

Data Policy Statement

1. INTRODUCTION

Your privacy is very important to us. This privacy statement describes how Aglowis Capital Limited (hereafter referred to as “the Company”, “us”, “we”, “our”, “ours”) protects the personal data it processes, why and how we collect and use your personal data and how you can exercise your rights in relation to the processing of your personal data.

- I. This statement should be read together with our Terms and Conditions for products and services.
- II. Personal data is information relating to our customer or potential customers (hereafter referred to as “you” or “your”)
- III. The data controller of your personal data is Aglowis Capital Limited that you have or may have a relationship with.
- IV. This statement applies to all customers, potential customers, suppliers or service providers, third party visitors, agents with whom we have an agreement, valuers and auctioneers with whom we have an agreement and all clients who have any business dealings with the company.

2. STATEMENT OF DETAILS

2.1 *Collection of Information*

We collect your personal information with your knowledge and consent when you do any of the following (These examples are non-exhaustive, which is reflective of the varied nature of the personal data we may collect.):

- i. Apply for a specific product or service.
- ii. Ask Aglowis Capital Limited for more information about a product or service or contact us with a query or complaint.
- iii. Respond to or participate in a survey, marketing promotion, prize competition or special offer.
- iv. Subscribe to any of our online services, Short Message Service (SMS), email or social media platforms.
- v. We may also collect your information from other organizations including credit-reference bureaus, fraud prevention agencies and business directories.
- vi. When we require personal data from you to fulfil a statutory or contractual requirement.
- vii. We may also collect information when you visit us.
- viii. Where you’ve been identified as a next of kin by our customer or employee.
- ix. When you interact with our sales team, they may collect personal information.
- x. When you have applied for employment at the Company.
- xi. Attend an event sponsored by ACL.
- xii. Make an application to the Company or interact with us as supplier, agent, or dealer.
- xiii. When you make an application or engage with the Company as a beneficiary in any of our programs.

2.2 *What Information is Collected*

The information we collect and store about you includes but is not limited to the following:

- i. Your identity including your name, passport photo, address, location, phone number, identity document type and number, date of birth, email address, age, and gender.

- ii. Your account information, information about your bank account numbers and SWIFT codes or other banking information.
- iii. Your transaction information from MPESA statements and bank statements.
- iv. Details on your earnings as per your pay slip.
- v. Your signature specimen.
- vi. Your employer and employment details.
- vii. Your contact with us, such as when you: call us or interact with us through social media (we may record your conversations, social media, or other interactions with us).

2.3 Use of Information

We may use and analyse your information for the following purposes:

- i. Processing applications for products and services, effecting payments, transactions and completing instructions or requests.
- ii. Responding to any of your queries or concerns.
- iii. Verifying your identity information through publicly available and/or restricted government databases in order to comply with applicable regulatory requirements.
- iv. Assessing suitability for products and services.
- v. Carrying out credit checks and credit scoring.
- vi. Keeping you informed generally about new products and services and contacting you with any new product unless you opt out of receiving such marketing messages (you may contact the Company at any time to opt out of receiving marketing messages or by sending stop to the number provided in the SMS);
- vii. To comply with any legal, governmental, or regulatory requirement or for use by our lawyers in connection with any legal proceedings.
- viii. To understand how you use our products and services for purposes of developing or improving products and services.
- ix. Preventing and detecting fraud or other crimes and for debt recovery.
- x. For research, statistical, survey and other scientific or business purposes.
- xi. Provide aggregated data (which do not contain any information which may identify you as an individual) to third parties for research and scientific purpose.
- xii. Administer any of our online platforms/websites.

2.4 Legal Basis for Processing of Personal Data.

We will process your personal data based on the applicable Data Protection Laws as amended from time to time:

- i. Performance of a Product/Service agreement with you.
- ii. The company's legitimate business interests.
- iii. Compliance with a mandatory legal obligation.
- iv. Consent you provide.
- v. Public interest.
- vi. Compliance with a mandatory legal obligation to which it is subject to.
- vii. To protect your vital interest or the vital interests of any person.

2.5 Retention of Information

We retain your personal data in line with our legal and regulatory obligations and for business and operational purposes. In most cases this will be for seven years from the end of your relationship with us.

Anonymized information that can no longer be associated with you may be held indefinitely.

3. DISCLOSURE OF INFORMATION

3.1 *We may disclose your information to:*

- I. Law-enforcement agencies, regulatory authorities, courts, or other statutory authorities in response to a demand issued with the appropriate lawful mandate and where the form and scope of the demand is compliant with the Company.
- II. Our associates, partners, software developers or agents who are involved in delivering the company's products and services you order or use.
- III. Fraud prevention and Anti money laundering agencies, credit- reference agencies.
- IV. Publicly available and/or restricted government databases to verify your identity information to comply with regulatory requirements.
- V. Debt-collection agencies or other debt-recovery organizations.
- VI. Any other person that we deem legitimately necessary to share the data with.

3.2 *We shall not release any information to any individual or entity that is acting beyond its legal mandate.*

3.3 *Marketing*

From time to time, we may also use your personal data to contact you for market research or to provide you with information about other services we think would be of interest to you. You may be required to opt-in or give any other form of explicit consent before receiving marketing messages from us. We respect your right to control your personal data depending on which of our products you use. Therefore, at a minimum, we will always give you the opportunity to opt-out of receiving such direct marketing or market research communications. You may exercise this right to opt-out at any time.

4. ACCESS TO AND UPDATING YOUR INFORMATION

If you believe that our records contain inaccurate or incomplete information about you, please visit any of our branch outlets to make the necessary amendments. Some changes will only be made once the necessary supporting documentation has been obtained. We will take reasonable steps to investigate your concerns and correct inaccurate information in a timely manner.

5. SAFEGUARDING AND PROTECTION OF INFORMATION

The company has put in place technical and operational measures to ensure integrity and confidentiality of your data via controls around: access control, physical and environmental security and monitoring as well as compliance.

6. YOUR RIGHTS

Subject to legal and contractual exceptions, you have rights under data protection laws in relation to your personal data. These are listed below: -

- I. Right to be informed that we are collecting personal data about you.
- II. Right to access personal data that we hold about you and request for information about how we process it.
- III. Right to request that we correct your personal data where it is inaccurate or incomplete.
- IV. Right to request that we erase your personal data noting that we may continue to retain your information if obligated by the law or entitled to do so.
- V. Right to object and withdraw your consent to processing of your personal we may continue to process if we have a legitimate or legal reason to do so.
- VI. Right to request restricted processing of your personal data noting that we may be entitled or legally obligated to continue processing your data and decline your request.
- VII. If you wish to exercise any of the rights set out above, please contact us on dataprivacy@aglowiscapital.com

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.

7. YOUR RIGHTS

If you would like to contact us on any topics in this privacy policy, you can email us on dataprivacy@aglowiscapital.com or submit a request via our digital platforms.

Our contact details as a Data Controller are as follows:

Data Protection Officer Aglowis Capital Ltd

Ngong Road Professional Centre, 3rd floor, Nairobi.

P.O Box 48412-00100 Nairobi, Kenya

Tel: +254(0) 721 865770/ +254(0) 733 283749

<https://www.aglowiscapital.com>

8. RIGHT TO LODGE COMPLAINT

Please let us know if you are unhappy with how we have used your personal data. You can contact us using our contact channels above. You also have the right to lodge a complaint with the relevant supervisory authority that is tasked with personal data protection within the republic of Kenya.

9. AMENDMENTS TO THIS STATEMENT

The company reserves the right to amend or modify this statement at any time and you are advised to visit this site regularly to check for any amendments.