

PRIVACY POLICY

Arcana Consulting Group ("ACG", "we", "us", "our") respects your privacy and is committed to protecting your personal information. This Privacy Policy explains how we collect, use, store, disclose, and protect personal information when you visit our website, contact us, use our consulting services, subscribe to our communications, or otherwise interact with us. This Privacy Policy is intended to align with the laws of Zimbabwe, including the Constitution of Zimbabwe and the Cyber and Data Protection Act [Chapter 12:07], together with applicable regulations and lawful directions of the relevant authorities.

1. Scope of This Policy

This Privacy Policy applies to personal information collected through:

- our website;
- contact forms, email, phone, and other communications;
- client onboarding and service delivery;
- newsletter or marketing sign-ups;
- cookies and similar website technologies; and
- any other interaction where we collect personal information through digital means.

2. Personal Information We Collect

We may collect and process the following categories of personal information:

- identification details, such as your name;
- contact information, such as your email address, telephone number, and physical address;
- business and professional details, such as company name, job title, and industry;
- account, inquiry, and correspondence information you provide to us;
- billing and transaction details where relevant;
- technical and device information, such as IP address, browser type, operating system, device identifiers, referral URLs, and website usage data;
- records of your preferences, consents, and subscriptions; and
- any other information you voluntarily provide to us.

We do not intentionally collect sensitive personal information unless it is reasonably necessary for a lawful business purpose and handled in accordance with applicable law.

3. How We Collect Personal Information

We collect personal information:

- directly from you when you complete forms, contact us, request services, or communicate with us;
- automatically when you use our website, through cookies, analytics tools, server logs, and similar technologies;
- from publicly available sources;
- from your employer or organisation where you engage us on its behalf; and

- from trusted third-party service providers or referral sources, where lawful.

4. Why We Process Your Personal Information

We process personal information for legitimate and lawful business purposes, including to:

- respond to inquiries and communicate with you;
- provide, manage, and improve our consulting services;
- onboard clients and administer engagements;
- send service-related notices and updates;
- provide newsletters, insights, or marketing communications where lawful or with consent where required;
- personalise website content and improve user experience;
- monitor, maintain, and secure our website, systems, and data;
- detect, investigate, prevent, and respond to cyber-security incidents, fraud, misuse, and unlawful activity;
- comply with legal, regulatory, tax, accounting, and reporting obligations; and
- establish, exercise, or defend legal rights and claims.

We will not process your personal information in a manner incompatible with the purpose for which it was collected, except where permitted or required by law.

5. Legal Basis and Lawful Processing

Where required under applicable law, we process personal information on one or more of the following grounds:

- your consent;
- performance of a contract or steps taken at your request before entering into a contract;
- compliance with a legal obligation;
- protection of legitimate interests of our business, provided your rights and interests are not unfairly prejudiced;
- or
- any other lawful basis recognised under Zimbabwean law.

6. Data Quality and Minimisation

- We take reasonable steps to ensure that personal information we process is:
- collected lawfully and fairly;
- relevant, adequate, and not excessive for the purpose for which it is processed;
- accurate and, where necessary, kept up to date; and
- retained only for as long as reasonably necessary for lawful business, legal, or regulatory purposes.

7. Cookies and Similar Technologies

Our website may use cookies, analytics tools, and similar technologies to:

- keep the website functional;
- remember preferences;
- understand website traffic and usage patterns;

- improve performance and security; and
- support communications and marketing where permitted.

You may adjust your browser settings to reject or manage cookies. However, some parts of the website may not function properly if cookies are disabled.

8. Direct Marketing

Where we send newsletters, updates, or promotional communications, we will do so in accordance with applicable law. You may opt out of marketing communications at any time by:

- clicking the unsubscribe link in the communication; or
- contacting us using the details in this Privacy Policy.
- We will honour lawful objections to direct marketing within a reasonable time.

9. Disclosure of Personal Information

We may disclose personal information only where necessary and lawful, including to:

- our employees, officers, and authorised personnel on a need-to-know basis;
- professional advisers, including lawyers, auditors, and accountants;
- cloud hosting, IT, cyber-security, analytics, CRM, email, and other service providers who process data on our instructions;
- payment processors and financial institutions where relevant;
- regulators, law enforcement agencies, courts, or public authorities where disclosure is required or authorised by law; and
- a purchaser, successor, or reorganised entity in connection with a merger, acquisition, restructuring, or sale of assets, subject to appropriate confidentiality protections.

Where third parties process personal information on our behalf, we require them to maintain confidentiality and appropriate security safeguards.

10. International and Cross-Border Transfers

Your personal information may be stored or processed in Zimbabwe or in other countries where our service providers operate. Where personal information is transferred outside Zimbabwe, we will take reasonable steps to ensure that:

- the transfer is lawful;
- the recipient is subject to an adequate level of data protection and security; and
- appropriate contractual, organisational, and technical safeguards are in place.

By using our website or providing information to us, you acknowledge that cross-border processing may occur where necessary for our business operations, subject to applicable law.

11. Cyber-Security and Information Security

We take cyber-security seriously. We implement appropriate technical, administrative, and organisational safeguards designed to protect personal information against loss, misuse, unauthorised access, disclosure, alteration, destruction, and unlawful processing. These measures may include:

- access controls and role-based permissions;
- strong password policies and multi-factor authentication where appropriate;
- encryption of data in transit and, where appropriate, at rest;
- endpoint protection, firewalls, logging, and monitoring;
- secure backup and recovery procedures;
- vulnerability management, patching, and system maintenance;
- restricted access to client data;
- staff confidentiality obligations and privacy/security training;
- vendor due diligence and contractual security obligations; and
- incident response and breach management procedures.

While we take reasonable measures to secure information, no website, network, or transmission method is completely secure. We therefore cannot guarantee absolute security.

12. Personal Data Breach Response

If we become aware of a personal data breach, we will take prompt steps to contain, assess, investigate, and remediate the incident. Where required by applicable Zimbabwean law, we will notify the relevant authority and affected individuals within the time required by law, particularly where the breach is likely to create a high risk to the rights or freedoms of affected persons.

13. Retention of Personal Information

We retain personal information only for as long as necessary for the purposes described in this Privacy Policy, including to:

- provide services;
- maintain business and financial records;
- comply with legal, regulatory, tax, audit, and professional obligations;
- resolve disputes; and
- enforce agreements.

When personal information is no longer required, we will securely delete, destroy, anonymise, or de-identify it, subject to applicable retention obligations.

14. Your Rights

Subject to Zimbabwean law and any lawful limitations, you may have the right to:

- be informed about the use of your personal information;
- request access to personal information we hold about you;
- object to the processing of all or part of your personal information;
- request correction of inaccurate, false, or misleading personal information; and
- request deletion of false or misleading personal information or information processed unlawfully.

To exercise any of these rights, please contact us using the contact details below. We may ask for information necessary to verify your identity before acting on your request.

15. Children's Privacy

Our website and services are not intended for children under 18 unless expressly stated otherwise. We do not knowingly collect personal information from children without lawful authority. If personal information relating to a child must be processed, we will do so only with the consent or authority of a parent or legal guardian, or as otherwise permitted by law. If you believe that a child has provided personal information to us unlawfully, please contact us so that we can take appropriate action.

16. Third-Party Links and Services

Our website may contain links to third-party websites, plug-ins, or services. We are not responsible for the privacy, content, or security practices of those third parties. You should review their privacy policies before providing personal information to them.

17. Automated Decision-Making

We do not make decisions producing legal or similarly significant effects based solely on automated processing unless permitted by law and supported by appropriate safeguards.

18. Changes to This Privacy Policy

We may update this Privacy Policy from time to time to reflect changes in our services, technology, legal obligations, or business practices. The updated version will be posted on this page with a revised "Last Updated" date. Where required, we will take reasonable steps to notify you of material changes.

19. Contact Us

If you have any questions, concerns, requests, or complaints about this Privacy Policy or our handling of personal information, please contact info@arcanacg.com.

20. Governing Law

This Privacy Policy shall be governed by and interpreted in accordance with the laws of Zimbabwe.