



FINSEIL LIMITED DATA PRIVACY POLICY

I. Introduction.

Finseil Limited respects your privacy and is committed to protecting your personal data. This Data privacy policy (“hereafter, “this policy”) will inform you as to how we obtain, store and or release your personal data whenever you visit any of our social media platforms. This policy will further inform you about your privacy rights and how the law protects you.

II. Purpose of this policy.

This policy aims to give you information on how we collect, process and preserve your personal data whenever you are in use of our Platforms, including any data you may provide through our Platforms when you sign up to our subscription services, apply for a loan or purchase of our services.

Our Platforms are not intended for children (i.e., persons under the age of eighteen (18) years) and we do not knowingly collect or process data relating to children save for where there is a guardian’s consent.

It is important that you read this policy together with any other policy we may provide on specific occasions when we are collecting or processing your personal data so that you are fully aware of how, why and where we shall be using your data. This policy supplements other notices and policies and is not intended to override them.

III. Contact details.

If you have any questions about this policy or our privacy practices, please contact our data protection officer using the contact details below.

(a) Email address: info@finseil.ltd

(b) Telephone number: +254709008100

IV. Changes to the privacy policy and your duty to inform us of changes.

We keep this policy under regular review. This version was last updated on the date appearing at the top of this policy. Historic versions can be obtained by contacting us.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.





V. Third-party links.

Our Platforms may include links to third-party websites, plug-ins, and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy policies. When you leave our Platforms, we encourage you to read the privacy policy of every website you visit.

VI. The data we collect about you.

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- A). **Technical Data** includes internet protocol (IP) address, your login 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 Platforms.
- B). **Profile Data** includes your username and password, purchases or service request made by you, your interests, preferences, feedback, and survey responses.
- C). **Personal information:** Contact information (e.g., email address, postal & physical address, Identification or Passport numbers, telephone), Social information (gender, age).
- D). **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We also collect, use, and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but may not be considered personal data in law as this data will not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific Platform feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this policy.

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested,





we may not be able to perform the contract we have or are trying to enter into with you. In this case, you will not be able to access services available through our Platforms.

VII. How is your personal data collected?

We use different methods to collect data from and about you including through:

A). **Direct interactions.** You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:

- request to use our services or seek to provide services on our Platforms;
- create an account or an account is created for you on our Platforms;
- subscribe to the content on our Platforms;
- request marketing notifications to be sent to you;
- enter a promotion or survey; or
- give us feedback or contact us.

B). **Automated technologies or interactions.** As you interact with our Platforms, we will automatically collect Technical Data about your equipment, browsing actions and patterns. 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.

C). **Third parties or publicly available sources.** We will receive personal data about you from various third parties and public sources as set out below.

- Technical Data from the analytics providers such as Google Analytics.
- Contact, Financial and Transaction Data from providers of technical, and payment services such as banks, mobile money providers, and payment and card service providers.
- Identity and Contact Data from publicly available sources and data aggregators.

VIII. Marketing.

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 how we decide which products, services and offers may be relevant for you (we call this marketing).





You will receive marketing communications from us if you have requested information from us or purchased services from us and you have not opted out of receiving that marketing notifications.

We will get your express opt-in consent before we share your personal data with any third party for marketing purposes.

You may opt out of receiving marketing communications at any time by following the opt-out links on any marketing message sent to you, by sending an email request to info@finseil.ltd, or by downloading and submitting a completed Consent Withdrawal Form available on our website.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a service purchase, service experience or other transactions.

IX. Cookies.

Our Platforms uses cookies to distinguish you from other users of our Platforms. This helps us to provide you with a good experience when you browse our Platforms and allows us to improve our Platforms.

A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer or device if you agree. Cookies contain information that is transferred to your computer or device's hard drive.

We use the following cookies:

- A). **Strictly necessary cookies.** These are cookies that are required for the operation of our Platforms. They include, for example, cookies that enable you to log into secure areas of our Platforms or make use of e-billing services.
- B). **Analytical or performance cookies.** These allow us to recognize and count the number of visitors and to see how visitors move around our Platforms when they are using it. This helps us to improve the way our Platforms work, for example, by ensuring that users are finding what they are looking for easily.
- C). **Functionality cookies.** These are used to recognize you when you return to our Platforms. This enables us to personalize our content for you, greet you by name and remember your preferences (for example, your choice of language or region).





D). **Targeting cookies.** These cookies record your visit to our Platforms, the pages you have visited and the links you have followed. We will use this information to make our Platforms and the advertising displayed on it more relevant to your interests.

Third parties may also use cookies, over which we have no control. These third parties may include, for example, advertising networks and providers of external services like web traffic analysis services. These third-party cookies are likely to be analytical cookies or performance cookies or targeting cookies. To deactivate the use of third-party advertising cookies, you may visit the consumer page to manage the use of these types of cookies.

You can block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our Platforms.

X. Change of purpose.

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you.

We may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

XI. Disclosures of your personal data.

We may share your personal data with selected third parties for the purposes set out in this policy, including but not limited to: law enforcement agencies, regulatory authorities, courts, fraud prevention and CRB agencies, debt collection entities, and other authorized service providers.

In addition, third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this policy.





We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

XII. International transfers.

By way of disclosure, many of our external third-party service providers (including hosting, and analytics service providers) are based outside Kenya so their processing of your personal data will involve a transfer of data outside Kenya.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of Kenya.

XIII. Data security.

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used, or accessed in an unauthorized way, altered, or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

XIV. Data retention.

Subject to applicable laws, we will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting, or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

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.





In some circumstances, we will anonymize 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.

XV. Your legal rights.

Under certain circumstances, you have rights under data protection laws in relation to your personal data:

- A). **Request access** to your personal data (data subject access request). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- B). **Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- C). **Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- D). **Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- E). **Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:
 - If you want us to establish the data's accuracy.
 - Where our use of the data is unlawful, but you do not want us to erase it.



- Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims.
- You have objected to our use of your data, but we need to verify whether we have overriding legitimate grounds to use it.

F). Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

G). Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please contact us.

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). We may however charge a reasonable fee if your request is clearly unfounded, repetitive, or causing us to incur attendant costs.

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.

We are committed to responding to all legitimate requests within the statutory timelines prescribed by the Kenya Data Protection Act, 2019 and its subsequent regulations. Specifically, we will strive to respond to:

- Access requests within seven (7) days;
- Rectification and erasure requests within fourteen (14) days;
- Restriction and objection requests within fourteen (14) days;
- Data portability requests within thirty (30) days;
- Consent withdrawal requests without undue delay.

Occasionally, it could take us longer if your request is particularly complex or you have made several requests, subject to the extensions permitted by law. In this case, we will notify you and keep you updated.

