

# PRIVACY POLICY

## AT PATA MKOPO WE TAKE YOUR PRIVACY AND YOUR TRUST IN US VERY SERIOUSLY.

### 1. BASIS AND SCOPE OF OUR PRIVACY POLICY

- 1.1 The brand names "Zenka", "Zenka Finance" as well as their accompanying logo wherein used here, are owned by and are the intellectual property of Pata Mkopo Company Limited (a company incorporated under the laws of the Republic of Kenya with a company registration number PVT-LRUEVBV). All rights thereto are reserved.
- 1.2 Pata Mkopo is committed to protecting and respecting your privacy. We only use your personal information and data in accordance with our Privacy Policy. All of your information will be collected, handled, processed and stored in the most ethical manner and in accordance with the law.
- 1.3 This is important because: (a) upon downloading the App and clicking the "Accept" option with respect to these terms and conditions, you will be deemed to have accepted Pata Mkopo's Privacy Policy, a copy of which is available on the App; and (b) by visiting [www.zenka.ke](http://www.zenka.ke) and accepting our cookies, you will be deemed to have accepted and consented to the practices described in this policy.
- 1.4 This policy (together with our [Terms and conditions](#) and [Terms of use](#) and any other documents referred to on it) sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us.

### 2. INFORMATION WE MAY COLLECT FROM YOU

We may collect and process the following data about you:

- 2.1 Information you give us.
  - (a) You may give us information about you by filling in forms on our App or site [www.zenka.ke](http://www.zenka.ke) or by corresponding with us by phone, e-mail or otherwise. This includes information you provide when you register to use our App or USSD service, subscribe to our services and products, search for a service or product, place an request on our App, USSD service or site, participate in discussion boards or other social media functions on our site or social media platforms, enter a competition, promotion or survey organised by us, and when you report a problem with our App, USSD service or site or service or product.
  - (b) The information you give us may include your name, address, e-mail address and phone number, financial and credit information, personal description and photograph.
- 2.2 Information we collect about you.

With regard to each of requests made through the App, your visits to our site or engagement with us through our site, customer care centre or our social media accounts, we may automatically collect the following information:

- (a) technical information, including the type of mobile device you use, unique device identifiers such as internet protocol (IP) address of your computer or smart phone, or your device's IMEI or serial number or SIM card number of your non-smart phone or feature phone, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform, information about the SIM card used by your device, mobile network information;
- (b) content information, including information stored on your device, including contact lists, call logs, SMS logs, social media friends, followers and contacts, contact lists from other social media accounts, photos, videos or other digital content;
- (c) data from your use of any other third-party application on your device or the service sites;
- (d) log information including, details of your use of any of our Apps or USSD service or site or your visits to any of sites; including, but not limited to, traffic data, location data, weblogs and other communication data;
- (e) your name, address, e-mail address and phone number, the mobile device's phone number, SIM card details, age, username, password and other registration information, financial and credit information (including your mobile money account details, bank account details, and bank verification number, where applicable), personal description and photograph;
- (f) information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our App, site, system and network (including date and time); services or products you viewed or searched for or requested; page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page and any phone number used to request a service or call our customer service number;
- (g) location information using GPS technology or other location finding services to determine your current location. You can withdraw your consent to our collection, processing or use of this information at any time by logging out and uninstalling the App from your Device; and
- (h) using unique application numbers when you install or uninstall a service containing a unique application number or when such a service searches for automatic updates, that number and information about your installation, for example, the type of operating system, may be sent to us.

### 2.3 Information we receive from other sources.

- (a) We may receive information about you if you use any of the other apps or websites we operate or the other services or products we provide.

- (b) We are also working closely with third parties (including, for example, business partners, agents, consultants, service providers, mobile network operators, sub-contractors in technical, payment and delivery services, advertising networks, analytics providers, search information providers, credit reference bureaus) and may receive information about you from them.

### **3. COOKIES**

- 3.1 Our App and website use cookies to distinguish you from other users of our App and website. This helps us to provide you with a great experience when you browse our App and website and also allows us to improve our App and site.
- 3.2 For detailed information on the cookies we use and the purposes for which we use them see our [Cookie policy](#).

### **4. USES MADE OF THE INFORMATION**

We use information held about you in the following ways:

#### **4.1 Information you give to us.**

We will use this information:

- (a) to carry out our obligations arising from any contracts entered into between you and us and to provide you with the information, products and services that you request from us;
- (b) to provide you with information about other goods and services we offer that are similar to those that you have already purchased or enquired about;
- (c) to provide you, or permit selected third parties to provide you, with information about goods or services we feel may interest you. If you are an existing customer, we will only contact you by electronic means (e-mail or SMS) with information about goods and services similar to those which were the subject of a previous transaction or discussions with you. If you are a new customer, and where we permit selected third parties to use your data, we (or they) will contact you by electronic means only if you have consented to this. If you do not want us to use your data in this way, or to pass your details on to third parties for marketing purposes: (i) please tick the relevant box situated on the App before commencing the installation process; or (ii) do not request for our services and products via our USSD service;
- (d) to notify you about changes to our services and products; and
- (e) to ensure that content from our App and site is presented in the most effective manner for you and for your computer or your mobile phone.

#### **4.2 Information we collect about you**

We will use this information:

- (a) to administer our App and site, and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;

- (b) to improve our App and site to ensure that content is presented in the most effective manner for you and for your computer and mobile phone;
- (c) to allow you to participate in interactive features of our services and products, when you choose to do so;
- (d) as part of our efforts to keep our App and site, safe and secure;
- (e) to measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you; and
- (f) to make suggestions and recommendations to you and other users of our App and site about goods or services that may interest you or them.

4.3 Information we receive from other sources

- (a) We may combine this information with information you give to us and information we collect about you.
- (b) We may use this information and the combined information for the purposes set out above (depending on the types of information we receive).

**5. DISCLOSURE OF YOUR INFORMATION**

5.1 We may share your personal information with any member of our Group, which means our subsidiaries, our ultimate holding company and its subsidiaries.

5.2 We may share your information with selected third parties including:

- (a) business partners, agents, consultants, suppliers and sub-contractors for the performance of any contract we enter into with them or you;
- (b) advertisers, and advertising and marketing networks that require the data to select and serve relevant adverts to you and others. We may also use such aggregate information to help advertisers reach the kind of audience they want to target. We may make use of the personal data we have collected from you to enable us to comply with our advertisers' wishes by displaying their advertisement to that target audience;
- (c) analytics and search engine providers that assist us in the improvement and optimisation of our App and site; and
- (d) credit reference agencies for the purpose of assessing your credit score where this is a condition of us entering into a contract with you.

5.3 We may disclose your personal information to third parties:

- (a) in the event that we sell or buy our business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets.

- (b) if Pata Mkopo or substantially all of its assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets; and
- (c) if we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms of use or terms and conditions and other agreements; or to protect the rights, property, or safety of Pata Mkopo, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

## **6. WHERE WE STORE YOUR PERSONAL DATA**

- 6.1 The data that we collect from you may be transferred to, and stored at, a destination outside Kenya. It may also be processed by staff operating outside Kenya who work for us or for one of our suppliers. Such staff maybe engaged in, among other things, the fulfilment of your request, the processing of your loan borrowing or payment details and the provision of support services.
- 6.2 By submitting your personal data, you agree to this transfer, storing or processing. Pata Mkopo will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy.
- 6.3 All information you provide to us is stored on our secure servers. Any payment transactions will be encrypted using SSL technology or other more effective technology (if any). Where we have given you (or where you have chosen) a PIN or a password which enables you to access certain parts of our App, USSD service or site, you are responsible for keeping this PIN or password secret and confidential. We ask you NOT to share your PIN or password with anyone.
- 6.4 Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our App, USSD service or site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

## **7. YOUR RIGHTS**

- 7.1 You have the right to ask us not to process your personal data for marketing purposes.
- 7.2 We will usually inform you (before collecting your data) if we intend to use your data for such purposes or if we intend to disclose your information to any third party for such purposes. You can exercise your right to prevent such processing: (i) by ticking the relevant box situated on the App before commencing the installation process; or (ii) not requesting for our services and products via our USSD service. You can also exercise the right at any time by contacting us at [support@zenkafinance.com](mailto:support@zenkafinance.com).
- 7.3 Our site may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any

responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

**8. ACCESS TO INFORMATION**

8.1 The law gives you the right to access information held about you. Your right of access can be exercised in accordance with the law.

8.2 Any access request may be subject to our then prevailing charges as changed from time to time to meet our costs in providing you with details of the information we hold about you.

**9. CHANGES TO OUR PRIVACY POLICY**

Any changes we may make to our Privacy Policy in the future will be posted on our website and, where appropriate, notified to you by e-mail or SMS.

**10. CONTACT**

Questions, comments and requests regarding this Privacy Policy are welcomed and should be addressed to [support@zenkafinance.com](mailto:support@zenkafinance.com).