

## PRIVACY POLICY OF ZENKA

### (" POLICY")

#### 1. How Zenka Works

- 1.1. Zenka Finance Limited with its registered seat in Nairobi, Kenya ("Zenka") is specialized in consumer lending. Our company provides you with a mobile application called "Zenka app" for which you can apply for a loan.
- 1.2. Zenka app greatly simplifies the process of obtaining a loan by allowing you to borrow amount according with internal credit policy that you qualify for, within the allowed limits, from anywhere and wherever you may be. Zenka app does this by using your data as contained in your device and Zenka's app algorithms to identify you, verify your identity, assess your creditworthiness, credit risk, create a credit score for you and to comply with applicable laws, regulations, and rules, such as those relating to KYC (know-your-customer) and anti-money laundering requirements, also to analyze your behavior and to detect and prevent fraud and other illegal uses of our services.
- 1.3. The more you use Zenka app to apply for loans and pay on time, the higher your loan limit goes.

#### 2. Your Privacy

- 2.1. Your privacy and personal information is of utmost concern to us. We consider your privacy to be very important and would never share your personal information without your explicit consent and in any unlawful manner.
- 2.2. 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.
- 2.3. When you download Zenka app, we shall ask for your permission (consent) to view your SMS, Mpesa, Airtel Money and T-Kash SMS in particular and other pertinent information in order to verify your identity, your creditworthiness and to enable us to generate a credit score for you so as to provide you with personalized loans, to detect and prevent fraud and other illegal uses of our services, to analyze your behaviors, to perform activities relating to KYC (know-your-customer) and anti-money laundering requirements.
- 2.4. We collect your personal data when you download Zenka app and you grant us the relevant consents, you provide it to us directly, use our products, services or website, use cookies or similar technology, and when we receive personal data from third parties.
- 2.5. 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.
- 2.6. Please be informed that you have right to:
  - 2.6.1.request to correct your data or limit the processing of your personal data and,
  - 2.6.2.request access to your personal data.
- 2.7. Please be informed that we process your personal data in order to assess credit risk and assess your creditworthiness, to detect and prevent fraud and other illegal uses of our services, to

analyze your behaviors, to perform activities relating to KYC (know-your-customer) and anti-money laundering requirements, which allows us to decide whether to grant you a loan and in what amount can be granted.

- 2.8. We would like to kindly inform you that we collect your data on few ways:
  - 2.8.1. Automatically when you visit our website or Zenka App. Please take into account that these kind of data are mostly collected by cookie files and tracking of navigation signals. Decisions that are not fully automatic are those that may include the actions of our employees. For instance, before we grant you a loan, we will investigate your creditworthiness and in some cases we may perform additional phone verification, which takes place before making a credit decision.
  - 2.8.2. Your personal data can be provided through third party for example via credit bureau and from our business partners;
  - 2.8.3. We can obtain your data directly from you, a specially for these that you left on our application form, on your personal profile created on our Zenka App, 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.
- 2.9. You agree to inform us promptly, and in any event, within 30 days, via e-mail or by calling to our customer care Infoline if there are any changes to your data supplied to us from time to time, and to respond promptly to any request from us.
- 2.10. Where we have given you or where you have chosen a password or PIN that enables you to access certain parts of our Zenka app, you are responsible for keeping this password confidential. You are requested to not share a password or login with anyone.

### **3. Controller of the data**

- 3.1. Zenka Finance Limited with its registered seat in Nairobi, Kenya, having the register number PVT-EYU82X2 is the part of Zenka Group capital group is controller of your data. We respect your privacy and ensure protection of your personal data and the processing of your personal data in accordance with the law.
- 3.2. The data that we collect from you may be transferred to, and stored at, a destination outside Kenya. Thus, by submitting your personal data, you agree to this transfer, storing or processing of data.
- 3.3. We can transfer your personal data to other companies which are part of the Zenka's capital group for internal administrative purposes or for services necessary to make a credit decision.
- 3.4. 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:
  - 3.4.1. identification of your identity;
  - 3.4.2. 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;

- 3.4.3. supporting to develop existing products and services or which can help to create new products or new services;
- 3.5. We can transfer your personal data:
  - 3.5.1. 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 and using Zenka app 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;
  - 3.5.2. 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;
  - 3.5.3. for credit reference 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;
  - 3.5.4. 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;
  - 3.5.5. 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 reference bureaus and companies providing legal services.
  - 3.5.6. 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.
  - 3.5.7. during sells all or part of our business, or transferring our receivables to a third party.
- 3.6. Your personal data will be processed, stored and transferred to third parties by the channels indicated in this Policy, in the agreements between you and Zenka, and in the consents granted by you.
- 3.7. We may associate any category of information with any other category of information and will treat the combined information as personal data in accordance with this Policy for as long as it is combined.

#### **4. The scope of data**

- 4.1. 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:
  - 4.1.1. you register on our website, use it or you use our Zenka app, when you fill out all application forms or submit applications for our products or services offered on our website or Zenka app, when you contact with our employees or which are provided in any other way;
  - 4.1.2. you report a problem or communicate with us about our products or services;
  - 4.1.3. you participate in discussion groups, you use social media as facebook, Instagram,
  - 4.1.4. you participate in our promotions actions, contests or surveys, or any other activities provided through our websites or our social media profiles.
  - 4.1.5. you communicate with us using the above-mentioned methods with any other reason then mentioned above.

- 4.2. Taking into account point 4.1. 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, registration or correspondence address, e-mail address, mobile number, date of birth, sex, marital status, employment status, work phone number, monthly income and expenses, content of your sms saved on your mobile, financial information and information about your credit card, bank account number, transactions on bank accounts, description, signature, and any other information you would provide to us.
- 4.3. 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.
- 4.4. Additionally please we would like to inform you that we are collection your personal data automatically when you visit our website or use our Zenka app. below we present data that is collected in this way:
  - 4.4.1.all the activities performed on our website or Zenka app, 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 or Zenka app 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 or Zenka app.
  - 4.4.2.Also we collect information concerning the technical details of the device through which you have opened our website or for which our Zenka app has been downloaded, we are also collecting data of the kind of the devices that you use to connect with our website or Zenka app, data from internet service providers, IP address and also we have data about your login to your personal profile created in Zenka;
  - 4.4.3.we collect data about web browsers that you use on your devices, as well as settings, data about the operating system used, font coding,
  - 4.4.4.additionally, we collect information about the time zone in which you are staying and the location,
  - 4.4.5.text messages.

## **5. Third party**

- 5.1. 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 In particular, 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,
- 5.2. In addition, they may be made shared or disclosed if you agreed to disclose your data.
- 5.3. Finally we can also obtain your data from the banks or financial institutions, payment institutions concerning your payments in favor of Zenka.
- 5.4. 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 references bureaus, publicly available sources, other suppliers providing such information.
- 5.5. You agree that Zenka shall not be liable for any loss or damage arising from or incidental to our use, collection, processing and sharing of information relating to you, and any action we have taken in relation to this section.

## **6. Final provisions**

- 6.1. We may update our Policy from time to time. Whenever we make a change, we will post the updated Policy at our website or Zenka app when you next start the App. We encourage you to check our Policy periodically. The new terms may be displayed on-screen and you may be required to read and accept them to continue your use of the App or the services.
- 6.2. This Privacy policy was last updated on **30th August 2019**.

## **7. Loans' Rates and Fees**

- 7.1. Zenka issues loans that range between KES 500 to KES 30000 for terms that range between 1 day to 61 days. Interest vary from 12% to 29% of the loan principal. Late payment of loans attracts late payment interest is 1% daily of the loan principal. Zenka terms and conditions apply.
- 7.2. Effective APR: varies between 146% and 352.8%.
- 7.3. Important: All interests and fees that may be charged by Zenka are not compounded nor accrue from day to day. Borrowers only pay back the loan principal and the fixed loan interest if the loan is paid on or before the due date; and if the loan is paid after the due date, loan principal, the fixed loan interest and the late payment interest, only. There are no hidden fees or interest or charges.