

Privacy Notice: Conflict of Interest & Code of Ethics Declaration

As part of MTN Ghana's commitment to ethical conduct and regulatory compliance, we collect certain personal data during the Conflict of Interest (COI) and Code of Ethics (COE) declaration process.

Personal Data We Process

- Identification details (e.g., name, staff ID, department)
- Declaration responses related to perceived, potential or actual conflicts.

Why We Process This Information

- To assess and manage potential conflicts of interest
- To uphold MTN Ghana's Code of Ethics and ensure compliance with internal policies and legal obligations.

Our Legal Grounds for Processing

- **Legal Obligation:** MTN Ghana is required under governance and regulatory frameworks to identify and manage conflicts of interest and uphold ethical standards.
- **Legitimate Interest:** We also have a business interest in promoting transparency, integrity, and trust across the organization.

Third-Party Platform

This declaration is submitted via a secure third-party platform contracted by MTN Ghana. The provider is bound by data protection obligations.

To exercise your rights or learn more about how your data is processed as an employee and director, please refer to the full **Employee Privacy Notice** here:

 [View Full Employee Privacy Notice \(MTN Ghana Data Privacy Employee Notice 2023\)](#)