

Topline Research Solutions (TRS)

Data Privacy Notice (Zimbabwe – Cyber and Data Protection Act, 2021 Compliant)

Topline Research Solutions (TRS) is committed to protecting personal information in accordance with the Cyber and Data Protection Act [Chapter 12:07] (2021) of Zimbabwe.

This Privacy Notice explains how we collect, process, store, protect, and disclose personal data in compliance with Zimbabwean law.

Who We Are

Topline Research Solutions (TRS) is a Zimbabwe-based research and insights company providing market research, social research, and advisory services with a branch in South Africa.

For purposes of the Cyber and Data Protection Act, TRS may act as:

- Data Controller – where we determine the purpose and means of processing personal data; or
- Data Processor – where we process personal data on behalf of a client (the Data Controller).

Legal Framework

This Privacy Notice is issued in accordance with:

- The Cyber and Data Protection Act [Chapter 12:07] (2021)
- Regulations and guidelines issued by the Postal and Telecommunications Regulatory Authority of Zimbabwe (POTRAZ), which serves as Zimbabwe's Data Protection Authority

Categories of Personal Data We Collect

Depending on the nature of the research project, TRS may collect:

a) Identification Data

- Name
- National ID (only where strictly necessary)
- Contact details (email, phone number)
- Age, gender, demographic information

b) Research Data

- Survey responses
- Interview transcripts
- Audio or video recordings (with consent)
- Focus group contributions
- Opinions, attitudes, and preferences

c) Technical and Online Data

- IP address
- Device information
- Cookies and browsing behaviour (for online research platforms)

d) Sensitive Personal Data (Special Categories)

Where necessary and with explicit consent, we may collect:

- Biometric data (rare and project-specific)
- Opinions (in social research contexts)

Sensitive personal data is processed strictly in line with the Act and only with lawful justification.

Lawful Basis for Processing

TRS processes personal data under one or more of the following lawful grounds:

- Informed Consent (primary basis for research participation)
- Performance of a contract
- Legitimate interests (for research quality control and methodology improvement)
- Compliance with legal obligations

Participation in research studies is voluntary unless otherwise specified in contractual arrangements.

Purpose of Processing

Personal data is processed for:

- Conducting market and social research
- Generating aggregated insights and analytical reports
- Fulfilling contractual obligations to clients
- Internal quality control and auditing
- Compliance with legal requirements

TRS does not use research data for direct marketing or commercial solicitation unless explicit consent is provided.

Research findings are presented in aggregated or anonymized format. Individual respondents are not identified in reports without express written consent.

Data Minimization and Fair Processing

In accordance with the Act, TRS ensures that personal data:

- Is collected for specified, explicit, and legitimate purposes
- Is adequate, relevant, and not excessive
- Is accurate and kept up to date
- Is retained only for as long as necessary

Data Retention

Personal data is retained only for:

- The duration of the research project
- Contractual retention requirements
- Legal or regulatory compliance obligations

After the retention period, data is securely deleted or anonymized.

Data Security Safeguards

TRS implements appropriate technical and organizational security measures, including:

- Secure servers and encrypted digital storage
- Password-protected databases
- Access control restrictions
- Confidentiality agreements for staff and subcontractors
- Secure transfer protocols
- Regular internal compliance reviews

Disclosure and Data Sharing

TRS may share personal data with:

- Clients (in anonymized or pseudonymized format)
- Contracted fieldwork partners
- IT and cloud service providers
- Legal or regulatory authorities where required by law

All third-party processors are bound by confidentiality and data protection obligations consistent with the Act.

TRS does not sell personal data.

Cross-Border Data Transfers

Where personal data is transferred outside Zimbabwe, TRS ensures that:

- The recipient country has adequate data protection safeguards; or
- Appropriate contractual safeguards are in place; or
- Explicit consent is obtained where required

Data Subject Rights

Under the Cyber and Data Protection Act, individuals have the right to:

- Be informed about the collection and use of their data
- Access their personal data
- Request correction of inaccurate or incomplete data
- Request deletion of personal data (where legally permissible)
- Withdraw consent at any time
- Object to processing under certain conditions
- Lodge a complaint with the Data Protection Authority

Complaints may be directed to:

Postal and Telecommunications Regulatory Authority of Zimbabwe (POTRAZ)
(Designated Data Protection Authority under the Act)

Children's Data

TRS does not knowingly collect personal data from individuals under 18 years without parental or guardian consent, in accordance with the Act.

Mandatory Registration Compliance

Where required by law, TRS shall ensure registration as a Data Controller with the designated Data Protection Authority and comply with all applicable regulatory requirements.

Updates to This Notice

This Privacy Notice may be updated from time to time to reflect legal or operational changes. The latest version will be made available on our official communication platforms.

Contact for Data Protection Matters

All data protection inquiries, requests, or complaints may be directed to:

Topline Research Solutions (TRS)

Email: mary@toplineres.com cc patson@topliners.co.za

Phone: 0783886038 \ 0773435564

Address: 1143 Fraser Road, Waterfalls, Harare, Zimbabwe