



MTN POSITION STATEMENT

Data Privacy and Protection

The issue

MTN processes large volumes of personal information across multiple systems and processes across the Group. Operating in diverse regulatory environments, MTN recognises that data privacy is a human right and that protecting personal information is fundamental to fair dealing, ethical conduct and the protection of human rights. MTN conducts its business in accordance with the letter and spirit of applicable regulatory and legislative requirements in its markets, acting with due skill, care and diligence.

Linking the issue to our strategy

MTN is committed to protecting the privacy of all its stakeholders and ensuring the confidentiality, integrity and availability of their personal information. Personal information is collected to provide customers with effective products and services and is limited to what is relevant and necessary for that purpose.

MTN's approach to data privacy and protection is guided by globally defined standards and governance frameworks, including ISO/IEC 27001, the NIST Cybersecurity Framework, Critical Security Controls, GDPR, POPIA and King IV on Corporate Governance.

MTN recognises data privacy and protection as a key governance and risk consideration, integral to responsible business conduct. The Group applies a risk-based approach to identifying, assessing and managing privacy and data protection risks across its operations.

MTN's customer human rights are addressed through a suite of policies, including digital human rights, data privacy and protection, and information security. MTN's due diligence approach to data privacy and protection is iterative and ongoing, reflecting the evolving technology, regulatory, social and political environment.

Scope

This position statement applies to MTN Group and its operating companies and covers the processing of records of personal data, whether undertaken directly by MTN or by third parties acting on MTN's behalf, including the collection, processing, storage, transfer, disclosure and protection of personal information relating to customers, employees and other data subjects. It reflects MTN's Group Data Privacy and Protection Policy and its application across jurisdictions in which MTN operates, including activities undertaken by contractors, affiliates and third parties on MTN's behalf.

Our commitments

Direct operations

MTN commits to:

- Processing personal information lawfully and in a manner that does not unfairly infringe the privacy rights of data subjects.
- Collecting personal information for defined, legitimate business purposes and limiting collection to what is relevant and necessary.
- Processing personal information only on a lawful basis, including consent where required, and ensuring consent may be withdrawn.
- Ensuring personal information is complete, accurate, not misleading and updated where necessary.



- Retaining personal information only for as long as required to achieve the purpose for which it was collected or as permitted by applicable law.
- Adopting an open and transparent approach to personal information processing, recognising the rights of data subjects to access information held about them.
- Conducting direct marketing in compliance with applicable data privacy and data protection laws.
- Applying the principles of privacy by design and privacy by default when processing personal information.

Value chain and third parties

MTN commits to:

- Ensuring the protection of personal information processed by third parties contracted to MTN.
- Requiring third parties, including service providers, suppliers, sub-contractors and other MTN Group entities, to safeguard personal information and treat it in accordance with applicable data privacy laws.
- Monitoring and managing privacy and data protection risks posed by third-party processors.
- Making sure personal information is not transferred cross-border unless agreed conditions and lawful requirements are met.
- Sharing personal information with government or law-enforcement authorities only where mandated under law.

Security and risk management

- Safeguarding personal information under its control through appropriate and reasonable technical, physical and organisational security measures.
- Maintaining security practices and procedures aligned with international and industry standards.
- Managing personal data breaches in accordance with MTN's incident-management processes and applicable legal requirements.
- Applying appropriate procedures to erase, anonymise or render personal information unreadable when it is disposed of.
- Monitoring digital platforms and networks to maintain security and manage risks associated with internet use.

Accountability and governance

- Accountability for data privacy and protection is assigned across the MTN Group in each jurisdiction.
- The MTN Board oversees the Group's actions and performance regarding data privacy and protection, supported by the Risk Management and Compliance Committee.
- Group Regulatory and Corporate Affairs, Group Legal and Group Risk and Compliance provide regulatory oversight, legal guidance, policy governance and compliance monitoring.
- Executive committees at operating companies are responsible for oversight and compliance with the MTN Group Data Privacy and Protection Policy and applicable local legislation.
- MTN is committed to transparency and disclosure regarding its data privacy and protection performance, with ongoing monitoring and reporting to relevant stakeholders.
- MTN continuously reviews and improves its data privacy and protection approach to ensure continued alignment with applicable laws, governance standards and evolving risks.



Awareness, training and communication

MTN directors, employees and relevant third parties have access to data privacy and protection policies and receive regular communications relating to applicable policies, notices and procedures. MTN reinforces ethical conduct and respect for privacy rights through its Conduct Passport.

Stakeholder rights and engagement

MTN recognises and supports the rights of data subjects, including the right to:

- Access personal information held by MTN.
- Correct personal information to ensure accuracy and completeness.
- Object to the processing of personal information in certain circumstances.
- Data portability, where permitted by law.
- Opt out of marketing communications.
- Request erasure or destruction of personal information, subject to lawful retention requirements.
- Lodge a complaint with MTN or a relevant supervisory authority where data protection rights are infringed.

Data subjects may exercise these rights or raise concerns by contacting humanrights@mtn.com.