

PRIVACY POLICY

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1. Who are we

We are Cashlet app ('we', 'our', 'us') and we operate under the name Cashlet.

Cashlet is committed to maintaining the confidentiality, integrity, and security of any personal information about our users. This Privacy Policy explains how and why we use your personal information, which is provided on our Web site located at www.cashlet.co.ke (the "Site") and our mobile application (collectively, "Cashlet").

Cashlet stresses its privacy and security standards to guard against identity theft and provide security for your personal information. We regularly re-evaluate our privacy and security policies and adapt them as necessary to deal with new challenges. Got a question about something in this notice

- Chat with us through the app or send us an email at support@cashlet.co.ke

- Write to us at Cashlet, Saachi Plaza, Argwings Kodhek, Nairobi, Kenya

2. Highlights of this policy

We process data collected from you, and third parties, to make Cashlet work for you and comply with regulatory obligations.

Once we have received your information, we use strict procedures and security features to prevent unauthorized access. Information we deem sensitive is stored using state-of-the-art symmetric encryption (AES). We are bound and empowered by the Kenya Data Protection Bill to keep your information safe and we do this with pride.

In short, we use:

- Your details (names, address, date of birth, email, phone number, identify documents), to comply with our obligations to know our customer
- Data about your use of Cashlet to help us make Cashlet better

We share your data with trusted service providers and government entities to fulfill our contract with you, or comply with regulations:

- Payment service provider (M-Pesa) — who enable money transfers to allow you to deposit and withdraw
- Regulated Investment Providers (ICEA Lion Asset Management, Sanlam Investments East Africa, and Genghis Capital) — who make your savings and investing possible
- KYC Providers (Smile Identity and Appruve) — who help us check the identity information you give us
- Our regulator (the Capital Markets Authority of Kenya) — as part of their monitoring activities and to get approvals to offer our services to you
- Law enforcement and other government entities — where we are required to do so to comply with our regulatory and legal obligations.

You have the right to see, erase, or challenge the data we hold about you (among other rights). Our support team can help with this. Read the full privacy policy for further details on how we use your information.

3. The information we hold about you

Information you give us on sign up

This is information necessary to provide the basic Cashlet app Service (to fulfill the contract between us) and to comply with regulatory obligations to basic 'Know Your Customer' (KYC):

- First and last name
- Phone number
- Email

Information you give us after sign up to verify your identity

This is the information we require to secure your account, ensure that you are whom you say you are, unlock additional features, and to perform our regulatory obligations:

- Date of birth
- Address
- Identity documents and proof of nationality – for example, a picture of your national ID or passport, your KRA Pin, and a selfie of yourself

Information we automatically collect from your use of Cashlet

When you use Cashlet, or visit our website, we automatically collect information, including personal information, about the parts of the Cashlet Service you use, and how you use them. We collect this information to give you services safely and lawfully, and to keep improving them:

- details about payments to and from your Cashlet account, and your savings activity
- details about how you use our app
- Information you give us through Cashlet chat
- The mobile network and operating system you use, so we can analyze how our app works and fix any issues.
- Your IP address and device ID for security reasons (we'll link your mobile phone number with your device).

- Information about your device — your visits to and use of the site or the Service
- Information about your use of the Site — length of visit, page views, website navigation and search terms that you use, referral source/exit pages

Information we get from external sources

We receive the following personal information about you from our third-party service providers who assist us in providing some or all of the Service

- Our KYC (Know your customer) providers — to perform identity verification and money-laundering checks
- Public and Commercial Sources — to perform our KYC obligations, we might collect information from public sources such as sanctions lists or credit reference agencies:

4. How we use the information we collect from you

To provide and improve the Cashlet product — we process the information we collect given our legitimate interest in improving the Cashlet Service, and to fulfill the contract we have with you:

- Provide you with access to Cashlet, and enable your interaction with Cashlet
- Provide customer service
- Send you support messages, updates, security alerts, and account notifications
- To administer our site and the Service and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes

To prevent fraud, and ensure compliance with regulatory obligations — we process the information we collect given our legitimate interest to protect us from fraud and to comply with our regulatory obligations:

- Detect fraud
- To verify your identity, and check it against sanction lists

- To keep our platform secure

5. Who we share your data with

Service providers – To fulfill the contract we have with you, we use certain trusted service providers. Here we mean companies that help us provide services you use, and need to process details about you for this reason. We share as little information as we can and encrypt and/or make it impossible for you to be identified by the recipient where possible (for instance by using a User ID rather than your name). Our service providers are highlighted below:

- **Payment Service Provider (M-Pesa):** M-Pesa provides you with the mobile money transfer service which is necessary to be able to deposit into or withdraw from your Cashlet account. Whenever you initiate a transfer, we share your mobile number with them to enable this to happen.
- **KYC Providers (Smile Identity and Appruve):** Cashlet will share your personal information (names, national ID number, or passport number) with Smile Identity to verify your identity, and conduct fraud checks, to comply with our regulatory obligations.
- **Regulated Investment providers:** We partner with fund managers to provide you with money market funds that earn you market-leading interest on your savings. These fund managers are all regulated by the Capital Markets Authority (CMA) in Kenya. When you make a deposit or withdrawal, Cashlet will share your personal information, with these fund managers to fulfill our contract with you, and for the partner fund managers to provide their services to you and comply with their regulatory obligations.

Law enforcement and other government entities - To comply with our regulatory and legal obligations, we might share your information with government entities responsible for this.

- our industry regulator – the Capital Markets Authority (CMA) of Kenya
- authorities that spot and stop financial crime, money laundering, terrorism, and tax evasion if the law says we have to, or if it's necessary for other reasons
- the police, courts or dispute resolution bodies if we have to.

6. How long we keep your information

We keep most of your data as long as you're using Cashlet. If you no longer want us to use your information you can send a request to team@cashlet.co.ke. Please note that if you request the erasure of your data, we will keep relevant personal information for at least 6 years to comply with the law.

7. Your rights

You have a right to:

- access the personal data we hold about you or get a copy of it.
- ask for a copy of your data in a portable (machine-readable) format or make us send it to someone else.
- make us correct inaccurate data.
- ask us to delete, 'block' or suppress your data, though for legal reasons we might not always be able to do it.
- say no to us using your data for direct marketing and in certain other 'legitimate interest' circumstances.
- withdraw any consent you've given us.

To do any of these things, please contact us through the Cashlet app or by emailing team@cashlet.co.ke.

8. Where we store your data

All information you provide to us is stored on our secure servers. Any transmission of information to our partners (including information to facilitate payments) is encrypted using TLS technology, the current standard in secure communications over the Internet.

Once we have received your information, we will use strict procedures and security features to try to prevent unauthorized access. Information we deem sensitive is stored using state-of-the-art symmetric encryption (AES).

9. How to make a complaint

If you have a complaint about how we use your personal information, please contact us through the app or send an email to team@cashlet.co.ke and we'll do our best to fix the problem.

10. Changes to this policy

We'll post any changes we make to our privacy notice on this page and if they're significant changes we'll let you know by email.