ZIMBABWE STARTUP FOUNDERS ASSOCIATION

Privacy Notice

How ZISFA collects, uses, shares and protects the personal information of its members, applicants, officers, partners and website visitors.

Version 1.0
November 2026

Applies to
www.zisfa.org, the member platform, forms, events and e-mail

Governed by
Cyber and Data Protection Act [Chapter 12:07]

In short

- We collect only what we need to admit members, keep the register, run programmes and meet our legal duties.
- Information about members and their startups, including financial information and pitch materials, is confidential (Article 50).
- You appear in the member directory, or in our stories and promotions, only if you say yes. You can change your mind at any time.
- Data we publish about the ecosystem is anonymised unless you consent (Article 43).
- We never sell personal information, and we use no advertising or tracking cookies.
- You can ask to see, correct or delete your information, and complain to POTRAZ, the Data Protection Authority.

01 Who we are

The Zimbabwe Startup Founders Association (**ZISFA**, "we", "us") is a company limited by guarantee registered in Zimbabwe, with its registered office in Harare. It exists for the benefit of startup founders in Zimbabwe: to build their skills, support the shared growth of their businesses, recognise excellence, represent their interests, engage funders and partners, support early-stage startups through catalytic funding, and promote the formation of a separate founders' savings and credit co-operative (Memorandum, clause 3).

ZISFA is the **data controller** for the personal information described in this notice: we decide why and how it is used. Our Data Protection Officer oversees how we handle it and answers privacy requests (see **section 14**).

02 Who this notice covers

This notice applies to anyone whose personal information ZISFA holds: **visitors** to www.zisfa.org; people who **register interest** or send a **partner enquiry**; **applicants** for membership; **founder, founding and associate members**; **Directors, the Secretary and other officers**; members of the **verification panel**, the **catalytic fund committee** and other committees; **mentors, judges and partner contacts**; and people who attend our **events**.

03 The information we collect

Most of it comes from you. Some is created as you use the platform (for example, sign-in records), and some comes from officers carrying out the Association's work (for example, the Directors' decision on an application).

WHO	WHAT WE COLLECT	WHY WE NEED IT
Website visitors	Technical details your browser sends, such as your IP address and browser type, kept in our server logs. If you use a form: your name, e-mail address, phone number, organisation or startup, and your message.	To keep the site working and secure, and to reply to you.
Everyone with an account	Name, e-mail address, mobile number, password (stored only in a scrambled, one-way form we cannot read), two-factor authentication settings, an optional profile photo (we remove any location data from it), and the date, time, IP address and device of each sign-in.	To give you secure access and to detect misuse.
Applicants	Your full legal name, address, country of residence and mobile number. **Founder applicants:** your startup's name, website, sector and activities, your role and ownership stake, its launch date, and the evidence required by Article 3.6 (for example company registration and shareholding records, customer, user or revenue figures, and accelerator, grant, investment, award or intellectual-property documents). **Associate applicants:** your background, organisation and how you support the Association's objects. A record of the documents you accepted, with the date, IP address and browser.	To decide your application under Articles 2 and 3, and to record your undertaking to comply with the Memorandum and Articles (Article 2.2(b)).
Members	Your entry in the register of members: name, address, class of membership, startup, date of admission and date of leaving (Article 2.5). The history of any change of class or status, with its authority and reasons. Fees and subscriptions paid. The profile details and consents you choose to give. Event registrations and attendance, and your part in trainings, mentorship, investment-readiness reviews, competitions, recognition and the Catalytic Fund.	To keep the statutory register, collect fees, give notices, determine voting eligibility and deliver programmes.
Officers and committee members	Appointments, declarations of interest (Article 36), confidentiality undertakings (Article 50), and the decisions, recommendations and minutes you take part in (Article 47).	To show that decisions were properly made, and to manage conflicts of interest.
Event attendees	Registration details, attendance, and photographs or video taken at events.	To run events and, with consent, to report on them.

We do not ask for sensitive information such as health, religion, political opinions or biometric data. Please do not include it in applications or evidence unless it is essential.

04 How we use it, and our lawful basis

We use personal information only for the Association's purposes (Article 50), and only where the Cyber and Data Protection Act allows it.

PURPOSE	LAWFUL BASIS
Running your account and keeping the platform secure	Necessary to provide the service you asked for; our legitimate interest in protecting members' information and preventing fraud and misuse.
Assessing applications: completeness, verification panel review, the Directors' decision, written reasons and appeals	Necessary to take the steps you asked for before admission; required by Articles 2.3 and 3.6.
Keeping the register of members and other statutory registers	Legal obligation (Articles 2.5 and 49; the Companies and Other Business Entities Act).
Fees and subscriptions, accounting records and the annual audit	Necessary for your membership (Article 56.2); legal obligation (Article 48).
Notices of meetings, voting, and good-standing checks	Necessary for your membership; required by Articles 7, 16 and 51 to 53.
Trainings, mentorship, events, recognition, competitions and the Catalytic Fund	Necessary to deliver the programmes you take part in (Articles 38 to 44).
The member directory, featuring your business, stories, your logo, photographs	**Your consent**, which you can withdraw at any time (Article 41).
Ecosystem data and advocacy	Our legitimate interest in representing founders (clause 3(d), Article 43). Published data is anonymised and states its source and date; you are named only with your consent.
Replying to enquiries and interest registrations	Your request; our legitimate interest in answering it.
Keeping an audit trail of who saw and changed records	Our legitimate interest in accountability and security; evidence of proper decisions.

No decision about your membership is made by a computer alone. The platform checks that an application has the evidence Article 3.6 requires, but people decide: the Secretariat checks completeness, the verification panel recommends, and the Directors decide.

05 Confidentiality

Information about members and their startups, including financial information and pitch materials, is **confidential**. It is used only for the Association's purposes, and published only in anonymised form or with consent (Article 50).

- **Application evidence** is seen only by the Secretariat, the three-member verification panel assigned to your application, and the Directors. Panel members must declare any conflict of interest before they can see it, and a conflicted member is replaced.
- Directors, committee members and judges sign a **confidentiality undertaking** (Article 50).

- Each person sees only what their role needs. Every time an officer opens an application or one of its files, the platform records it.

06 Your choices and consent

Some uses happen only if you agree, and each is asked for separately. You can give or withdraw each one in your account, or by contacting us:

- **Member directory:** whether you are listed, and which profile details members or the public can see. The directory is off until you turn it on.
- **Stories and promotion:** featuring you or your business in our channels and partner media, using your logo, and promoting your products.
- **Photographs:** using photographs or video of you from our events. You can also tell the photographer on the day.
- **Data use:** being named, rather than anonymised, in data the Association publishes.

Withdrawing consent stops future use. It does not undo use that was lawful before you withdrew it, such as a report already published.

07 Who we share it with

We never sell personal information. We share it only as follows:

RECIPIENT	WHAT AND WHY
Service providers	Companies that run parts of our service for us, under contract and only on our instructions: **Contabo GmbH** (hosting; our servers are in Germany), **Zoho ZeptoMail** (sending e-mails such as sign-in links, notices and decisions) and **NardoPay** (online payment of fees). When you pay online you enter your payment details on NardoPay's page; we receive confirmation of the payment, not your card or mobile-money details.
Mentors, judges and programme partners	Only what a programme you join needs, for example your competition entry to its judges. We tell you before this happens.
Our auditor and advisers	The auditor appointed by the annual general meeting (Article 48.5), and our legal advisers, under a duty of confidentiality.
Authorities	The Registrar of Companies, the Data Protection Authority, courts or law-enforcement agencies, where the law requires it.
Funders and partners	Anonymised and aggregated information only, unless you consent to be named.
ZISFA SACCO	A separate co-operative society; membership is voluntary and separate (Article 45). We do not pass your information to it without your consent.

08 Information stored outside Zimbabwe

Our platform runs on servers in **Germany**, where the European Union's General Data Protection Regulation gives personal information a high level of protection. Our e-mail provider may also process e-mail addresses and message content outside Zimbabwe. We transfer information only to providers bound by contract and by law to protect it to a standard at least equal to Zimbabwean law, as the Cyber and Data Protection Act requires. If we move the platform, for example to hosting in Zimbabwe, we will update this notice.

09 How long we keep it

RECORD	HOW LONG
Register of members, current and former members	Permanently, as the statutory register.
Governance records: notices, minutes, resolutions and votes	Permanently.
Refused or withdrawn applications and their evidence	Two years after the decision or the final appeal, then deleted.
Admitted members' application evidence	For the duration of membership, plus two years.
Fees, subscriptions and Catalytic Fund financial records	For the period the law requires for financial records.
Audit trail of activity on the platform	Seven years.
Event registrations and attendance (other than general meetings)	Two years.
Interest registrations and partner enquiries	Until the matter is closed, then two years.

When a period ends we delete the information, or anonymise it so that it no longer identifies anyone.

10 How we protect it

- All connections to www.zisfa.org and the platform are encrypted (HTTPS).
- Passwords are stored only in a one-way scrambled form. Directors, officers and administrators must use two-factor authentication.
- Files are kept in private storage, checked for viruses when uploaded, and only ever shown after the platform checks who is asking.
- Access follows each person's role, and officers cannot act on records that concern themselves.
- An audit trail records important actions and cannot be edited or deleted through the platform.
- We keep backups and test that we can restore them.

If a breach puts your information at risk, we will tell the Data Protection Authority and, where required, you, as the Cyber and Data Protection Act requires.

11 Your rights

Under the Cyber and Data Protection Act you have the right to:

Be informed
about how we use your information, as this notice does.

Access
a copy of the information we hold about you.

Correction
of information that is wrong or incomplete. You can update most of it yourself in your account.

Deletion
of information we no longer need, except records the law requires us to keep, such as the register of members.

Object
to uses based on our legitimate interests, and ask us to restrict use while a concern is resolved.

Withdraw consent
at any time, for any use that depends on it.

Making a request is free. We may ask you to confirm who you are, and we aim to reply within 30 days. If you are unhappy with our answer, you may complain to the **Postal and Telecommunications Regulatory Authority of Zimbabwe (POTRAZ)**, the Data Protection Authority.

12 Cookies

We use only cookies the platform needs to work: one keeps you signed in during a visit (or longer if you tick “Keep me signed in”), and another protects forms from being submitted by other websites. We use **no advertising, analytics or third-party tracking cookies**, so we do not ask you to accept any.

13 Young people and changes to this notice

Our services are for adults. We do not knowingly collect information about anyone under 18 without the consent of a parent or guardian.

When this notice changes, we publish the new version on the platform with its version number and date, and tell members by e-mail or through the platform (Articles 51 to 53). Applicants accept the version in force when they apply.

14 Contact us

For any question about your information, or to use your rights, write to our Data Protection Officer. Please put “Privacy request” in the subject line.

E-MAIL
info@zisfa.org.zw

POST
Data Protection Officer
Zimbabwe Startup Founders Association
Harare, Zimbabwe

Approved by the Directors. Version 1.0, effective from 13 November 2026.