

# **EASYGARI GROUP LTD:**

## **DATA PROTECTION POLICY**

## **The Data Protection Policy**

### **1. Definitions**

**“EasyGari”** or **“the Company”** means EasyGari Group Ltd, a company registered in Kenya under number PVT-V7UYG6QR address P.O Box 48129 – 00100, Nairobi, Kenya.

**“data”** means information which:

- a) is processed by means of equipment operating automatically in response to instructions given for that purpose;
- b) is recorded with the intention that it should be processed by means of such equipment;
- c) is recorded as part of a relevant filing system;
- d) where it does not fall under the paragraphs above, forms part of an accessible record; or
- e) is recorded information which is held by a public or private entity and does not fall within any of the paragraphs above.

**“data controller”** means a natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purpose and means of processing of personal data;

**“Data Protection Act”** or the **“DPA”** means the Data Protection Act No. 24 of 2019 and all subsequent regulations, under the Laws of Kenya as amended from time to time;

**“GDPR”** means the General Data Protection Regulation (EU) 2016/679;

**“personal data”** means any information relating to an identified or identifiable natural person;

**“processor”** means a natural or legal person, authority, organization or other agency that processes personal data on behalf of the controller.

### **2. Who we are**

EasyGari is a financial services company that offers a comprehensive suite of asset finance products for individuals, Small and Medium Enterprises (SMEs) and Corporates across Kenya. The Company’s mission is to help entrepreneurs to grow their businesses by availing fast and affordable credit. EasyGari leverages physical assets owned by entrepreneurs or their businesses, chiefly motor vehicles, to provide their credit products.

### **3. Personal data and other information collected**

This Data Protection Policy helps explain the thinking behind the information (including correspondence) and practices, with regard to the information we process to support the provision of the services offered through our product suite. A good illustration is the information we collect for business purposes and how this affects you as our client. The Data Protection Policy explains the steps we take as a Company to protect your privacy and comply with the GDPR, the DPA and any other applicable data protection legislation.

The Company must receive and collect some information in order to operate, provide, improve, understand, customize, support, and market our product suite and services. This also includes any

personal data that you install, access, or use from our product suite. The type of information we receive and collect depends on how you use our product suite and services.

In certain circumstances it may be lawful for the Company to continue processing information even where consent has been withdrawn, in the event, that a legal basis is applicable.

This Data Protection Policy applies to all EasyGari's services and products unless specified otherwise. All Terms and Conditions ("Ts and Cs"), which describe the terms under which you access and use our product suite and services apply to this Data Protection Policy.

#### **4. Information provided by our clients and third-party information**

This Data Protection Policy also applies to any information you provide the Company including but not limited to your basic information, customer data, profile name and picture, personal contact details including e-mail addresses and telephone numbers, biometric data, financial information and all information obtained from third parties, including those from publicly available sites.

#### **5. Automatically collected information**

This Data Protection Policy also applies to all usage and log information, device, connection and location information and cookies as specified below.

##### **Cookies**

The Company uses cookies to operate and provide our services, including to provide services that are web-based, improve your experiences, understand how our services and product suite are being used and to customize our product suite.

As an example, if you leave a comment on our site you may opt-in to saving your name, e-mail address and website in cookies. These are for your convenience so that you do not have to fill in your details again when you leave another comment. These cookies will last for a specified amount of time that will be communicated to you, once on our site.

Other examples include using your account to log in to our site or product suite, setting a temporary cookie that is determined by your browser accepting the cookie. This temporary cookie contains no personal data and is discarded when you close your browser.

#### **6. How we use your data**

The Company uses the data provided, with your consent, to operate, provide, improve, understand, customize, support, and market our product suite and services.

#### **7. Analytics**

The Company may use a number of analytical tools and products to collect visitor's data. We will provide a link to the Data Privacy Policy of any analytical products utilized, in the event you would like to opt out or install any add-ons onto your browser.

## 8. Information sharing

All personal data is kept confidential. In certain instances, in order to enable the service of your needs and meet legal obligations, we may share any information you provide to us within our group of companies and their agents, counterparties, support service or data providers, and government authorities or agents (when legally required), wherever located.

In the event, you have provided information to other members of our group of companies, 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 GDPR, the DPA, as well as any other relevant data protection legislation.

To assist with the provision of our services through our product suite, 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. This Data Protection Policy will also apply to any information shared with third parties.

## 9. Data Retention

The Company 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 the Company is subject to.

This will involve the Company regularly reviewing our files to check that information is accurate and is still required. We will destroy or delete 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.

## 10. Rights over your data

If you have an account on our site or product suite, you can request to receive an exported file of the personal data we hold about you, including any data you have provided to us, by emailing [info@easygari.co.ke](mailto:info@easygari.co.ke). You can also request that we delete any personal data we hold about you by submitting a filled **Data Consent Withdrawal Form** included as **Appendix 1** of this policy and submitting the same to [info@easygari.co.ke](mailto:info@easygari.co.ke). For the avoidance of doubt, the Company will not delete any data we are obliged to keep for administrative, legal, or security purposes.

## 11. Updates to our Data Protection Policy

The Company will notify any data subjects when any changes to this Data Protection Policy are made and give you the opportunity to request a deletion of your data if you are dissatisfied with the proposed changes to the policy.

**APPENDIX 1: Data Consent Withdrawal Form**

This form shall be filled out by anyone wishing to request deletion of their personal data, subject to retentions allowed in the Company's Data Protection Policy. The completed form should be sent to [info@easygari.co.ke](mailto:info@easygari.co.ke).

<b>Person Name:</b>	
<b>Email Address:</b>	
<b>Phone Number:</b>	
<b>Account Number:</b>	

<b>Data to be deleted (tick one):</b>	<input type="checkbox"/>	<input type="checkbox"/>	All	<input type="checkbox"/>	Subset of data
	If subset of data, please list the data to be deleted below:				
<b>Reason for deletion of data:</b>					

I confirm that the personal details provided above are true and correct and wish to have the specified data deleted by the Company.

Yours Sincerely,

Signature:

Name:

Date: