



USHURU SACCO SOCIETY LIMITED PRIVACY NOTICE

1. INTRODUCTION

Ushuru Sacco Society Limited is a deposit taking Sacco registered in Kenya and 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 practices regarding your personal data and how we will treat it.

2. COLLECTING INFORMATION FROM YOU

We may collect and process your personal data through information that you provide us such as when you fill out application forms, through our website, face-to-face and electronic communication (including telephone conversations) in order to provide our services to you.

3. 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.
- Personal information such as passport photos, Date of birth, Gender, Marital status, employment status, and Next of Kin
- Financial information
- Copies of your identity documents such as IDs or 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 Registry. Such third parties may include fraud prevention agencies, banks 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 in our premises
- IP addresses

In addition we may collect, store and use information about you while you access our services through online means, such as the browser or device you use to access our sites and platforms, how you use the sites, traffic and location data.

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certain circumstances it may be still lawful for us to continue processing this information even where consent has been withdrawn, if one of the other legal bases described below is applicable.

4. HOW WE USE YOUR INFORMATION

We'll only use your information where we have your consent or where we have another lawful reason including:

- to carry out our obligations from any contracts entered into between you and us or to take steps to enter into an agreement with you.
- to meet our regulatory compliance and reporting obligations
- to provide our services to you, manage your accounts and our relationship with you
- to respond to your queries and complaints to us and any other requests that you may have made to us

- 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 unless you have indicated at any time that you do not wish us to do so.
- to prevent, detect, and investigate fraud and alleged fraud practices and other crimes
- to verify your identity in order to protect you and your assets
- 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]
- to evaluate, develop and improve our services to you and other customers
- to protect our business interests and to develop our business strategies
- to contact you, by post, phone, text, email and other digital methods. This may be for reasons such as to collect any debts owing to us

5. AUTOMATED DECISION MAKING

If you apply to us for a product, your application may be processed by an automated decision-making process such as:

- Credit and affordability assessment checks to determine whether your application will be accepted as well as decide credit limits.
- Anti-money laundering and sanctions checks

6. INFORMATION SHARING

We keep all your personal data confidential. However, in order to service your needs and provide you with the best products and services, we may share any information you provide to us with 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 the law.

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 also include:

- Regulatory authorities in connection with their duties such as Sacco regulatory authority and Investigative agencies;
- Anyone to whom we may transfer our rights and/or obligations;
- Any other person or organization 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 Bureau, identity and address verification organizations.

7. DETAILS OF DATA TRANSFERS OUTSIDE KENYA

Information about you in our possession may be transferred or stored in other countries outside Kenya for any of the purposes described in this Privacy Notice including countries that may have differing (and potentially less stringent) laws relating to the degree of protection of personal information. It holds that such information can become subject to the laws and disclosure requirements of such countries for any lawful purposes.

When we, or our permitted third parties, transfer information outside Kenya, we or they will ensure that it is lawful and that it has an appropriate level of protection.

We may also transfer your information where you have consented to the transfer.

If we transfer your information outside 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.

8. 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.

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.

9. 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.

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 data privacy policy <http://ushurusacco.com/privacy-policy>.

10. OUR COMMUNICATION WITH YOU

We may communicate with you via electronic mail (e-mail), post, phone, text, and other digital methods. We will never ask you for your password or account number.

When you contact us through any of our communication channels including visiting regional offices 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.

11. MARKETING INFORMATION

We 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 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.

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.

12. YOUR RIGHTS

You have several rights in relation to the information that we hold about you, including:

- the right to access your personal data in our custody;
- to object or restrict to the processing of all or part of your personal data. We may however continue to process where we have a legitimate reason to do so, or required by law;
- to correction of false or misleading data;
- the right to request that we delete false or misleading data about you.

You have the right to lodge a complaint with Ushuru Sacco Society Limited or raise a question about this Privacy Policy, Please contact us on info@ushurusacco.com or write us here:

Ushuru Sacco Society Limited
Ushuru Sacco Centre
Kilimani, Wood Avenue, Ngong Road
P.O. Box 52072-00200
Nairobi, Kenya

13. 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 through our various channels.