



## DATA PROTECTION PRIVACY POLICY – BERWA AFRICA COMPANY LIMITED

**Date:** 02<sup>nd</sup> April 2026

### Legal and Regulatory Framework

Berwa Africa Company Limited complies with Tanzania's Personal Data Protection Act (PDPA) 2022 (effective May 1, 2023) and aligns with international standards (e.g. GDPR). Under PDPA Section 14 (1), no organization may collect or process personal data without registering as a data controller / processor with the Personal Data Protection Commission (PDPC). In fact, all entities handling personal data must register and appoint a Data Protection Officer (DPO). The PDPA establishes core processing principles: data must be processed lawfully, fairly, transparently and securely, collected only for specified legitimate purposes, accurate and up-to-date, adequate and limited to necessity, and retained only as long as necessary.

### Personal Data Collected

Berwa Africa Company Limited collects personal data of its clients only as needed for business services. Specifically, we may collect:

- **Identity details:** full name, national ID or passport number, Tax Identification Number (TIN).
- **Contact details:** postal address, phone/mobile number, email address.
- **Professional details:** Curriculum Vitae/resume, job title, company affiliation (if relevant).
- **Payment and transaction data:** payment receipts, order history, invoice details.

All such information is “personal data” under PDPA (any information identifying an individual). We limit data collection to what is necessary: for example, we do not collect sensitive data (health, religion, etc.) unless explicitly required and legally permitted.

### Purpose of Processing

We use client personal data only for clear, legitimate business purposes. These include:

- Providing our graphic design, printing, photography, and stationery services.
- Communicating with clients about projects (via phone, email, or written correspondence).
- Processing orders, invoices, and payment receipts securely.
- Delivering services and products to clients.
- Maintaining customer records for service history, accounting, and support.

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We do not use client data for purposes beyond those stated (no unrelated marketing or profiling). This purpose limitation is required by law. Where applicable, we obtain consent or rely on our contractual/legal obligation as the lawful basis for processing.

### Data Security Measures

Berwa Africa Company Limited implements robust technical and organizational safeguards to protect personal data. Measures include:

- **Access Controls:** Systems and files are protected by strong passwords and multi-factor authentication. Only authorized personnel may access client data, based on role and need.
- **Information Security Policies:** Written policies and procedures govern data handling. These are regularly reviewed and updated, and employees are trained on data protection obligations.
- **Encrypted and Secure Storage:** Electronic data is stored on secure servers with encryption at rest/in transit. Paper records (if any) are kept in locked cabinets. We ensure storage devices are protected against unauthorized use or alteration.
- **Network and System Security:** Firewalls, anti-virus software, and security monitoring protect our IT systems from hacking and malware. Updates and vulnerability scans are performed regularly.
- **Backups and Logging:** Data is backed up frequently. We maintain logs and audit trails of data access and processing activities for incident analysis and to detect any suspicious activity.
- **Incident Response:** We have procedures to detect, report, and respond to data breaches. In the event of a security incident (e.g. unauthorized access, data leakage, theft), our DPO will promptly investigate, contain the breach, notify affected data subjects and the PDPC as required, and take remedial action.
- **Confidentiality Agreements:** All staff sign confidentiality and data protection commitments. Physical access to offices is restricted to authorized personnel only.

These measures reflect PDPA Regulation 27 principles and industry best practice, aiming to prevent unauthorized access, data loss, theft, and cyber-attacks.

### Data Retention and Disposal

We retain personal data only for as long as needed to fulfill its processing purpose and comply with legal obligations. For example, we may keep client records for the duration of an ongoing project plus additional years as required by tax or accounting laws (or until data subject requests erasure, subject to

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any overriding legal requirements). Once data is no longer needed, it is securely deleted or destroyed: electronic data is wiped from servers and backups, and paper records are shredded. We periodically review retention periods and ensure that data is not held longer than justified.

### Data Subject Rights

Berwa Africa Company Limited fully respects the rights of clients under the PDPA. In summary, clients (as data subjects) have the right to:

- **Be Informed:** Know whether we hold or process their personal data, and if so, to receive a description of the data, processing purposes, and any recipients or categories of recipients. (For example, a client can ask us to confirm what data we have on file and why.)
- **Access and Copies:** Obtain a copy of their personal data in our records, along with details of how it is processed.
- **Rectification/Erasure:** Request correction of inaccurate or incomplete data. Clients may also ask the PDPC to order us to block, erase, or destroy data that is no longer accurate or unlawfully processed.
- **Restriction of Processing:** Object to or require suspension of processing that is causing or likely to cause substantial damage or distress.
- **Object to Marketing:** Opt-out of any processing for direct marketing purposes at any time.
- **Data Portability:** Receive their data in a structured, commonly-used format (where applicable).
- **Not be subject to Automated Decisions:** If any automated decision-making (including profiling) is used, clients have the right to meaningful information about the logic and to challenge decisions (noting that Berwa Africa currently relies on human judgment in client dealings).

Clients exercising these rights should contact our Data Protection Officer (see below). We will respond promptly in accordance with PDPA timelines (e.g. within 30 days for access requests). Note: PDPA also provides certain legal exemptions (e.g. if data is inaccurate, under investigation, or subject to a court order, we may withhold information).

### Data Transfers

Berwa Africa normally processes data within Tanzania. We do not transfer personal data internationally unless strictly necessary (for example, if a service provider is located abroad). Any cross-border transfer

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is done in compliance with PDPA requirements, ensuring the destination offers adequate protection (or using approved safeguards).

### **Data Protection Officer (DPO) and Contact**

In compliance with PDPA Section 32, Berwa Africa Company Limited has appointed a qualified Data Protection Officer (DPO). The DPO oversees our data protection program and ensures ongoing compliance. The DPO's duties include establishing safeguards, monitoring processing activities, handling client queries and complaints, and reporting to the PDPC. For any questions about this privacy policy or data processing, or to exercise your rights, please contact our DPO at [tz@berwaafrica.com](mailto:tz@berwaafrica.com) or [berwaafrica1@gmail.com](mailto:berwaafrica1@gmail.com) or write to: Data Protection Officer, Berwa Africa Company Ltd., P.O. Box 8436, Dar es Salaam. Clients may also contact the PDPC directly via [helpdesk@pdpc.go.tz](mailto:helpdesk@pdpc.go.tz).

### **Employee Responsibilities and Implementation**

All Berwa Africa Company Limited employees and contractors are required to follow this privacy policy and related internal procedures. Management will ensure:

- **Awareness and Training:** Staff receive regular training on personal data protection, confidentiality, and security protocols.
- **Internal Policies:** Information security policies, acceptable use policies, and data handling procedures are documented and enforced.
- **Access Control:** User accounts and permissions are reviewed periodically; access to client data is granted only on a need-to-know basis.
- **Incident Reporting:** Employees must report any suspected data breach or security weakness immediately to the DPO.
- **Audit and Review:** We conduct periodic audits to verify compliance with this policy and the PDPA. Data protection responsibilities are integrated into job descriptions where relevant.
- Management (through the DPO) will update this policy as needed and ensure it is communicated to all staff. Supervisors and the DPO monitor compliance and take corrective actions for any violations.

### **Summary of Compliance**

In summary, Berwa Africa Company Limited's privacy policy is designed to meet Tanzania's PDPA requirements and reflect global best practices. We collect only necessary client data, process it for legitimate business purposes, protect it with strong security controls, honor data subject rights, and

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retain data only as needed. We are fully registered with the PDPC and maintain a DPO to oversee these efforts. By implementing these measures, we safeguard client privacy and mitigate risks (legal, operational and reputational).

**Sources:** Tanzania Personal Data Protection Act 2022 and PDPC regulations; PDPC guidance and legal analyses; GDPR principles; practitioner summaries. All measures above are in accordance with PDPA Chapter 44 and related regulations.

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