

## **PRIVACY POLICY FOR ZENKA FINANCE LIMITED WEBSITE**

### **(“Policy”)**

1. This privacy policy sets out how Zenka Finance Limited (“Zenka”) uses and protects any information that you provide to Zenka. We use your personal data to provide our services, improve the quality of services and products offered, send notifications, offers and promotional materials, protect our rights and interests as well as the rights and interests of third parties, and comply with generally applicable laws.
2. Zenka is devoted to ensuring that your privacy is protected. Should we ask you to provide certain information by which you can be identified when accessing your account information, you can be assured that such information will only be used in accordance with this privacy statement.
3. Zenka has a firm policy of protecting the confidentiality and security of information that we collect from our customers. We do not share your non-public personal information with unaffiliated third parties.
4. The information will be only shared with your consent except for the specific purposes below, in accordance with all applicable laws. Please read this Policy carefully. It gives you important information about how we handle your personal information.
5. Zenka reserves the right to change this Policy at any time.

#### **I. USE OF INFORMATION**

1. If you choose to give us feedback on the website via the application form or if you request additional information from Zenka, you will be asked for your name and address and will have the option of providing other information, such as your profession, the information collected will be used consistency with this Policy.
2. The information collected will be used to improve our services, can be used by advising you about our products, services and other opportunities, maintaining your account with us.

#### **II. INFORMATION WE COLLECT AND STORE**

1. We collect your personal data when you provide them to us directly, use our products, services or website, use cookies or similar technology, and when we receive personal data from third parties.
2. Please be informed that we use a tool that allows us to make automatic decisions. Making decisions in an exclusively automated way is the ability to make decisions using technological tools without human involvement. We use the above technology to reduce the risk of making a mistake, lowering the risk of non-payment of a loan, and most importantly, it allows a credit decision to be made in a shorter period of time.
3. We would like to kindly inform you that we collect your data on few ways:
  - a. Automatically when you visit our website. Please take into account that these kind of data are mostly collected by cookie files and tracking of navigation signals;
  - b. Your personal data can be provided through third party for example via credit bureau and from our business partners;
  - c. We can obtain your data directly from you, a specially for these that you left on our application from, on our website, via social medias, during phone calls, presented on

the e-mails, posts, chats or any other services or tools through which you contacts with us.

4. Please, be informed that we collect all information that you provide to us regardless of the form provided. Firstly we would like to inform you that your data are collected when:
  - a. you use or register on our website, when you fill out all application forms or submit applications for our products or services offered on our website, when you contact with our employees or which are provided in any other way provided to us;
  - b. you report a problem or communicate with us about our products or services;
  - c. you participate in discussion groups, you use social media as facebook, Instagram,
  - d. you participate in our promotions actions, contests or surveys, or any other activities provided through our websites or our social media profiles.
  - e. you communicate with us using the above-mentioned methods with any other reason then mentioned above.
5. Taking into account point 4 we may collect the following data concerning you: name, surname, national ID number and any other data included on national ID, home address, employer name and address, remuneration, position, registration or correspondence address, e-mail address, mobile number, date of birth, sex, marital status, employment status, work phone number, monthly income and expenses, bank account number, transactions on bank accounts, description, voice recording (incoming and outgoing calls), your photo, signature and any other information you would provide to us.
6. Please be also informed that we can record our telephone conversations for training purposes, in connection with processing complaints, for evidentiary purposes, and to verify customer service transactions.
7. Additionally please we would like to inform you that we are collection your personal data automatically when you visit our website. Below we present data that are collected in this way:
  - a. all the activities performed on our website, in particular, the number of visits, including the full URL address with the date and time of the visits, all the movements on the website like clicking, mouse cursor movement, information concerning the products, services, files that you have browsed including graphics and HTML websites, ways to leave our website;
  - b. also we collect information concerning the technical details of the device through which you have opened our website, we are also collecting data of the kind of the devices that you use to connect with our website, data from internet service providers, IP address;
  - c. we collect data about web browsers that you use on your devices, as well as settings, data about the operating system used, font coding;
  - d. additionally, we collect information about the time zone in which you are staying and the location;
  - e. text messages, call history, number of photos in the photo catalog.

### **III. CONTROLLER AND DISCLOSURE**

1. Zenka Finance Limited with its registered seat in Kampala, Uganda, Mirembe Business Centre, Plot 46, Lugogo Bypass Road, having the register number 80020001385298 is the part of Zenka Group which is capital group. We respect your privacy and ensure protection of your personal data and the processing of your personal data in accordance with the law.

2. We can transfer your personal data to other companies which are part of the Zenka's capital group for internal administrative purposes.
3. Please be informed that we can provide your information to selected third parties in connection with the fulfillment of our contractual obligations to you and for other purposes described in this Policy. Below you will find the list of services providers to which we may entrust your personal data. The services provider may provide the following services:
  - a. supporting our daily business activities, regarding this field for instance we can use services consisting in hosting and website development, risk assessment and fraud detection, debt recovery and customer service, counteracting money laundering and terrorist financing, providing analytical tools for use in our services, support marketing activities;
  - b. supporting to develop existing products and services or which can help to create new products or new services.
4. We can transfer your personal data:
  - a. at any time when we are legally obliged to do; in particular we may disclose information about using our services and your visit to our websites in order to ensure compliance with the law, when we can have reasonable suspicion that these disclosure is necessary to protect our rights, protect your safety or the safety of others, prevent and detecting fraud or responding to requests from state institutions;
  - b. when it is in connection with the personal identification, detection and prevention of fraud and protection against fraud and to reduce credit risk and prevention of money laundering activities and the financing of terrorist activities;
  - c. for credit bureaus and credit intermediaries, competent national authorities and non-governmental organizations, as well as other third parties to provide a full assessment of your creditworthiness;
  - d. when executing a direct debit or other payment due under the loan agreement you have entered into with you; then we may share your personal data with external suppliers providing payment processing services;
  - e. in the event of non-performance or improper performance of your obligations arising from concluded loan agreement, we may transfer data regarding your overdue liabilities to debt collection companies, credit information bureaus and companies providing legal services.
  - f. we may submit your personal data to the analysts and service providers who provides web browsers services, who help us improve and optimize our application and/or website.
  - g. during sells all or part of our business, or transferring our receivables to a third party.
5. Your personal data will be processed, stored and transferred to third parties by the channels indicated in this Policy and in the amounts referred to in this Policy, in the agreements between you and us, and in the consents granted by you.

#### **IV. SECURITY**

1. We are committed to ensuring that your information is secure. In order to prevent unauthorized access or disclosure we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the information we collect.
2. In order to protect this information Pocco Finance have employs software programs to monitor network traffic to identify unauthorized attempts to upload or change information, or otherwise cause damage to the information provided by customers.

## **V. THIRD PARTY**

1. We kindly inform you that we can send the requests to the external entities to provide to us information regarding your data. In particular, we can use suppliers operating in the area of technical services, payment services, suppliers of specialized analytical tools, and also providers of information search services while providing us with the service, in addition, they may be made shared or disclosed if you agreed to disclose your data.
2. finally we can also obtain your data from the banks or financial institutions, payment institutions concerning your payments in favor of Zenka.
3. Be also informed that we will search your data, information about you, your creditworthiness, your financial situation including your incomes and your debts, information about your employment, in credit bureaus, publicly available sources, other suppliers providing such information.

## **VI. HOW TO CONTACT US ABOUT THE WEBSITE**

If you have a question about the way your information is used in connection with this website or about Pocco Finance privacy policy and information practices, you may send complaints through the following address: Zenka Finance Limited Kampala, Uganda, Mirembe Business Centre, Plot 46, Lugogo Bypass Road.