

# HOW TO REGISTER AS A DATA CONTROLLER

A simple step-by-step guide for NGOs & CSOs

Cyber and Data Protection Act [Chapter 12:07] • POTRAZ Guideline CDPG1 of 2025



## WHO MUST REGISTER?

If your NGO collects data on staff, members, beneficiaries, donors, volunteers or website visitors, you are likely a **Data Controller** and must register — unless exempt (personal use, law enforcement, or journalism/archival work).

1



### Check if you are a Data Controller

Do you decide what personal data to collect, why, and how it is used?  
If yes, you likely need to register.

2



### List your data subjects & personal data

Note whose data you hold (staff, members, beneficiaries, donors, volunteers) and what you collect (names, contacts, ID numbers, etc.)

3



### Flag any sensitive personal data

Health records, biometric data, religious/political beliefs, or criminal records need special care and must be declared.

4



### Check for data transfers abroad

Note if any personal data is sent, stored, or processed outside Zimbabwe — a separate authorisation is required for this.

5



### List your risks & safeguards

Identify risks to the data you hold (e.g. unauthorised access) and the measures you use to protect it (passwords, locked cabinets, access control).

6



### Work out your Licensing Tier & fee

Count your data subjects to find your tier and fee — see the table below.

7



### Complete & submit Form DP1

Fill in the Application/Renewal Form (First Schedule) and submit it to POTRAZ with your fee and required documents (e.g. certificate of incorporation).

8



### Wait for POTRAZ's decision

POTRAZ has 14 days to approve, reject, or request more information.

9



### Appoint a DPO & renew annually

Appoint a Data Protection Officer (Tier 1 may be exempt) and renew your licence every 12 months to stay compliant.

## LICENSING TIERS & FEES

### Tier 1

50 – 1,000 data subjects

**\$50**

### Tier 2

1,001 – 100,000 subjects

**\$300**

### Tier 3

100,001 – 500,000 subjects

**\$500**

### Tier 4

500,000+ subjects

**\$2,500**



**The registration deadline (12 March 2025) has passed — register now.**

Non-compliance is an offence: fines up to Level 11 and/or up to 7 years imprisonment.

### NANGO Compliance Support

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### POTRAZ – Data Protection Authority

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