



## **Context and issues of data privacy**

### **Who are we?**

**E-Payroll (Mauritius) Ltd** (hereinafter Payroll Mauritius) is a payroll software company (hereinafter the Program or the Service or the Site).

### **What information do we collect?**

We collect standard personal data (Company Name, Business Registration Number (BRN), VAT Number, Surname, First Name, Postcode, Address, Email, Title, Telephone, Number of employees, access password to the system, IP address).

### **Why do we collect this data?**

This data is collected in order to respond to requests for information or to subscribe to the Payroll Mauritius internet service. This data is collected on the basis of consent.

### **To whom is your data communicated?**

The data is passed on to our sales, accounting and technical departments as required.

### **Where is your data stored?**

The data is stored in the EU, but also for redundancy reasons outside the EU on the territory of Mauritius.

### **What rights do you have?**

You have all your rights: right of access, rectification and erasure, right to data portability, right to limit and object to the processing of data, right not to be subject to a decision based exclusively on an automated process, right to determine the fate of data after death, right to refer to the competent supervisory authority.

### **How to exercise it?**

You may exercise these rights by writing to the following e-mail address: **dpo@payrollmauritius.com** or by post to the following address: E-Payroll (Mauritius), B83 MU, Cluny Road, Union Park 52104, Mauritius.

If, after contacting us, you believe that your rights with regard to data processing and privacy have not been respected, you may lodge a complaint with the Data Protection Office

<https://dataprotection.govmu.org/SitePages/Index.aspx>

	<b>Payroll Mauritius Privacy Policy</b>	<b>FAQEN154</b>
	<u>Prerequisites</u> : none	<b>V1.0</b>

## **The articles of our website privacy policy**

### **ARTICLE 1: PREAMBLE**

This privacy policy applies to the Payroll Mauritius public website.

This document does not apply to the website, which is accessible by clients with their access codes and passwords, nor to the Payroll Mauritius application.

The purpose of this privacy policy is to inform the users of the website of :

- How their personal data is collected and processed. What rights users have in relation to this data;
- Who is responsible for processing the personal data collected and processed;
- To whom this data is transmitted;
- The site's policy on cookies.

This privacy policy complements the site's General Terms and Conditions of Sale (CGV), the SLA and the Terms of Service.

### **ARTICLE 2: GENERAL PRINCIPLES OF DATA COLLECTION AND PROCESSING**

In accordance with the provisions of Article 5 of the European Regulation 2016/679 and the Data Protection Act 2017 of the Republic of Mauritius, the collection and processing of data of the users of the site respect the following principles:

- Lawfulness, fairness and transparency: data can only be collected and processed with the consent of the user who owns the data. Whenever personal data is collected, the user will be informed that his or her data is being collected and for what purpose it is being collected;
- Limited purposes: the collection and processing of data is carried out to respond to the user's request for information or voluntary registration in the payroll system;
- Minimisation of data collection and processing: only the data necessary for the proper execution of the purposes pursued by the site are collected;
- Conservation of data reduced in time: the data is kept for 'reasonable' without limitation as long as the subscription to the Payroll Mauritius service remains in force by the user who has given his consent (or any person entitled to it) and for a period of 5+1 years after the termination of the subscription contract;
- Integrity and confidentiality of collected and processed data: the data controller undertakes to guarantee the integrity and confidentiality of the data collected.

The legal basis for processing is the user's consent.

### **ARTICLE 3: PERSONAL DATA COLLECTED AND PROCESSED IN THE CONTEXT OF BROWSING THE SITE**

#### **A. DATA COLLECTED AND PROCESSED AND METHOD OF COLLECTION**

The personal data collected on the payrollmauritius.com commercial site is the following current data:

- Company name
- Business Registration Number (BRN)
- VAT Number



- First name ;
- Last Name; and
- Postal Code ;
- E-mail ;
- Title ;
- Address ;
- City
- Telephone number ;
- Number of employees ;
- Access password to the system ;
- IP address.

**All or part of this data is collected when the user carries out one of the following operations on the site:** Request for contact, Subscription to the payroll processing service

**The data controller will retain** all data collected in the website's IT systems, under reasonable security conditions, for an unlimited period for as long as you remain a subscriber to Payroll Mauritius's payroll processing service, unless you unsubscribe or exercise your right to rectify, update or delete your data under the aforementioned conditions, and for a period of 5+1 years following the termination of the subscription contract.

**The collection and processing of data is for the following purposes:** Responding to a request for information, subscription to the Payroll Mauritius service.

**B. TRANSMISSION OF DATA TO THIRD PARTIES**

The data is not passed on to third parties.

**C. HOSTING OF DATA**

The Payroll Mauritius website is hosted by : Google© Cloud, <https://www.google.com/about/datacenters/locations/st-ghislain/> in Belgium (EU).

The data collected and processed by the website are exclusively hosted and processed in Belgium and Mauritius.

**ARTICLE 4: DATA CONTROLLER AND DATA PROTECTION OFFICER**

**A. THE DATA CONTROLLER**

The data controller of the personal data is: E-Payroll (Mauritius) Ltd. He can be contacted by e-mail: [dpo@payrollmauritius.com](mailto:dpo@payrollmauritius.com)

**B. OBLIGATIONS OF THE DATA CONTROLLER**

The data controller undertakes to protect the personal data collected, not to transmit them to third parties without the user's knowledge and to respect the purposes for which these data were collected. The site has an SSL certificate to ensure that the information and data transfer through the site is secure. The purpose of an SSL certificate ("Secure Socket Layer" Certificate) is to secure the data exchanged



between the user and the site.

A 2048-bit HTTPS encryption and secure database storage (128-bit encryption) round off the system. In addition, the data controller undertakes to notify the user in the event of rectification, unless this would entail disproportionate formalities, costs and steps for the user.

In the event that the integrity, confidentiality or security of the user's personal data is compromised, the data controller undertakes to inform the user by any means.

**C. THE DATA PROTECTION OFFICER**

The role of the Data Protection Officer (DPO) is to ensure the proper implementation of national and supranational provisions relating to the collection and processing of personal data.

He can be contacted by e-mail: [info@payrollmauritius.com](mailto:info@payrollmauritius.com)

**ARTICLE 5: USER'S RIGHTS**

In accordance with the regulations concerning the processing of personal data, the user has the rights listed below.

In order for the data controller to comply with his/her request, the user is obliged to communicate: his/her first and last name as well as his/her e-mail address.

The data controller is obliged to respond to the user within a maximum of 30 (thirty) days.

**A. PRESENTATION OF THE USER'S RIGHTS REGARDING DATA COLLECTION AND PROCESSING**

**a. Right of access, rectification and deletion**

The user may access, update, modify or request the deletion of data concerning him/her by contacting the DPO.

**b. Right to data portability**

The user has the right to request the portability of his/her personal data, held by the site, to another site, by contacting the DPO.

**c. Right to limit and object to the processing of data**

The user has the right to request the limitation of or to object to the processing of his/her data by the site, without the site being able to refuse, unless it can be shown that there are legitimate and compelling reasons, which can prevail over the interests and rights and freedoms of the user.

In order to request the limitation of the processing of his/her data or to formulate an opposition to the processing of his/her data, the user must contact the DPO.

**d. Right not to be subject to a decision based exclusively on an automated process**

Not applicable.

**e. Right to determine the fate of data after death**

The user is reminded that he/she can organise what should happen to his/her collected and processed data if he/she dies

**f. Right to refer to the competent supervisory authority**

In the event that the data controller decides not to respond to the user's request, and the user wishes to



challenge this decision, or if he/she believes that any of the rights listed above are being infringed, he/she is entitled to refer the matter to the Data Protection Office

<https://dataprotection.govmu.org/SitePages/Index.aspx> or to any competent court.

## **ARTICLE 6: USE OF "COOKIES" FILES**

The site may use "cookie" techniques.

A "cookie" is a small file (less than 4 kb), stored by the site on the user's hard disk, containing information about the user's browsing habits.

These files enable the site to process statistics and information on traffic, to facilitate navigation and to improve the service for the user's comfort.

### **a. Opposition of the user to the use of "cookies" by the site**

The user is informed that he/she may oppose the recording of these "cookies" by configuring his/her browser.

For information, the user can find at the following addresses the steps to follow in order to configure their browser software to oppose the recording of "cookies" files:

- **Chrome™**: <https://support.google.com/accounts/answer/61416?hl=fr>
- **Firefox™**: <https://support.mozilla.org/fr/kb/enable-and-disable-cookies-website-preferences>
- **Safari™** : <http://www.apple.com/legal/privacy/fr-ww/>
- **Internet Explorer™** : <https://support.microsoft.com/fr-fr/help/17442/windows-internet-explorer-delete-manage-cookies>
- **Opera™**: <http://www.opera.com/help/tutorials/security/cookies/>
- In the event that the user decides to deactivate the "cookies" files, he/she will be able to continue browsing the site. However, any malfunction of the site caused by this manipulation could not be considered as being due to the site editor.

You can also set your browser to send a code to tell websites that you do not want to be tracked. ("Do No Track" option).

- **Internet Explorer™**: <https://support.microsoft.com/fr-fr/help/17288/windows-internet-explorer-11-use-do-not-track>
- **Safari™**: <https://support.apple.com/kb/>
- **Chrome™**: <https://support.google.com/chrome/answer/2790761?co=GENIE.Platform%3DDesktop&hl=fr>
- **Opera™** : <http://help.opera.com/Windows/12.10/fr/notrack.html>

### **b. Description of the "cookies" files used by the site**

The site editor draws the user's attention to the fact that the following cookies are used during navigation: - Google analytics

This website uses Google Analytics, a web analysis service provided by Google Inc ("Google"). Google Analytics uses cookies, which are text files placed on your computer, to help the website analyze how users use the site.

The information generated by the cookie about your use of the website (including your IP address) will be transmitted to and stored by Google on servers in the United States. Google will use this information for the purpose of evaluating your use of the website, compiling reports on website activity for website



operators and providing other services relating to website activity and internet usage. Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf.

Google will not associate your IP address with any other data held by Google. You may refuse the use of cookies by selecting the appropriate settings on your browser.

However, if you do this you may not be able to use the full functionality of this website. By using this website, you consent to the processing of data about you by Google in the manner and for the purposes set out above.

### **ARTICLE 7: CONDITIONS FOR CHANGING THE PRIVACY POLICY**

This privacy policy can be consulted at any time on the Payroll Mauritius website.

The site editor reserves the right to modify it in order to ensure its conformity with the law in force.

Therefore, the user is invited to consult this privacy policy regularly in order to be informed of the latest changes.

The user is informed that this privacy policy was last updated on: 16/11/2022.

### **ARTICLE 8: USER ACCEPTANCE OF THE PRIVACY POLICY**

By browsing the site, the user certifies that he/she has read and understood the present privacy policy and accepts its conditions, particularly with regard to the collection and processing of his/her personal data, as well as the use of "cookies" files.

### **ARTICLE 9: PERSONAL NATURE AND CONFIDENTIALITY OF LOGIN CODES**

Payroll Mauritius provides each user with a temporary login and password. These connection codes are strictly personal and confidential. You must refrain from communicating them to anyone and take all necessary measures to preserve their confidentiality.

In the event that you become aware that a third party has accessed your account, you must immediately inform Payroll Mauritius, and proceed to suspend the account, which you can then reactivate using a new password.

### **SECTION 10: COMPUTER SECURITY**

You agree not to interfere with the Payroll Mauritius Service or interrupt its normal operation. In general, you agree not to commit any act that could jeopardize the computer security of the Service.

In addition, you agree not to initiate any automated procedures of any kind on the Service, including procedures to add or retrieve information or content.

You acknowledge that you have verified that the computer configuration you are using does not contain any computer virus or malicious program and that it is in perfect working order.

### **ARTICLE 11: AGREEMENT OF PROOF**

The files, data (including connection data), messages and computerised registers kept in the computer systems of each party will be accepted as proof of the communications between them, provided that the party from which they emanate can be identified and that they are established and kept in conditions that guarantee their integrity.

In this respect, you acknowledge and agree that Payroll Mauritius' data recording tools shall serve as



evidence, in particular with regard to connection and usage data and data entered by you.

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