



PRIVACY AND SECURITY STATEMENT.

ELEVATE CREDIT LIMITED.

Who We Are

We Elevate Credit Africa [Wallet. Mind .Spirit.], are at the core of our existence, have a common commitment to advance you financially through our wide range of unique and tailored financial products to meet your exact needs. In so doing, we are committed to protecting and respecting the privacy of our customers. This Privacy Notice applies to all persons using our services or website.

1.0 Purpose and Scope of This Statement.

Elevate Credit Africa acknowledges the expectations of its customers with regard to privacy, confidentiality and security of their personal information that is entrusted with us.

- 1.1 Elevate Credit Africa establishes this Privacy Statement for the purposes of compliance with the applicable data protection laws in Kenya.
- 1.2 This Privacy Notice sets out our standards, procedures and policies towards the access and use of any personal data, or any other information provided from you or any other sources to us.
- 1.3 Please read our Terms and Conditions ["Terms"], which details the terms under which you access and use Digital Credit Financial Services.
- 1.4 Keeping personal information of customers secure and using it solely for activities related to our services and preventing any misuse therefore, is a top priority of Elevate Credit Africa. We have espoused this Privacy Statement with the aim of protecting the personal information/data entrusted and disclosed by our customers.
- 1.5 This Privacy Notice governs our data collection, processing and usage of your data and it sets out your choices regarding use, access and correction of your personal information.

2.0 Definitions

- 2.1 **‘Bio data’** means Biographical information i.e., Personal information with regard to gender, nationality, contact information, physical location, and any other.
- 2.2 **“Data Controller”** means the natural or legal person, authority, organization or other agency that makes decisions individually or together with other parties regarding the purposes and means for processing Personal Data.
- 2.3 **“Data Protection Act”** means the Data Protection Act No. 24 of 2019 under the laws of Kenya as amended.

2.4 “**Personal Data**” means any information identifying you or information relating to you that we can identify [directly or indirectly] from that data alone, or in combination with other identifiers we possess or can reasonably access. Personal Data excludes anonymous data or data that has had the identity of you as an individual permanently removed.

2.5 “**Data Processor**” means a natural or legal person, authority, organization or other agency that processes Personal Data on behalf of the Data Controller.

2.6 “**Responsible Person**” means Data Protection Officer.

3.0 Personal Information And Type [S] Of Personal Data We Collect.

3.1 Personal Information refers data from which you can be identified. Elevate Credit Africa collects the following information from our customers;

- a. **Identification data;** includes name, username or similar identifier, Identity card/Passport number, KRA PIN number, Passport size photo, marital status, signature, race, nationality, age, title, date of birth and gender, next of kin details and any other similar social information.
- b. **Contact data;** which includes billing address, postal address, physical address, email address and telephone number [s].
- c. **Financial data;** which may comprise bank account details, wallet details, card payment details and other electronic or non-electronic payment details.
- d. **Transaction data;** which includes details about payments to and from you and other details of products and financial services you have acquired from us.

- e. **Technical data;** which includes internet protocol (IP) address, your login identity data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access our systems.
- f. **Profile data;** which includes your profile identification information, wallet information, your product interests, financial preferences, and feedback and survey responses.
- g. **Usage data;** which includes information about how you use our website, products and financial services.
- h. **Marketing and communications data; which** should you opt-in in to receiving marketing information from us and your communication preferences.
- i. **Customer support or Communication data;** including means of reach and how to contact you so we can provide you with customer support.

4.0 We are required to receive or collect some personal information to operate, provide, improve, understand, customize, support, and market our services. This also includes when you apply for, install our Wallet, access, or use our services. The type of information we receive and collect depend on how you use our Services.

5.0 How We Collect Your Personal Information.

We will collect and process data about you from the following sources:

- 5.1 The information you provide us: This is information about you that you give us by manually by filling in application form [s] that we give to you or by corresponding with us by phone, e-mail or otherwise.

- 5.2 We use different methods to collect data from and about you including through direct interactions. This includes the personal data you provide when you:
- a. apply for our products or services;
 - b. open an account/ Wallet (s) with us;
 - c. subscribe to our services or publications;
 - d. download our mobile wallet application;
 - e. request marketing information to be sent to you;
 - f. enter a competition, promotion or survey; or
 - g. Give us feedback or contact us.
- 5.3 Information we collect about you: With regard to each of your user visits to our Website and your use of the Online and Wallet Services, we will automatically collect the following information:
- 5.4 Technical information, including the Internet protocol (IP) address used to connect your computer or mobile phone to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform. We collect this personal data by using cookies, server logs and other similar technologies. We may also receive technical data about you if you visit other websites employing our cookies;
- 5.5 Information about your visit, including the full Uniform Resource Locators [URL], clickstream to, through and from our site [including date and time], financial products you viewed or searched for' page response times, download errors, length of visits to certain pages, page interaction information [not limited to scrolling,

clicks, and mouse over], methods used to browse away from the page and any phone number used to call our customer service number.

- 5.6 Service providers [including payment processors, card network providers, debt collection, tracing agencies, credit agencies, electronic communication service providers, public data and private data verification providers, including data registries.
- 5.7 Employer, advisers, and our business partners.
- 5.8 Government departments, regulatory authorities, courts of law and enforcement agencies and tax authorities such as Integrated Personal Registration Systems [IPRS], Kenya Revenue Authority [KRA], National Transport and Safety Authority [NTSA] database.
- 5.9 Providing your personal information to us is usually voluntary. However, it may be mandatory under certain circumstances, for example when you apply for financial services or to comply with Anti-Money laundering/ combating the Financing of Terrorism [AML /CFT] Legislation. In the event, you fail to provide us with your personal information when requested, we may not be able to provide the financial services to you or comply with our legal obligations.
- 5.10 Whenever you provide us with the personal information of third parties, you must inform them of the need to disclose their personal information to us. We will process the information in accordance with this statement.
- 5.11 We may collect information about you from other publicly accessible sources not listed above. We may also need to collect information about you from trusted

partners, not listed above, who provide us with information about potential customers of our products and services.

6.0 Why We Process Your Personal Information.

Our responsibilities to you are very important to us and we aim to provide you with personalized financial services to meet your needs. We may process your personal information for any of the reasons outlined under Section 7 of this Privacy Statement.

6.1 Contractual Requirements.

We may need to process your personal information if we require it to conclude or perform a contract or agreement with you for a financial service that you have applied for either with us.

- a. Our Financial services to you that involve opening and maintaining your account, executing transactions and administering claims where applicable.
- b. Collecting payments due to us by you, managing our risks and maintaining our overall relationship with you.
- c. Communicating with you regarding the products or services you have with us.
- d. Providing you with further information that you request from us regarding the products or services you have with us.

6.2 Lawful Obligation

We may need to process your personal information for the following purposes:

- a. To complete integrity and business conduct checks required for compliance purposes including due diligence and onboarding processes, monitoring and assurance reviews and conduct sanctions screening against any sanctions lists.
- b. To comply with other risk management, regulatory and legislative requirements.

- c. To comply with voluntary and mandatory codes of conduct.
- d. To detect, prevent and report theft, money laundering, terrorist financing, corruption or other potentially illegal activity, or activities that could lead to loss.
- e. To process, settle transactions and payments.
- f. To conduct research and analysis [which may include assessing product suitability, credit quality, insurance risks, market risks and affordability, developing digital credit models and tools and obtaining related information].

6.3 Legitimate Interest.

Elevate Credit Limited may process your personal information in the regular management of its business and to protect the interests of the digital finance market and its company, clients, shareholders, employees and other third parties, including our business partners and members of the general public. Elevate Credit Africa may process your personal information in order to:

1. Maintain, monitor, improve and develop our business policies, systems and controls;
2. Maintain and improve data quality;
3. Design, develop and test products, services and solutions for clients, which may include combining sources and types of your personal information across multiple legal entities and countries, subject to compliance with applicable laws and for the reasons below;
 - a. Personalize and customize products, services and solutions, messaging and advertising;
 - b. Respond to client enquiries and communications and to record these interactions for the purpose of analysis and improvement;
 - c. Manage business emergencies;
 - d. Process and settle transactions and payments;
 - e. Meet record-keeping obligations;

- f. Conduct research and analysis [among other things, to assess credit quality, market risks and affordability, to conduct behavioral profiling, to develop credit models and tools and to obtain related information];
- g. Achieve other related purposes.

7.0 **Whom We May Disclose Your Information**

7.1 We may disclose your Personal Data to other entities with the affiliates of Elevate Credit Africa, for legitimate business purposes [not limited to providing services to you and operating our websites and systems], in accordance with applicable law.

Additionally, we may disclose your Personal Data to:

7.2 The Government [including law enforcement] authorities and regulators e.g. Central Bank of Kenya and Data Protection Commissioner.

7.3 Other financial institutions through which your transactions are processed.

7.4 Other companies and financial institutions that we collaborate with, to provide services to you such as credit card service providers, mobile technology service providers, credit reference bureaus, employers, debt collection agencies and outsourced services vendors or suppliers.

7.5 Third parties with accruing legal obligations such as trustees and executors, guarantors, anyone holding a power of attorney to operate a Wallet account on your behalf and joint Wallet account holders.

7.6 In the instance of a merger or acquisition. If a change happens to our business, the new owners may use your Personal Data in the same way as set out in this Privacy Statement. Third parties who are service providers acting as data processors,

professional advisers including lawyers, bankers, and those who provide consultancy, banking, legal, insurance, audit and accounting services.

7.7 Please note that third parties are required to protect the security of your Personal Data and to treat it lawfully. We do not allow our third-party service providers to use your Personal Data for their own interests instead, we only allow them to process it for certain purposes and according to our laid down procedures and policies.

8.0 Who We Share Your Personal Data With

8.1 We may need to transfer or store your information in another jurisdiction to fulfill a legal obligation, for our legitimate interest and to protect the public interest.

8.2 If the other jurisdiction does not have the same level of protection for Personal Data, when we do process the data, we shall put in place appropriate safeguards for instance through contractual commitments to ensure the data is adequately protected.

8.3 We ensure your Personal Data is protected by requiring all our related companies to follow the same rules, policies and procedures when processing your Personal Data.

9.0 Consent.

9.1 In addition to the reasons given above, Elevate Credit Africa may process your personal information where we have your specific consent for a defined purpose. We will also seek your consent where the applicable laws require it.

10.0 How we communicate with you

10.1 Besides in-person communication, we use a wide variety of channels to engage with you regarding your existing credit financial services and to keep you updated.

They include;

- a. SMS, email, phone calls, automated calls;
- b. Notifications sent to your mobile device and in-wallet notifications;
- c. The rationale is to keep you apprised on any ongoing operational basis about your existing financial services and their new features, especially where we are making them more secure and as we make the provision of credit financial facilities more convenient for you.
- d. We may contact you through these means for research purposes or to communicate with you for marketing of new products or services as explained in greater detail below.

11.0 **How is your personal information protected?**

11.1 Elevate Credit Africa has established appropriate security measures, procedures and rules to prevent your Personal Data from loss, used or accessed in an unauthorized way, altered or disclosed. In addition, we limit access to your Personal Data to the employees, agents, contractors and other third parties. They will only process your Personal Data on our instructions, and they are subject to a duty of confidentiality.

11.2 We have set up procedures to deal with any suspected personal data breach and will notify you and the relevant regulator of a breach where we are legally required to do so.

11.3 The collection of your personal data shall be convenient, relevant and restricted to the precise minimum. Before processing personal data, we will determine whether and to what extent the processing of personal data is necessary to achieve the purpose for which it is performed.

11.4 We require the same level of security, procedures and rules to be implemented by our service providers and other third parties. However, you must not share or send us any personal information through unauthorized platforms, as these are not a secure way of communication and carry a risk of interception and unauthorized access. You should only share personal information through our authorized platforms of communication.

12.0 Change of Purpose

12.1 We will only use your Personal Data for the purposes for which we collected it as indicated in this Privacy Statement or for reasons we give you during the collection of the data.

12.2 If we need to use your Personal Data for an unrelated purpose, we will notify you and seek your consent where necessary.

13.0 Data Retention Policy

13.1 Elevate Credit Africa will only retain your Personal Data for as long as is reasonably required to fulfil the purpose for which it was obtained, including any legal, regulatory, tax, audit and accounting, or reporting obligations.

13.2 In the case of a complaint or if we reasonably believe there is a risk of litigation arising from our engagement with you, we may preserve your Personal Data for a longer length of time.

- 13.3 To determine the appropriate retention period for Personal Data, we consider the amount, nature and sensitivity of the Personal Data, the potential risk of harm from unauthorized use or disclosure of your Personal Data, the purposes for which we process your Personal Data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.
- 13.4 We are required to retain basic information about our customers [including contact, identity, financial and transaction data] for a minimum of seven [7] years after they cease being customers. Our internal policy as amended from time to time may also require us to keep customer data for a longer period.
- 13.5 In some circumstances, we will de-identify your Personal Data [so that it can no longer be associated with you] for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

14.0 How Do We Use Your Personal Information For Marketing?

- 14.1 We endeavor to ensure your consent regarding certain personal data uses, specifically in so far as marketing and advertising. We have established the following personal data control mechanisms:
- 14.2 **Promotional offers** from us: We may use your identity, contact, technical, usage and profile data to form a view on what we think you may want or need, or what may be of interest to you. This is the means by which we decide which products, services and offers may be relevant to you. You will receive marketing communication from us if you have requested such information and provided

express consent to receiving such information based on the use of our products and services.

14.3 Opting Out

14.3.1 You can ask us to stop sending you marketing messages at any time by writing to us or logging into the relevant website and checking or unchecking relevant boxes to adjust your marketing preferences or by following the opt-out links on any marketing message sent to you or by contacting us.

14.3.2 Where you opt-out of receiving these marketing messages, this will not apply to Personal Data provided to us as a result of product or service subscribed to, warranty registration, product or service experience or other transactions

14.4 Know Your Rights

Elevate Credit Africa values your trust and wants you to be familiar with your rights under the legislation as well as know how you can exercise them in your interactions with Elevate Credit Africa. You have the right to;

14.5 Access the personal information we hold about you, to correct and update your information;

14.6 Object to the processing your personal information, where applicable;

14.7 Request that we delete your personal information where appropriate;

14.8 To transmit your data to another data controller or data processor without any hindrance and where technically possible, to have your data transmitted directly to another data controller or processor.

- 14.9 To be notified that your personal information is being collected by us or has been accessed or acquired by an unauthorized person;
- 14.10 Object to the processing of personal information for the purposes of direct marketing.
- 14.11 Not to be subjected to automated decision-making processes in respect of an application for credit financial services, except under certain circumstances;
- 14.12 To request reasons from us in the event your application for financial credit services is refused.

15.0 Use of cookies on our website.

‘Cookie’ is a small text file that is stored on your computer, smartphone, tablet or other device when you visit a website or use an application. It helps to distinguish you from other users and contains specific information related to your use of our website or application, such as your login details and your preference settings, and helps the website or the application to recognize your device.

- 15.1 Cookies help to make a website or app function better and make it easier for us to give you a better user experience on our online channels. To use or store cookie types that are not required for the functioning of the website or app and are optional, we will obtain your consent first.

15.2 For this reason, we limit our use of cookies to:

- a. Providing products and financial services that you request;
- b. Delivering advertising through marketing communications;
- c. Providing you with a better online experience and tracking website performance;
- d. Helping us make our website more relevant to you.

We use the following types of cookies on our online channels, such as our website.

15.3 Strictly necessary cookies

These cookies are mandatory and are required for the effective operation and functioning of our website on your device. They enable you to use the website and the features on the website and cannot be switched off.

15.4 Performance cookies

These are optional cookies that collect information about how you use the website but not any personal information. Performance information is anonymous and mostly statistical and is used to improve the performance of our website.

15.5 Marketing cookies or advertising cookies

These cookies are also optional and are used to deliver and display advertisements that are relevant and engaging for you as the user. They help us measure how effective our advertising campaigns are by your interaction with the advertisement.

15.6 Session cookies

These cookies are temporary and optional and only exist while you browse our website to remember your activities on the website. As soon as you close the website or move to a different website, the cookies are deleted.

15.7 Persistent cookies

These are permanent, optional cookies that are stored on your device until they reach a set expiry date or until you delete them. They remember your preferences or actions on our website [or in some cases across different websites]. We may use them for various reasons, for example to

remember your preferences and choices when you use our website, or to display relevant advertising campaigns to you.

15.8 First-party cookies

These are cookies that we create and store when you use our website and relate to information obtained directly from you.

15.9 Third-party cookies

These cookies are owned and created by a third party that provides a service to us such as social media sharing, website analytics or content marketing. These cookies are intended to collect information directly from you by us and we share the personal information with the third party through the cookies that the third party stores on our website.

Where we use cookies to collect personal information, it will always be done in accordance with this statement. You can stop your browser from accepting cookies, but if you do, some parts of our websites or online services may not work properly. We recommend that you allow cookies.

16.0 Use of Social Media

- a. When you engage with us through our social media accounts, your personal information may be processed by the social media platform owner.
- b. This process is outside our control and the processing activities may be in a country outside Kenya that may have different data protection laws.
- c. For more information about the privacy practices of a social media platform, please refer to and read the terms and conditions of that social media platform before you use it or share any personal information on it.

- d. Our social media accounts are not the most appropriate forums to discuss our clients' products or financial arrangements. We will never ask you to share personal, account or security information on social media platforms. We may, however, ask you to message us in private through one of our official social media accounts.

17.0 General

- 17.1 We may change this statement from time to time in accordance with any introduction of new products, services or regulatory requirements.
- 17.2 We may need to request specific information from you to help us confirm your identity and ensure your right to access your Personal Data [or to exercise any of your other rights]. This is a security measure to ensure that Personal Data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.
- 17.3 We strive to respond to all legitimate requests within reasonable time. Occasionally, it may require ample time so as sufficiently to acknowledge your request, if it is specifically complex or you have made a number of requests. In this case, we will notify you and keep you apprised of the progress. The latest copy of this statement is available on <https://elevatecredit.africa/elevate-credit-data-protection-and-privacy-policy-statement/>.
- 17.4 Should you have any queries relating to the processing of your personal information by Elevate Credit Limited, please contact our Data Protection Officer at dpo@elevatecredit.africa.

Contact of our Data Protection Officer:

dpo@elevatecredit.africa

**Elevate Credit Limited
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List of applicable sources of Elevate Credit Limited Legislation

1. Data Protection Act, No. 24 of 2019, Laws of Kenya.
2. The General Data Protection Regulation – GDPR [EU] 2016/679.

