

## MCI's DATA PROTECTION POSITIONING STATEMENT

MCI positions **data protection** as a **core pillar of its service delivery, governance framework, and client value proposition**. As a **trusted technology partner** operating within highly regulated environments, MCI is committed to ensuring that **all personal and sensitive information** is **processed securely, lawfully, and transparently** across **all systems, solutions, and client engagements**.

MCI aligns its **data protection practices** with **applicable regulatory frameworks**, including **POPIA**, ensuring that **data is collected for legitimate purposes, minimised to what is necessary, and retained only for as long as required**. Whether acting as a **Responsible Party** or an **Operator** on behalf of **clients**, MCI implements strict controls to **safeguard data** throughout its lifecycle, from **collection and storage to processing, transmission, and secure disposal**.

Our approach is underpinned by **security-by-design** and **privacy-by-design** principles, embedded within our **software development, cloud hosting, and data management** practices. MCI leverages **secure, cloud-based** environments provided by platforms such as **Amazon Web Services** and **leading hosting providers**, ensuring that **data is protected** through **encryption (in transit and at rest), access controls, monitoring, and continuous threat detection** mechanisms.

MCI enforces **role-based access control, multi-factor authentication, and strict user governance** to ensure that **only authorised individuals** have access to **sensitive data**. Comprehensive **audit trails** and **logging mechanisms** are maintained to support **transparency, accountability, and regulatory compliance**. In addition, **all employees** are **trained** on **data protection obligations** and are required to adhere to **MCI's Internal Data Handling and Information Security Policies**.

To further strengthen its **data protection** posture, MCI applies **robust data governance practices**, including **data classification, validation, lineage tracking, and integration** with enterprise data **catalogs** where applicable. We also ensure that **all third-party service providers and sub-processors** meet stringent **data protection and security requirements** through formal **Due Diligence** and **Contractual Controls**.

MCI recognises that data protection is **not static**, and therefore maintains a culture of **continuous improvement**, regularly reviewing its **policies, controls, and technologies** to address **evolving regulatory requirements** and **emerging cyber threats**.

Through this approach, MCI provides its **clients** with the **assurance** that their data is managed with the **highest levels of integrity, confidentiality, and security**, enabling them to meet their own regulatory obligations while confidently leveraging digital transformation initiatives.

If you have any questions about your personal data, or how we protect it and make sure it stays private, please contact us here: [cara@mci.co.za](mailto:cara@mci.co.za).