contractual, and professional obligations requiring continued retention.

Right to Restriction of Processing

Individuals may request that processing of their Personal Data be restricted under circumstances permitted by applicable law.

Right to Object

Where processing is based upon legitimate interests or direct marketing, individuals may object to such processing, subject to applicable legal exceptions.

Right to Data Portability

Where required under applicable law and technically feasible, individuals may request that Personal Data be provided in a structured, commonly used, and machine-readable format or transferred to another controller.

Right to Withdraw Consent

Where processing is based solely on consent, individuals may withdraw that consent at any time without affecting the lawfulness of processing undertaken before withdrawal.

Exercising Your Rights

Requests relating to Personal Data rights may be submitted using the contact information provided in this Privacy Policy.

Miracle Tech Group Company Limited may request reasonable proof of identity before processing a request to protect against unauthorized disclosure of Personal Data.

14. CHILDREN'S PRIVACY

Miracle Tech Group Company Limited services are generally intended for businesses, organizations, government institutions, and adults.

We do not knowingly collect Personal Data from children unless such processing is authorized by law, necessary for the provision of a requested service, or carried out with the consent of a parent or legal guardian where required.

If Miracle Tech Group Company Limited becomes aware that Personal Data has been collected from a child in violation of applicable law, we will take reasonable steps to delete or otherwise lawfully manage such information without undue delay.

Parents or legal guardians who believe that a child has provided Personal Data to Miracle Tech Group Company Limited may contact us using the details provided in this Privacy Policy.

15. AUTOMATED DECISION-MAKING AND PROFILING

Miracle Tech Group Company Limited does not ordinarily make decisions based solely on automated processing, including profiling, where such decisions produce legal or similarly significant effects on individuals.

Where automated processing is used to enhance cybersecurity operations, fraud detection, threat intelligence, or service delivery, appropriate safeguards are implemented to protect the rights and freedoms of affected individuals.

Where required by applicable law, individuals will be informed of such processing and any rights available to them.

16. COMPLAINTS

Miracle Tech Group Company Limited takes privacy concerns seriously and is committed to addressing complaints fairly, transparently, and promptly.

If you believe that your Personal Data has been processed in a manner inconsistent with applicable data protection laws or this Privacy Policy, you are encouraged to contact us first so that we may investigate and attempt to resolve the matter.

Complaints should include sufficient information to enable us to understand the nature of the concern and identify the relevant processing activities.

Where required by applicable law, individuals also have the right to lodge a complaint with the competent data protection authority or other regulatory body responsible for overseeing personal data protection.

17. CHANGES TO THIS PRIVACY POLICY

Miracle Tech Group Company Limited may update this Privacy Policy from time to time to reflect:

- Changes in applicable laws or regulations;
- New technologies;
- Changes in our business operations;
- New products or services;
- Improvements in privacy practices;
- Security enhancements.

Where material changes are made, we will take reasonable steps to notify affected individuals through appropriate channels, including our website or other suitable means required by law.

The revised version of this Privacy Policy becomes effective from the date specified at the beginning of the document.

Individuals are encouraged to review this Privacy Policy periodically to remain informed about how Miracle Tech Group Company Limited protects Personal Data.

18. CONTACT INFORMATION

If you have any questions, requests, complaints, or concerns regarding this Privacy Policy or the processing of your Personal Data, please contact us using the details below.

MiracleTech Group Company: www.miracletechgroup.co.tz

Email: support@miracletech.co.tz

Address: Hse No 1, Komanya Street, Kijitonyama, Dar es Salaam, United Republic of Tanzania

Business Hours:

Monday – Friday: 08:00 AM – 06:00 PM (East Africa Time)

Saturday 08:00AM-02:00PM (East Africa Time)

Privacy-related requests may include:

- Requests for access to Personal Data;
- Requests for correction of Personal Data;
- Requests for deletion of Personal Data;
- Questions regarding this Privacy Policy;
- Data breach notifications;
- General privacy enquiries.

Miracle Tech Group Company Limited will make reasonable efforts to respond to legitimate privacy requests within the timeframes prescribed by applicable law.

ACKNOWLEDGEMENT

By accessing our website, using our services, communicating with Miracle Tech Group Company Limited, or otherwise providing Personal Data, you acknowledge that you have read, understood, and accepted this Privacy Policy to the extent permitted by applicable law.

Nothing in this Privacy Policy shall limit or exclude any rights or obligations that cannot lawfully be excluded under the Personal Data Protection Act, 2022 (Tanzania), the General Data Protection Regulation (GDPR), or any other applicable legislation.

ANNEXES

The following Annexes form part of this Privacy Policy and provide additional information regarding Miracle Tech Group Company Limited 's privacy governance framework, technical safeguards, operational procedures, and compliance with applicable data protection laws.

ANNEX A**DATASUBJECT REQUEST (DSAR) PROCEDURE**

Miracle Tech Group Company Limited recognizes and respects the rights of Data Subjects under the Personal Data Protection Act, 2022 (Tanzania), the General Data Protection Regulation (GDPR), where applicable, and other relevant privacy legislation.

Individuals may submit requests concerning their Personal Data at any time.

Types of Requests

A Data Subject may request:

- Confirmation that Personal Data is being processed;
- Access to Personal Data;
- Correction of inaccurate information;
- Deletion of Personal Data where legally permitted;
- Restriction of processing;
- Withdrawal of consent;
- Data portability where applicable;
- Information regarding data processing activities;
- Objection to certain processing activities.

Submission of Requests

Requests should be submitted through one of the following channels:

Email:

info@miracletechgroup.com, info@miracletech.co.tz

Website:

www.miracletechgroup.co.tz

Requests should contain sufficient information to enable Miracle Tech Group Company Limited to identify the requester and understand the nature of the request.

Identity Verification

Before responding to a request, Miracle Tech Group Company Limited may require reasonable evidence confirming the identity of the requester to prevent unauthorized disclosure of Personal Data.

Response Time

Miracle Tech Group Company Limited will respond within the period prescribed by applicable law.

Where additional time is reasonably required because of the complexity of a request, the requester will be informed accordingly.

Refusal of Requests

Miracle Tech Group Company Limited reserves the right to refuse requests were permitted by applicable law, including where disclosure would:

- Violate legal obligations;
- Infringe the rights of others;
- Compromise cybersecurity investigations;
- Affect ongoing legal proceedings;
- Endanger public safety or national security.

ANNEX B

INTERNATIONAL DATA TRANSFER SAFEGUARDS

Personal Data is transfer outside Tanzania, is done subject to the requisite approvals and permits issued by the Tanzanian Personal Data Protection Commission (PDPC). Miracle Tech Group Company Limited implements appropriate safeguards to ensure continued protection. These safeguards may include:

- Contractual data protection clauses;
- Data Processing Agreements;
- Encryption during transmission;
- Encryption at rest;
- Secure VPN connections;
- Access controls;
- Risk assessments;
- Confidentiality agreements;
- Security monitoring.

International transfers are undertaken only where there is a legitimate business purpose or legal basis.

ANNEX C

TECHNICAL AND ORGANISATIONAL SECURITY MEASURES

Miracle Tech Group Company Limited maintains a comprehensive information security programme based upon internationally recognized cybersecurity practices. Security controls may include:

Administrative Controls

- Information Security Policies;
- Privacy Policies;
- Acceptable Use Policies;
- Risk Management;
- Vendor Risk Assessments;
- Internal Audits;
- Security Awareness Training.

Technical Controls

- Multi-Factor Authentication (MFA);
- Encryption;
- Endpoint Detection and Response (EDR);
- Security Information and Event Management (SIEM);
- Firewalls;
- Intrusion Detection Systems (IDS);
- Intrusion Prevention Systems (IPS);
- Secure Configuration Management;
- Network Segmentation;
- Vulnerability Management;
- Patch Management;
- Secure Backup Solutions;
- Disaster Recovery Planning.

Physical Controls

- Secure office facilities;
- Visitor access management;
- CCTV monitoring where applicable;
- Secure document storage;
- Environmental protection controls.

Miracle Tech Group Company Limited regularly reviews and updates these measures to address emerging cybersecurity threats.

ANNEX D

DATA RETENTION SCHEDULE

The following table provides general retention guidance.

Category	Typical Retention Period
Client Records	Duration of contract plus applicable legal retention period
Financial Records	As required under applicable tax and financial legislation
Recruitment Records	As permitted by applicable employment laws
Security Logs	According to operational and security requirements
Incident Response Records	As required for legal, contractual, and security purposes
Digital Forensic Evidence	According to contractual, evidential, or legal requirements
Website Analytics	Limited retention necessary for business analytics
Marketing Records	Until consent is withdrawn or no longer required

Actual retention periods may vary depending upon legal, contractual, or regulatory obligations.

ANNEX E

COOKIE CATEGORIES

Users may manage cookie preferences through browser settings.

Cookie Type	Purpose
Essential Cookies	Website operation and security
Authentication Cookies	User login and session management
Functional Cookies	Remember user preferences
Analytics Cookies	Website performance analysis
Security Cookies	Fraud Prevention and thread detection
Preference Cookies	Improve user experience

ANNEX F

GLOSSARY

Personal Data

Information relating to an identified or identifiable natural person.

Processing

Any operation performed on Personal Data.

Data Subject

The individual whose Personal Data is processed.

Data Controller

The organization determines the purposes and means of processing Personal Data.

Data Processor

The organization processes Personal Data on behalf of a Data Controller.

Cybersecurity

The protection of information systems, networks, devices, and digital assets from cyber threats.

Digital Forensics

The identification, preservation, collection, examination, analysis, and presentation of digital evidence.

Incident Response

The structured process of detecting, investigating, containing, eradicating, recovering from, and documenting cybersecurity incidents.

Personal Data Breach

A breach of security leads to accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to Personal Data.

FINAL STATEMENT

Privacy is a fundamental element of trust, accountability, and responsible business practice.

Miracle Tech Group Company Limited remains committed to protecting Personal Data through strong governance, internationally recognized cybersecurity practices, continuous improvement, and compliance with applicable laws and regulations.

This Privacy Policy should be read together with Miracle Tech Group Company Limited internal information security policies, contractual agreements, and any supplementary privacy notices issued for specific services or processing activities.