

## **PRIVACY POLICY**

Last updated February 11, 2019

Thank you for choosing to be part of our community at Mwananchi Credit Limited, doing business as Mwananchi Credit (“Mwananchi Credit”, “we”, “us”, or “our”). We are committed to protecting your personal information and your right to privacy. If you have any questions or concerns about our policy, or our practices with regards to your personal information, please contact us at [info@mwananchicredit.com](mailto:info@mwananchicredit.com)

When you visit our website <http://mwananchicredit.com/>, and use our services, you trust us with your personal information. We take your privacy very seriously. In this privacy notice, we describe our privacy policy. We try to explain to you in the clearest way possible what information we collect, how we use it and what rights you have in relation to it. We hope you take some time to read it through it carefully, as it is important. If there are any terms in this privacy policy that you do not agree with, please discontinue use of our site and services.

This privacy policy applies to all information collected through our website (such as <http://mwananchiredit.com/>), and/or any related services, sales, marketing or events (we refer to them collectively in this privacy policy as the “sites”).

Please read this privacy policy carefully as it will help you make informed decisions about sharing your personal information with us.

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### **1.WHAT INFORMATION DO WE COLLECT?**

#### **Personal information you disclose to us**

*In short; We collect personal information that you provide to us such as name address, contact information, passwords and security data, payment information and social media login data.*

We collect personal information that you provide to us when registering at the sites expressing an interest in obtaining information about us or our products and services, when participating in activities on the sites or otherwise contacting us.

The personal information that we collect depends on the context of your interactions with us and the sites, the choices you make and the products and features you use. The personal information we collect include the following:

**Name and contact data.** We collect your first and last name, email address, postal address, phone number and other similar contact data.

**Credentials.** We collect passwords, passwords hints and similar security information used for authentication and account access.

All personal information that you provide to us must be true, complete and accurate, and you must notify us of any changes to such personal information.

### **Information automatically collected**

*In short: Some information – such as IP address and/or browser and device characteristics – is collected automatically when you visit our sites.*

We automatically collect certain information when you visit, use or navigate the sites. The information does not reveal your specific identity (like your name or contact information) but may include device and usage information, such as your IP address, browser and device characteristics, operating system, language preferences, referring URLs, device name, country, location, information about how when you use our sites and other technical information. This information is primarily needed to maintain the security and operation of our Sites, and for our internal analytics and reporting purposes.

Like many businesses, we also collect information through cookies and similar technologies.

### **Information collected from other sources**

*In short; We may collect limited data from public databases, marketing partners, social media platforms, and other outside sources.*

We may obtain information about you from other sources, such as public databases, joint marketing partners, social media platforms (such as Facebook & Instagram), as well as from other third parties.

Examples of information about you we collect from other sources include: social media profile information (your name, gender, birthday, email, current city, country, user identification numbers for your contacts, profile picture, URL and other information that you choose to make public); marketing leads and search results and links, including paid listings (such as sponsored links).

## **2. HOW DO WE USE YOUR INFORMATION?**

*In short: We process your information for purposes based on legitimate business interests, the fulfilment of our contract with you, compliance with our legal obligations, and/or your consent.*

We use personal information collected via our sites for a variety of business purposes described below. We process your personal information for these purposes in reliance on our legitimate business interests (“Business Purposes”), in order to enter into or perform a contract with you (“Contractual”), with your consent (“consent”), and/or for compliance with our legal obligations (“Legal Reasons”). We indicate the specific processing grounds we rely on next to each purpose listed below.

We use the information we collect or receive:

- To facilitate account creation and logon process with your consent. If you choose to link your account with us to a third-party account \*(such as your Google or Facebook account), we use the information you allowed us to collect from those third parties to facilitate account creation and logon process. See the section below headed “HOW DO WE HANDLE YOUR SOCIAL LOGINS” for further information.
- To send you marketing and promotional communications for Business Purposes and/or with your consent. We and/or our third-party marketing partners may use the personal information you send to us for our marketing purposes. If this is in accordance with your marketing preferences. You can opt-out of our marketing emails at any time (see the “WHAT ARE YOUR PRIVACY RIGHTS” below).
- To send administrative information to you for Business Purposes. We may use your personal information to send you product, service and new feature information and/or information about changes to our terms, conditions and policies.
- Fulfill and manage your orders for contractual reasons. We may use your information to fulfill and manage your orders, payments, returns and exchanges made through the Sites.
- To post testimonials with your Consent. We post testimonials on our Sites that may contain personal information. Prior to posting a testimonial, we will obtain your consent to use your name and testimonial. If you wish to update, or delete your testimonial, please contact us at info@mwananchicredit.com and be sure to include your name, testimonial location and contact information.
- Deliver targeted advertising to you for our Business Purposes and/or with your consent. We may use your information to develop and display content and advertising (and work with third-parties who do so) tailored to your interests and/or location and to measure its effectiveness.
- Administer prize draws and competitions for our Business Purposes and/or with your Consent. We may use your information to administer prize draws and competitions when you elect to participate in competitions.
- Request Feedback for our Business Purposes and/or with your Consent. We may use your information to request feedback and to contact you about your use of our Sites.
- To protect our Sites for Business Purposes and/or for Legal Reasons. We may use your information as part of our efforts to keep our Sites safe and secure (for example, for fraud monitoring and prevention).
- To enforce our terms, conditions and policies for Business Purposes and/or for legal Reasons.
- To respond to legal requests and prevent harm for legal Reasons. If we receive a subpoena or other legal request, we may need to inspect the data we hold to determine how to respond.
- For other Business Purposes. We may use your information for other Business Purposes, such as data analysis, identifying usage trends, determining the effectiveness of our promotional campaigns and to evaluate and improve our Sites, products, services, marketing and your experience.

### **3. WILL YOUR INFORMATION BE SHARED WITH ANYONE?**

*In Short: We only share information with your consent, to comply with laws, to protect your rights, or to fulfill business obligations.*

We only share and disclose your information in the following situations:

- **Compliance with Laws.** We may disclose your information where we are legally required to do so in order to comply with applicable law, governmental requests, a judicial proceeding, court order, or legal process, such as in response to a court order or a subpoena (including in response to public authorities to meet national security or law enforcement requirements).
- **Vital Interests and legal Rights.** We may disclose your information where we believe it is necessary to investigate, prevent, or take action regarding potential violations of our policies, suspected fraud, situations involving potential threats to the safety of any person and illegal activities, or as evidence in litigation in which we are involved.
- **Vendors, Consultants and other Third-Party Service Providers.** We may share your data with third party vendors, service providers, contractors or agents who perform services for us or on our behalf and require access to such information to do that work. Examples include: payment processing, data analysis, email delivery, hosting services, customer service and marketing efforts. We may allow selected third parties to use tracking technology on the Sites, which will enable them to collect data about how you interact with the Sites over time. This information may be used to among other things, analyze and track data, determine the popularity of certain content and better understand online activity. Unless described in this Policy, we do not share, sell, rent or trade any of your information with third parties for their promotional purposes.
- **Business Transfers.** We may share or transfer your information in connection with, or during negotiations of, any merger, sale of company assets, financing, or acquisition of all or a portion of our business to another company.
- **Business Partners.** We may share your information with our Business Partners to offer you certain products, services or promotions.
- **With your Consent.** We may disclose your personal information for any other purpose with your consent.

#### **4. DO WE USE COOKIES AND OTHER TRACKING TECHNOLOGIES?**

*In Short: We may use cookies and other tracking technologies to collect and store your information.*

We may use cookies and similar tracking technologies (like web beacons and pixels) to access or store information. Specific information about how we use such technologies and how you can refuse certain cookies is set out in our Cookie Policy.

#### **5. DO WE USE GOOGLE MAPS?**

*In Short: Yes, we use Google maps for the purpose of providing better service.*

This website, mobile application, or Facebook application uses Google maps API's. You may find the Google Maps APIs Terms of Service here\*. To better understand Google's Privacy Policy, please refer to this link <https://policies.google.com/privacy?hl=en> . By using our maps API implementation, you agree to be bound by Google's Terms of Service.

#### **6. HOW LONG DO WE KEEP YOUR INFORMATION?**

*In Short: We keep your information for as long as necessary to fulfill the purposes outlined in this privacy policy unless otherwise required by law.*

We will only keep your personal information for as long as it is necessary for the purposes set out in this privacy policy, unless a longer retention period is required or permitted by

law (such as tax, accounting or other legal requirements). No purpose in this policy will require us keeping your personal information for longer than the period of time in which users have an account with us.

When we have, ongoing legitimate business need to process your personal information, we will either delete or anonymize it, or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

## **8. HOW DO WE KEEP YOUR INFORMATION SAFE?**

*In Short: We aim to protect your personal information through a system of organizational and technical security measures.*

We have implemented appropriate technical and organizational security measures designed to protect the security of any personal information we process. However, please also remember that we cannot guarantee that the internet itself is 100% secure. Although we will do our best to protect your personal information, transmission of personal information to and from our Sites is at your own risk. You should only access the services within a secure environment.

## **9. DO WE COLLECT INFORMATION FROM MINORS?**

*In Short: We do not knowingly collect data from or market to children under 18 years of age.* We do not knowingly solicit data from or market to children under 18 years of age. By using the sites, you represent that you are at least 18 or that you are the parent or guardian of such a minor and consent to such minor dependent's use of the Sites. If we learn that personal information from users less than 18 years of age has been collected, we will deactivate the account and take reasonable measures to promptly delete such data from our records. If you become aware of any data we have collected from children under age 18, please contact us at [info@mwananchicredit.com](mailto:info@mwananchicredit.com)

## **Account Information**

If you would at any time like to review or change the information in your account or terminate your account you can:

- Log into your account settings and update your user account.

Upon your request to terminate your account, we will deactivate or delete your account and information from our active databases. However, some information may be retained in our files to prevent fraud, troubleshoot problems, assist with any investigations, enforce our Terms of use and/or comply with legal requirements.

**Cookies and similar technologies:** Most Web browsers are set to accept cookies by default. If you prefer, you can usually choose to set your browser to remove cookies and to reject cookies. If you choose to remove cookies or reject cookies, this could affect certain features or services of our Sites.

**Opting out of email marketing:** You can unsubscribe from our marketing email list at any time by clicking on the unsubscribe link in the emails that we send or by contacting us using the details provided below. You will then be removed from the marketing email list – however, we will still need to send you service related emails that are necessary for the administration and use of your account, to otherwise opt out, you may:

- Access your account settings and update preferences.
- Note your preferences when you register an account with the site.

## **12. DO WE MAKE UPDATES TO THIS POLICY?**

*In Short: Yes, we will update this policy as necessary to stay compliant with relevant laws.*

We may update this privacy policy from time to time. The updated version will be indicated by an updated 'Revised' date and the updated version will be effective as soon as it is accessible. If we make material changes to this privacy policy, we may notify you either by prominently posting a notice of such changes or by directly sending you a notification. We encourage you to review this privacy policy frequently to be informed of how we are protecting your information.

## **13. HOW CAN YOU CONTACT US ABOUT THIS POLICY?**

If you have questions or comments about this policy, you may email us at [info@mwananchicredit.com](mailto:info@mwananchicredit.com) or by call us on:

Mwananchi Credit Limited.

HEAD OFFICE: Ecobank Towers, 10<sup>th</sup> Floor, Muindi Mbingu Street +254 795 600 600 / +254 709 147 000

PENSION BRANCH, Mezzanine 1, Loita Street

ECOBANK BRANCH: Ecobank Towers, 2<sup>nd</sup> Floor, Muindi Mbingu Street-

KITENGELA BRANCH: Capital Centre Building, 2<sup>nd</sup> Floor

ELDOROT BRANCH: Zion Mall, 2<sup>nd</sup> Floor, Uganda Road Opp Aga Khan Hospital