

Musoni Privacy Notice

This Privacy Notice explains how we use and hold the personal data we collect from you when you join or use our products or services.

Personal data we hold and use

The types of information we collect and use or hold about you for our financial products and services include:

- a. Personal and contact details, your name, ID No., date of birth, gender and/or age;
- b. Records of your contact with us and your payment details;
- c. Physical address details for your home / business.
- d. Vehicle information, including make, model, age, usage, breakdowns, repairs, and faults;
- e. Information which we obtain from Credit Reference Agencies, IPRS, NTSA
- f. Criminal records information, including alleged offences if this necessary for your employment with us;
- g. Your marital status, family, next of kin;
- h. Information from third parties, including vehicle details, details of outstanding finance, fraud prevention databases, property, geographic and demographic details, marketing data, and information to help improve the relevance of our products and services or to help us manage our products and services, pricing or risk;
- i. Third party transactions, such as your bank statements and M-Pesa statements
- j. Video / photographic information about you.

Sources of your personal data

The types of information we hold comes from different sources. These are:

- i. You directly, and any information from family members, guarantors or next of kin.
- ii. Business partners (e.g. garage agents, financial services institutions, insurers, MNOs) or others needed to provide our services to you;
- iii. Anyone who operates any of your accounts, products or services on your behalf (e.g. via a Power of Attorney, solicitors, intermediaries, etc);
- iv. From sources such as Fraud Prevention Agencies, Credit Reference Agencies, publicly available directories and information (e.g. telephone directory, social media, internet, news articles), debt recovery and/or tracing agents, other organizations to assist in prevention and detection of crime, police and law enforcement agencies; and
- v. Information we source about you or customers generally from commercial third parties, including demographic information, vehicle details, fraud information, marketing data, property and other information to help improve our products and services or our business.

Reasons for holding and using your personal data

The information we collect is used by us and our authorized business partners / third parties for the following reasons:

- a. To provide you with our products or services or decide whether to do so;
- b. Assessing an application for a loan product, including considering whether or not to offer you the product, the price, the risk of doing so, availability of payment methods and the terms;
- c. Providing you with your letter of offer in the event you qualify for a loan product;
- d. Communicating with you and holding records about our dealings and interactions with you;
- e. Making decisions about you or your loan application, including your continued suitability for it, the risk of providing you with the loan, and assessing compliance with the product terms;
- f. To manage the operation of our business and those of our in-house or third party partners;
- g. To carry out checks at IPRS, Credit Reference and Fraud Prevention Agencies at client onboarding, hiring, loan pre-application, application, and periodically after that;
- h. Updating your records, tracing your whereabouts, and recovering debt;
- i. To share information as needed with business partners (CRBs, AGF where applicable) as required for managing your loans or assessing application account beneficiaries, service providers or as part of providing, administering, or developing our products and services or our business; and
- j. To make automated decisions, including profiling, on whether to offer you a product or service, or the price, payment method, risk or terms of it.

For our legitimate interests or those of others:

- i. To develop our loan products or services using the information we hold;
- ii. To continually develop, improve and manage our risk assessment and pricing models;
- iii. To test and improve the performance of our products, services, processes and systems;
- iv. To improve the operation of our business - and that of our business partners – for example, by improving customer service and operational performance and efficiency;
- v. To develop new products and services, and to review and improve current products and services;
- vi. For management and auditing of our business operations - including accounting;
- vii. To monitor and to keep records of our communications with you and our staff;
- viii. To send marketing by SMS, email, phone, post, social media and digital channels (e.g. using Facebook)
- ix. To provide insight and analysis of our customers both for ourselves and business partners based on your products, your use of it;
- x. To facilitate the sale of one or more parts of our business;
- xi. To share information with business partners as necessary for the purposes listed in this notice; and
- xii. To comply with our legal obligations such as our financial services or regulatory obligations

Sharing and disclosures of your personal data

The categories of third parties we use are listed below. We will use these third parties for all the reasons we have described in this notice, and they may process the types of personal information we also hold or use.

- 1) With any parties involved in a recovery process if they need to receive information to allow us to handle any of your loan product that goes into default.
- 2) With service providers who are a part of providing products and services to you or help us to operate our business.
- 3) Police and law enforcement agencies if we are required, or to support a criminal investigation.
- 4) Governmental and regulatory bodies such as NTSA, and the Data Commissioner's Office.
- 5) Organizations and businesses who provide services to us under our authority such as service providers, debt recovery agencies, IT companies, and suppliers of business support services.
- 6) Credit Reference and Fraud Prevention Agencies.
- 7) Market research organizations who help us to develop and improve our products and services.
- 8) With next of kin / guarantors.

Withdrawing your consent

Where we rely on your consent, you can withdraw it at any time by using the contact details in the Contact Us section below.

Transfers outside of Kenya

Your personal information may be transferred outside Kenya, for example to our ICT service providers. If we do so, we'll make sure that suitable safeguards are in place where required, for example by using approved contractual agreements or other legal arrangements unless certain exceptions apply.

Sharing with credit reference and fraud prevention agencies

If you apply for credit or take a product on the basis of us offering credit, to process your application we will perform credit, risk and identity checks on you with one or more Credit Reference Agencies (CRAs). To do this, we supply your personal information to CRAs and they will give us information about you. This will include information about your financial situation and financial history. CRAs will supply to us both public and shared credit, financial situation, insurance and financial history information and fraud prevention information.

If you have credit, we may continue to exchange information about you with CRAs while you have a relationship with us, and if necessary afterwards. We will also notify the CRAs about your settled accounts.

Changes to your data

You should tell us if the personal information you have provided to us changes so that we can update our records. The contact details for this purpose are in your policy documents. We'll then update your records if we can.

Retention of your personal data

Unless we explain otherwise to you, we'll hold your personal information based on the following criteria:

- a) For as long as we provide products or services to you.
- b) To comply with legal and regulatory requirements or guidance; or
- c) For as long as we have reasonable business needs.

Your data protection rights

Here is a list of the rights that all individuals have under Kenya data protection laws. They don't apply in all circumstances so your request may not always be granted. If you wish to use any of them, we will explain when we respond to you if they apply or not, or if we will comply or not with your request, including the reasons why.

- a) The right to be informed about the processing of your personal information;
- b) The right to have your personal information corrected if it is inaccurate and to have incomplete personal information completed;
- c) The right to object to processing of your personal information;
- d) The right to restrict processing of your personal information;
- e) The right to have your personal information erased;
- f) The right to request access to your personal information and how we process it;
- g) The right to move, copy or transfer your personal information; and
- h) Rights in relation to automated decision making which has a legal effect or otherwise significantly affects you.
- i) You have the right to complain to the Data Commissioner's Office which enforces data protection laws. You can contact our Data Protection Officer (DPO) for more details on all the above.

Changes to this privacy notice

We may change this privacy notice from time to time to reflect changes in the law and/or our privacy practices. We encourage you to check this privacy notice for changes periodically –

<https://musoni.co.ke/privacy-policy>.



Contact Us or our DPO

You can use the contact details in your Letter of Offer or you can go to the Contact Us section of our website. Alternatively, you can write to Musoni Microfinance Ltd, Cape Office Park along, Ring Road Kilimani, Opp Yaya Centre, P.O. Box 25351 – 00100, Nairobi, Kenya. Tel: 0709 761101, marking it for the attention of the DPO or email info@musoni.co.ke.