

First Pack Marketing Privacy Notice

At First Pack Marketing (“First Pack”, “we”, “us”), protecting your personal data is a priority. This Privacy Notice explains how we collect, use, and protect your personal data when you interact with us:

- Through our websites and digital platforms (“Websites”)
- Through our social media channels (“Social Media”)
- Through email communications we send you (“Emails”)
- Through our products, services, and customer support (“Services”)
- Through walk-in visits, meetings, and other in-person interactions (“In-Person Interactions”)

By providing your personal data to us through any of the channels above, you agree to the processing set out in this Privacy notice. Further notices highlighting certain uses we wish to make of your personal data together with the ability to opt in or out of selected uses may also be provided to you when we collect personal data from you.

1. What Personal Data we process:

For the purposes of this Privacy Notice, personal data means any information or set of information that directly or indirectly identifies any individual. In the provision of our services, we may process the following categories of personal data:

- Your Names
- Your identification numbers
- Contact details (including telephone numbers, email addresses and physical addresses)
- Where necessary, employment and financial history

2. Why We Process Your Personal Data

We may process your personal data for the following purposes:

PURPOSE	DESCRIPTION	LEGAL BASIS
Responding to Your Queries	When you contact us via our Websites, social media, or other channels, we process your personal data to respond to your inquiries or requests.	Your consent, which you can withdraw at any time
Marketing and Surveys	With your consent, we send marketing materials, offers, or surveys about our products and services. We may also analyse your	Your consent, which you can withdraw at any time.

	preferences to personalize these communications.	
Product and Service Improvement	We use aggregated or individual data to enhance our products, Websites, and services, identify trends, and improve customer experience.	Our legitimate interests in improving products and services
Website Management	To ensure technical functionality, security, and user-friendliness of our websites, we collect certain device information (e.g., IP address, device type).	Our legitimate business interests.
Account Management	If you create an account with us, we process your details to manage and administer your account.	Your consent, which you can withdraw at any time, and contractual obligations
Order Processing and Delivery	When you purchase products, we use your data to process orders, deliver products, and manage the transaction.	Fulfilling our contract with you.
Competitions, Promotions, and Events	If you participate in contests or events, we process your personal data to manage your participation and communicate results.	Your consent, which you can withdraw at any time.
Compliance and Legal Obligations	To comply with applicable laws, including Zimbabwean regulations such as the Cyber and Data Protection Act, and to protect our assets, rights, and legal interests.	Legal obligations and our legitimate interests.
Employment Onboarding	If you apply for a job at First Pack, to interact with you about our job opportunities and to assess your suitability for the position applied for including conducting background checks.	Your consent, which you can withdraw at any time.
Biometric Data	We may collect and process biometric data (e.g., images, videos, or other identifiers) if you choose to share such data, and through our CCTV surveillance on premises	Your explicit consent, which you can withdraw at any time.

In general, we will use the personal data we collect from you only for the purposes described in this Privacy Notice or for purposes that we explain to you at the time we collect your personal data.

If you provide us with information about someone else, please ensure you have that person's permission to do so for the purposes detailed in this Privacy Notice. By providing personal data relating to another person, you confirm that you have their consent to do so or are entitled to consent to the processing on their behalf

3. Cookies and Tracking Technology

We may use cookies and similar technologies to improve your experience when using our website, for analytics, and (with your consent) for personalized advertising. You can manage your cookie preferences via your device settings.

4. Sharing Your Personal Data

We may share your personal data with:

- Our trusted business partners and third-party service providers assisting us (e.g. ICT service providers, payment service providers, consulting, and shipping providers), professional advisors (such as banks, insurance companies, auditors, lawyers, accountants, or other professional advisors), that process personal data on our behalf for purposes that are described in this Privacy Notice, in our Cookie Notice, or for the purposes notified to you when we collect your personal data. To ensure that your personal data is treated with a high level of protection, First Pack have agreed technical, organizational and contractual measures (such as data processing agreements) with third party suppliers to ensure that your personal data is exclusively processed for the purposes mentioned above and to ensure that your personal data is well secured.
- Any competent law enforcement body, regulatory, government agency, court, or other third party if we believe disclosure is necessary: (i) as a matter of applicable law or regulation; (ii) to exercise, establish or defend our legal rights; or (iii) to protect your vital interests or those of any other person;
- Other specified parties, but only if you have consented to, or if you have instructed us to make such disclosure to such parties.

5. Data Storage and Transfers

We primarily store your data within Zimbabwe and with 3rd party cloud providers namely Azure, Google Cloud and Amazon Web Services. If international data transfers occur, we will first notify you and obtain your consent and ensure appropriate technical and organisational safeguards within the recipient country and entity, in line with the Cyber and Data Protection Act and any other applicable regulations.

6. Data Security

Your personal data are treated confidential, and we have taken technical and organizational security measures against loss or unlawful processing of this data. We use several security techniques including secure servers, firewalls, and encryption, as well as physical safeguard of the locations where data is stored. We are constantly working on improving these security measures to help keep your personal data secure.

You should be aware that the transmission of information via the internet is not completely secure. Although we will do what we reasonably can to protect your personal data, we cannot guarantee the security of any personal data that you disclose online. You accept the inherent security implications of using the internet and we will not be responsible for any breach of security unless we have been in breach of applicable laws, and then only to the limits set out in any relevant terms and conditions.

7. Data Retention

We will retain your personal data for the period necessary to fulfil the purposes outlined in this Notice unless a longer retention period is required or permitted by applicable law. For example, to provide you with a service you have requested, to comply with applicable legal, tax, or accounting requirements or whether retention is advisable considering our legal position (for example regarding litigation or regulatory investigations).

8. Your Rights

You have the right to access, correct, update, or request deletion of your personal data. In addition, you can object to the processing of your personal data, ask us to restrict processing of your personal data or request portability of your personal data. You can exercise these rights by filling the form through this link.

You have the right to withdraw consent (“opt-out”) of marketing communications we send you at any time. You can exercise this right by clicking the unsubscribe or opt-out link in the emails we send you or you can fill the form through this link.

Similarly, if we have collected and processed your personal data with your consent, then you can withdraw your consent at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your personal data conducted in reliance on lawful processing grounds other than consent.

Whilst we would prefer you to come to us first with any complaints, you have the right to complain to a data protection authority about our collection and use of your personal data. For more information, please contact your local data protection authority.

We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws and free of charge. In certain cases,

we may ask you to verify your identity before acting on your request. Keep in mind that there may be situations where we are entitled to deny or restrict your privacy rights, for example when we need to keep certain data to comply with legal obligations, when it is necessary to establish, exercise or defend First Pack from legal claims or when your request is manifestly unfounded or excessive, in particular because of its repetitive character.

9. Children's Data

If you are under 18, please do not submit personal data without parental consent. Parents are encouraged to monitor their children's online activity.

10. Contact Us

If you have any questions about this Privacy Notice or how we process your personal data, please contact our Data Protection Officer by sending an email to privacy@firstpack.co.zw or by writing to:

Data Protection Officer

First Pack Marketing (Pvt) Ltd
127 Masotsha Ndlovu Way (Cnr Seke Rd),
Hatfield,
Harare,
Zimbabwe

11. How we may update this Privacy Notice

We may change the content of our website and how we use cookies without notice and consequently our Privacy notice may change from time to time in the future. We therefore encourage you to review this notice when you visit the website to stay informed of how we are using personal data.

Last updated: 1 December 2025