



EQUITY GROUP HOLDINGS PLC

PRIVACY NOTICE

In this Privacy Notice:

Data Protection Legislation means (i) before 25 May 2018, the EU Data Protection Directive 95/46 and all national implementing laws (including the UK Data Protection Act 1998); (ii) on or after 25 May 2018, the EU General Data Protection Regulation 2016/679 ("**GDPR**"); and (iii) Data Protection Act No. 24 of 2019 of the laws of Kenya as modified and amended from time to time together with all other applicable and national implementing legislation relating to privacy or data protection; and where we use the terms "**personal data**", "**data subject**", "**controller**", "**processor**" and "**process**" (and its derivatives), such terms shall have the meanings given to them in the Data Protection Legislation.

INTRODUCTION

Equity Group Holdings Plc (**Equity Group**) and its subsidiaries are committed to keeping your personal data private. We shall process any personal data we collect from you in accordance with Data Protection Legislation and the provisions of this Privacy Notice. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

DATA CONTROLLER

For the purpose of the Data Protection Regulation Equity Group and its subsidiaries is the data controller of your information. This means that we are responsible for deciding how we hold and use your personal data. We are required under Data Protection Legislation to notify you of the information contained in this Privacy Notice.

COLLECTING INFORMATION FROM YOU

Equity Group and its Subsidiaries will collect and process your personal data you provide us through application forms, our website, face-to-face and electronic communication (including telephone conversations) in order to provide our services to you.

THE KIND OF INFORMATION WE HOLD ABOUT YOU

We may collect, store, and use the following categories of personal data about you:

- Personal contact details such as name, title, addresses, telephone numbers, and personal email addresses.

- Date of birth
- Gender
- Employment status and salary
- Marital status and dependants
- Financial information
- Pay records
- Location of employment or workplace
- Copies of driving licences or other IDs like passports
- Information we obtain from third parties, such as information that we obtain when verifying details supplied by you and information collected from publicly available sources such as Companies House. Such third parties may include fraud prevention agencies, banks, merchants and credit reference agencies.
- Other information about an individual that you or they disclose to us when communicating with us
- CCTV footage and other information obtained through electronic means
- Photographs
- IP addresses
- Cookies (please see our privacy policy)

In addition we may collect, store and use following information about you while you access your bank account with us through the imobile app or any electronic device:

- Bayuserid
- First name
- Middle name
- Last name
- MPIN - Storing in base64 encoded format.
- CIFNumber
- Password - Storing in base64 encoded format.
- WLDevice ID
- Device model
- Device OS version
- Device OS Type
- Last login success date
- First activated date
- Last reactivated date

How we use your information	Legal basis
<p>To provide and manage your account(s) and our relationship with you</p>	<ul style="list-style-type: none"> · Where necessary for the performance of our agreement or to take steps to enter into an agreement with you · Where the law requires this · Where it's in our legitimate interests to ensure that our customer accounts are well-managed, so that our customers are provided with a high standard of service, to protect our business interests and the interests of our customers
<p>To give you statements and other information about your account or our relationship</p>	<ul style="list-style-type: none"> · Where necessary for the performance of our agreement or to take steps to enter into an agreement with you · Where the law requires this
<p>To handle enquiries and complaints</p>	<ul style="list-style-type: none"> · Where necessary for the performance of our agreement or to take steps to enter into an agreement with you · Where the law requires this · Where it's in our legitimate interests to ensure that complaints are investigated, for example, so that our customers receive a high standard of service and so that we can prevent complaints from occurring in future · In the case of sensitive information, such as medical information, where you have agreed
<p>To provide our services to you</p>	<ul style="list-style-type: none"> · Where necessary for the performance of our agreement or to take steps to enter into an agreement with you · Where the law requires this
<p>For assessment, testing (including systems tests) and analysis (including credit and/ or behaviour scoring), statistical, market and product analysis and market research. [We may use this information to prepare statistical reports to be shared internally or with our group companies. We compile these reports from information about you and our other customers. The information in these reports is never personal and you will never be identifiable from them].</p>	<ul style="list-style-type: none"> · Where the law requires this · Where it's in our legitimate interests to develop, build, implement and run business models and systems which protect our business interests and provide our customers with a high standard of service
<p>To evaluate, develop and improve our services to you and other customers</p>	<ul style="list-style-type: none"> · Where it's in our legitimate interests continually to evaluate, develop or improve our products as well as the experiences of users of our sites, so

	that our customers are provided with a high standard of service
To protect our business interests and to develop our business strategies	<ul style="list-style-type: none"> · Where it's in our legitimate interests to protect our people, business and property and to develop our strategies · Where necessary for the performance of our agreement or to take steps to enter into an agreement with you · Where the law requires this · In the case of sensitive information, such as medical information, where you have agreed
<p>To contact you, by post, phone, text, email and other digital methods. This may be:</p> <ul style="list-style-type: none"> · to help you manage your accounts · to meet our regulatory obligations · to keep you informed about products and services you hold with us and to send you information about products or services (including those of other companies) which may be of interest to you. 	<ul style="list-style-type: none"> · Where the law requires this · Where we have agreed to contact you in our agreement · Where the law requires this · Where you agree · Where it's in our legitimate interests to share information with our customers about products / services that may be relevant and beneficial to them. Where we send you marketing messages, you can always tell us when you no longer wish to receive them. Please see more information in the Contact Us section
To collect any debts owing to us	<ul style="list-style-type: none"> · Where it's in our legitimate interests to collect any debts owing to us · In the case of sensitive information, such as medical information, where you have agreed
To meet our regulatory compliance and reporting obligations and to prevent, detect, investigate and prosecute fraud and alleged fraud, money laundering and other crimes. We may record your image on CCTV when you visit our premises.	<ul style="list-style-type: none"> · Where the law requires this · Where it's in our legitimate interests to prevent and investigate fraud, money laundering and other crimes · Where such processing is a contractual requirement of the services or financing you have requested
To assess any application you make, including carrying out fraud, money laundering, identity,	<ul style="list-style-type: none"> · Where you have made data public · Where such actions are in our legitimate interests, for the protection of our business interests

<p>sanctions screening and any other regulatory checks.</p>	<p>Where the law requires this In the case of sensitive information, such as medical information, where you have agreed</p>
<p>To monitor, record and analyse any communications between you and us, including phone calls</p>	<p>Where it's in our legitimate interests, to check your instructions to us, to prevent and detect fraud and other crime, to analyse, assess and improve our services to customers, and for training, for the enhancement of our customer service provision and protection of our business interests In the case of sensitive information, such as medical information, where you have agreed</p>
<p>To transfer your information to or share it with any third party to whom your account has been or may be transferred following a restructure, sale or acquisition of any group company</p>	<p>Where necessary for the performance of our agreement with you Where we have a legitimate interest in restructuring or selling part of our business</p>
<p>To share your information with UK or other relevant tax authorities, credit reference agencies, fraud prevention agencies, and UK and overseas regulators and authorities</p>	<p>Where the law requires this Where we have a legitimate interest in performing certain credit checks so that we can make responsible business decisions. As a responsible organisation, we need to ensure that we only provide certain products to companies and individuals where the products are appropriate, and that we continue to manage the services we provide, for example if we consider that you may have difficulties making a payment to us. Where we have a legitimate interest in assisting with the prevention and detection of fraud and other crime Where we have a legitimate interest in assisting UK and overseas regulators, who monitor banks to ensure that they comply the law and regulations More detail on our data sharing with these organisations is set out below</p>
<p>To share your information with our partners and service providers</p>	<p>Where necessary for the performance of our agreement</p>

	Where we have a legitimate interest in using third parties to provide some services for us or on our behalf
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Please note, however, that in certain circumstances it may be still lawful for us to continue processing this information even where consent has been withdrawn, if one of the other legal bases described below is applicable.

LAWFUL GROUNDS FOR USING YOUR INFORMATION

We are permitted to process your personal data in compliance with Data Protection Legislation by relying on one or more of the following lawful grounds:

- You have explicitly agreed to us processing such information for a specific reason.
- The processing is necessary to perform the agreement we have with you or to take steps to enter into an agreement with you.
- The processing is necessary for compliance with a legal obligation we have.
- The processing is necessary for the purposes of a legitimate interest pursued by us, which might be:
 - to provide services to you;
 - to ensure that our customer accounts are well-managed;
 - To prevent, detect, investigate and prosecute fraud and alleged fraud, money laundering and other crimes and to verify your identity in order to protect our business and to comply with laws that apply to us and/or where such processing is a contractual requirement of the services or financing you have requested;
 - to protect our business interests;
 - to ensure that complaints are investigated;
 - to evaluate, develop or improve our services; or
 - to keep our customers informed about relevant services, unless you have indicated at any time that you do not wish us to do so.

PURPOSES OF PROCESSING

Specifically, we and our other group companies may use your information for the following purposes and under the following legal bases:

AUTOMATED DECISION MAKING

If you apply to us for a product, your application may be processed by an automated decision-making process which may carry out credit and affordability assessment checks to determine whether your application will be accepted. Where these automated processes suggest that your application should be rejected, we will manually review your application before making a final decision. We may also use automated processes to decide credit limits.

We may also carry out automated anti-money laundering and sanctions checks. This means that we may automatically decide that you pose a fraud or money laundering risk if the processing reveals your behaviour to be consistent with that of known fraudsters or money launderers, is inconsistent with your previous submissions, or you appear to have deliberately hidden your true identity.

If we, or a fraud prevention agency, determine that you pose a fraud or money laundering risk: (i) we may refuse to provide the services you have requested, or we may stop providing existing services to you; and (ii) a record of any fraud or money laundering risk will be retained by the fraud prevention agencies, and may result in others refusing to provide services or employment to you.

If you have any questions about this, please contact us on the details set out below.

INFORMATION SHARING

We keep all your personal data confidential. However, in order to be able to service your needs to the best of our ability, we may share any information you provide to us with our group companies and their agents, counterparties and support service or data providers, wherever located. If you have provided information to other members of our group, those entities may also share that information with us. We will ensure that if we share such information with third parties, any such disclosure is at all times in compliance with Data Protection Legislation.

To help us provide services, your data will be processed internally and externally by other third parties. We use third parties for [administrative, servicing, monitoring and storage of your data]. We will outsource some services to third parties whom we consider capable of performing the required processing activities so that there is no reduction in the service standard provided to you by us.

The recipients or categories of recipients, of your information may be:

- Any revenue service or tax authority including to KRA, if obliged to do so under applicable regulations. For Common Reporting Standards and FATCA, we may also have to report your account(s) to the necessary tax authorities.
- UK and overseas regulators and authorities in connection with their duties (such as crime prevention).
- Anyone to whom we may transfer our rights and/or obligations;
- Any other person or organisation after a restructure, sale or acquisition, as long as that person uses your information for the same purposes as it was originally given to us or used by us (or both).
- Credit reference, identity and address verification organisations who may record and use your information and disclose it to other lenders, financial services organizations and insurers. Your information may be used by those third parties to make assessments in relation to your creditworthiness for debt tracing.
- Fraud prevention agencies and law enforcement agencies who will use it to prevent fraud and money-laundering and to verify your identity if false or inaccurate information

is provided by you and fraud is identified. We, fraud prevention agencies and law enforcement agencies may access and use your information for example, when:

- Checking details on applications for credit and credit related or other facilities;
- Managing credit and credit related accounts or facilities;
- Recovering debt;
- Checking details on proposals and claims for all types of insurance.

Fraud prevention agencies can hold your personal data for different periods of time. If they're concerned about a possible fraud or money laundering risk, your data can be held by them for up to six years.

DETAILS OF DATA TRANSFERS OUTSIDE THE EEA AND KENYA

Information about you in our possession may be transferred to other countries outside the European Economic Area and Kenya (particularly to our parent company in Kenya) for any of the purposes described in this Privacy Notice.

You and they understand and accept that these countries may have differing (and potentially less stringent) laws relating to the degree of confidentiality afforded to the information it holds and that such information can become subject to the laws and disclosure requirements of such countries, including disclosure to governmental bodies, regulatory agencies and private persons, as a result of applicable governmental or regulatory inquiry, court order or other similar process. In addition, a number of countries have agreements with other countries providing for exchange of information for law enforcement, tax and other purposes.

When we, or our permitted third parties, transfer information outside the European Economic Area and Kenya, we or they will impose contractual obligations on the recipients of that data to protect such information to the standard required in the European Economic Area and Kenya . We or they may require the recipient to subscribe to international frameworks intended to enable secure data sharing. In the case of transfers by us, we may also transfer your information where the transfer is to a country deemed to provide adequate protection of your information by the European Commission or Data Commissioner or you have consented to the transfer.

If we transfer your information outside the European Economic Area and Kenya in other circumstances (for example because we have to provide such information by law), we will use best endeavours to put in place appropriate safeguards to ensure that your information remains adequately protected.

RETENTION AND DISPOSAL OF DATA AND OUTPUT

We will only keep the information we collect about you on our systems or with third parties for as long as required for the purposes set out above or as required to comply with any

legal obligations to which we are subject. This will involve us regularly reviewing our files to check that information is accurate and up-to-date and still required.

We will normally destroy or erase data after statutory timelines lapse. However, we may retain your information, or information relating to your account after you cease to be a customer for longer than this, provided it is necessary for a legal, regulatory, fraud prevention or other legitimate business purpose.

STORAGE OF YOUR PERSONAL DATA AND DATA SECURITY

All information you provide to us is stored in our secure servers. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our website, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised 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 basis. 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 data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

Please read the section on our website relating to online security which can be accessed here visiting <http://EquityGroup.africa/privacy>.

OUR COMMUNICATION WITH YOU

We may communicate with you via electronic mail (e-mail). We will never ask you for your password or account number.

When you contact us through any of our communication channels including visiting a local branch or calling the telephone banking service, we will verify your identity by asking you a number of questions based on information known to us about you and the transactions on your account. We may record your calls for training, quality and security purposes.

MARKETING INFORMATION

We and other members of our group may use your information from time to time to inform you by letter, telephone, text (or similar) messages, email or other electronic means, about similar services which may be of interest to you or them.

You, your may, at any time, request that we cease or do not send such information by one, some or all channels, by contacting us using the contact details set out below.

RIGHTS OVER YOUR PERSONAL DATA

Under certain circumstances, by law you have the right to:

- Be informed about the processing of your personal data (i.e. for what purposes, what types, to what recipients it is disclosed, storage periods, any third party sources from which it was obtained, confirmation of whether we undertake automated decision-making, including profiling, and the logic, significance and envisaged consequences).
- Object to your personal data being processed for a particular purpose or to request that we stop using your information.
- Request not to be subject to a decision based on automated processing and to have safeguards put in place if you are being profiled based on your personal data.
- Ask us to transfer a copy of your personal data to you or to another service provider or third party where technically feasible and otherwise required by applicable regulations.
- Withdraw, at any time, any consent that you have previously given to us for our use of your personal data.
- Ask us to stop or start sending you marketing messages at any time.
- Request access to your personal data (commonly known as a "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.
- Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected. 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 working relationship with us.
- Request the erasure of your personal data. This enables you to ask us to delete or remove personal data where you think that we do not have the right to process it.

Any request for access to or a copy of your personal data must be in writing and we will endeavour to respond within a reasonable period and in any event within one month in compliance with Data Protection Legislation. We will provide this information free of charge unless the request is manifestly unfounded or excessive. We will comply with our legal obligations as regards any individual's rights as a data subject.

If you would like to contact us in relation to any of the rights set out above please contact us using the following contact details. To protect your privacy and security, we may take reasonable steps to verify your identity before providing you with the details.

You have the right to lodge a complaint with Equity Group.

If you are outside the Kenya region;

If you have questions about our Privacy Policy, please [contact us](#) on support@EquityGroup.africa or write us here:

Equity Group Holdings Plc

9th Floor, Equity Centre

Hospital Road, Upper Hill

Nairobi, Kenya

P.O. Box 75104-00200

RIGHT TO COMPLAIN TO THE DC

You can contact the DC if you have any concerns about how the Equity Group and its Subsidiaries has handled your personal data and you also have the right to make a complaint at any time to the Data Commissioner (DC), the Kenya supervisory authority for data protection issues. You can find out more information about your rights as a data subjects, their regulatory powers and actions they can take on their website.

THIS PRIVACY NOTICE

The content or services mentioned on our website may be changed in future and consequently this Privacy Notice may also change. Any changes we may make to this Privacy Notice in the future will be posted on this page and where appropriate, notified to you by email. We recommend that you re-visit this page regularly and inform us if you do not agree to any term mentioned here.

CONSENT

I/ We the undersigned confirm I/ we have read and understood the terms of the this Privacy Policy and hereby give express, unequivocal, free, specific and informed authority to Equity Group Holdings Plc and its Subsidiaries to use and process My/ Our data pursuant to the terms of the privacy policy hereinabove written.

Insert name & Signature
