

## **PESA PRINT/ NOTI – PRIVACY STATEMENT**

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### **1. Overview**

We are committed to safeguarding the privacy of our customers and users (you/your). This privacy policy (the Privacy Policy) sets how we, may collect, retain, process, share and transfer your Personal Data when you visit our Sites or use our Services. This Privacy Statement applies to your Personal Data when you visit Sites or use our Services, and does not apply to online websites or services that we do not own or control, including websites or services of other NoTi Users.

This Privacy Statement is designed to help you obtain information about our privacy practices and to help you understand your privacy choices when you use our Sites and Services. Please note that our Service offerings may vary by region. This Privacy Statement may be supplemented with additional notices depending on the Sites and Services concerned.

We have defined some terms that we use throughout the Privacy Statement. You can find the meaning of a term in title case in the Definitions section.

Please contact us if you have questions about our privacy practices that are not addressed in this Privacy Statement.

## 2. What Personal Data Do We Collect?

We collect Personal Data about you when you visit our Sites or use our Services, including the following:

- i. **Registration and use information** – When you register to use our Services by establishing an Account, we will collect Personal Data as necessary to offer and fulfil the Services you request. Depending on the Services you choose, we may require you to provide us with your name, postal address, telephone number, email address and identification information to establish an Account. We may require you to provide us with additional Personal Data as you use our Services.
- ii. **Transaction and experience information** – When you use our Services or access our Sites, for example, to make purchases from merchants, to receive money, to process payments, or to send money to friends and family, we collect information about the transaction, as well as other information associated with the transaction such as amount sent or requested, amount paid for products or services, merchant information, including information about any funding instruments used to complete the transaction, Device Information, Technical Usage Data, and Geolocation Information.
- iii. **Participant Personal Data** – When you use our Services or access our Sites, we collect Personal Data you provide us about the other participants associated with the transaction.
- iv. **Send or request money** - When you send or request money through the Services, we collect Personal Data such as name, postal address, telephone number, and financial account information about the participant who is receiving money from you or sending money to you. The extent of Personal Data required about a participant may vary depending on the Services you are using to send or request money.
- v. **Purchase and delivery of products and services.** We use your personal information to take and handle orders, deliver products and services, process payments, and communicate with you about orders, products and services, and promotional offers.
- vi. **Provide, troubleshoot, and improve NoTi Services.** We use your personal information to provide functionality, analyze performance, fix errors, and improve the usability and effectiveness of the NoTi Services.
- vii. **Recommendations and personalization.** We use your personal information to recommend features, products, and services that might be of interest to you, identify your preferences, and personalize your experience with NoTi Services.

- viii. **Provide voice, image and camera services.** When you use our voice, image and camera services, we use your voice input, images, videos, and other personal information to respond to your requests, provide the requested service to you, and improve our services.
- ix. **Comply with legal obligations.** In certain cases, we collect and use your personal information to comply with laws. For instance, we collect from sellers' information regarding place of establishment and bank account information for identity verification and other purposes.
- x. **Communicate with you.** We use your personal information to communicate with you in relation to NoTi Services via different channels (e.g., by phone, e-mail, chat).
- xi. **Advertising.** We use your personal information to display interest-based ads for features, products, and services that might be of interest to you. We do not use information that personally identifies you to display interest-based ads.
- xii. **Fraud Prevention and Credit Risks.** We use personal information to prevent and detect fraud and abuse in order to protect the security of our customers and others. We may also use scoring methods to assess and manage credit risks.
- xiii. **Pay or request someone else to pay a bill:** If you use our Services to pay a bill for the benefit of someone else, or if you request a User to pay a bill for you, we collect Personal Data from you about the account holder such as name, postal address, telephone number, email address, and account number of the bill that you intend to pay or request to be paid.
- xiv. **Add value to your accounts:** If you use our Services to add value to your Account or any other account you may have, or if you ask a User to add value to any of these accounts, we may collect Personal Data from you about the other party, or from the other party about you to facilitate the request. For example, if you use our Services to reload a mobile phone, or to request value to be added to your mobile account, we may collect Personal Data and other information including mobile account number from the other participant.
- xv. **Information about your profile and your friends and contacts** – It may be easier for us to help you transact with your friends and contacts if you choose to connect your contact list information with your Account. If you establish an account connection between your device or a social media platform and your Account, we will use your contact list information (such as name, address, email address) to improve your experience when you use the Services.
- xvi. **Personal data that you choose to provide us to obtain additional Services or specific online Services** – If you request or participate in an optional Site feature, or request enhanced Services or other elective functionality, we may collect additional information from you. We will provide you with a separate Notice at the time of collection, if the use of that Personal Data differs from the uses disclosed in this Privacy Statement.

- xvii. **Personal Data about you if you use unbranded Services** – certain Services are available without being required to log in to or establish an Account. We will collect Personal Data when you are interacting with and making payments to merchants using our payment services that do not carry the NoTi brand and when you checkout with NoTi without logging into an account. For our unbranded payment services, your interaction is with the merchant, on their platform. If you are an Account holder, or create an Account at a later date, we may collect information about unbranded transactions and associate them with your Account to improve your customer experience as an Account holder and for compliance and analytics purposes. If you are not an Account holder, we will collect and store all information you provide and use such information in accordance with this Privacy Statement.
- xviii. **Personal Data about you from third-party sources** – We obtain information from third-party sources such as merchants, data providers, and credit bureaus, where permitted by law.
- xix. **Other information we collect related to your use of our Sites or Services** – We may collect additional information from or about you when you communicate with us, contact our customer support teams or respond to a survey.

### **3. Why Do We Retain Personal Data?**

We retain Personal Data in an identifiable format for the least amount of time necessary to fulfill our legal or regulatory obligations and for our business purposes. We may retain Personal Data for longer periods than required by law if it is in our legitimate business interests and not prohibited by law. If your Account is closed, we may take steps to mask Personal Data and other information, but we reserve our ability to retain and access the data for so long as required to comply with applicable laws. We will continue to use and disclose such Personal data in accordance with this Privacy Statement.

The cookies we use have defined expiration times; unless you visit our Sites or use our Services within that time, the cookies are automatically disabled and retained data is deleted. Please consult our Statement on Cookies and Tracking Technologies for more information.

### **4. How Do We Process Personal Data?**

We may Process your Personal Data for a variety of reasons that are justified under data protection laws in Kenya to operate the Sites and provide the Services, including to:

- i. Initiate a payment;
- ii. Send or request money;
- iii. Add value to an account, or pay a bill;
- iv. Authenticate your access to an account;

- v. Communicate with you about your account, the Sites, the Services, or NoTi;
- vi. Create an account connection between your account and a third-party account or platform;
- vii. Perform creditworthiness and other financial standing checks, evaluate applications, and compare information for accuracy and verification purposes;
- viii. Keep your account and financial information up to date;
- ix. To manage our business needs, such as monitoring, analyzing, and improving the services and the sites' performance and functionality. For example, we analyze user behavior and perform research about the way you use our services;
- x. To manage risk and protect the sites, the services and you from fraud by verifying your identity. NoTi's risk and fraud tools use personal data, device information, technical usage data, and geolocation information from our sites and websites that offer NoTi services to help detect and prevent fraud and abuse of the services;
- xi. To comply with our obligations and to enforce the terms of our sites and services, including to comply with all applicable laws and regulations;
- xii. For our legitimate interests, including to:
  - Enforce the terms of our sites and services;
  - Manage our everyday business needs, such as monitoring, analyzing; manage risk, fraud, and abuse of NoTi services;
  - Anonymize personal data in order to provide aggregated statistical data to third parties, including other businesses and members of the public, about how, when, and why users visit our sites and use our services; and conduct business to business marketing;
  - Provide personalized services (also called interest-based marketing) offered by NoTi on third-party websites and online services. We may use your personal data and other information collected in accordance with this privacy statement to provide a targeted display, feature or offer to you on third-party websites;
  - Make it easier for you to find and connect with others. For instance, if you let us access your contacts or when your account profile is public, we can suggest connections with people you may know and help others connect with you to send you money by letting them find your profile when they search for you by name, username, email, or mobile number on NoTi;
  - We may also associate information that we learn about you through you and your contacts' use of the Services, and information you and others provide, to suggest people you may know or may want to transact with through our Services. Social functionality and features designed to simplify your use of the Services with others vary by Service.

xiii. With your consent, including: -

- To market to you NoTi products and services and the products and services of unaffiliated businesses. We may also process your Personal Data to tailor the marketing content and certain Services or Site experiences to better match your interests on NoTi and other third-party websites.
- To use cookies and other tracking technologies to provide a targeted display, feature, Service or offer to you and/or to work with other third-parties such as merchants, advertising or analytics companies to provide these personalized services (also called interest-based marketing).
- To provide you with location-specific options, functionality or offers if you elect to share your Geolocation Information through the Services. We will use this information to enhance the security of the Sites and Services and provide you with location-based Services, such as advertising, search results, and other personalized (also called interest-based marketing) content.
- To respond to your requests, for example to contact you about a question you submitted to our customer service team.
- You can withdraw your consent at any time and free of charge. Please refer to the section on “Your Privacy Choices” for more information on how to do that.

## **5. Do We Share Personal Data?**

We may share your Personal Data or other information about you with others in a variety of ways as described in this section of the Privacy Statement. We may share your Personal Data or other information for the following reasons:

i. With other members of the Pesa Print corporate family:

We may share your Personal Data with members of the Pesa Print family of entities to, among other things, provide the Services you have requested or authorized; to manage risk; to help detect and prevent potentially illegal and fraudulent acts and other violations of our policies and agreements and to help us manage the availability and connectivity of NoTi products, Services, and communications.

ii. With other companies that provide services to us:

We share Personal Data with third-party service providers that perform services and functions at our direction and on our behalf. These third-party service providers may, for example,

provide you with Services, verify your identity, assist in processing transactions, send you advertisements for our products and services, or provide customer support.

iii. With other financial institutions:-

We share Personal Data with other financial institutions that we have partnered with to jointly create and offer a product. These financial institutions may only use this information to market and offer NoTi-related products, unless you have given consent for other uses. We may also share Personal Data to process transactions, provide you with benefits associated with your eligible cards, and keep your financial information up to date.

iv. With the other parties to transactions when you use the Services, such as other Users, Merchants, and their service providers:

We may share information about you and your Account with the other parties involved in processing your transactions. This includes other Users you are sending or receiving funds from and Merchants, and their service providers. The information might include:

- Personal Data and Account information necessary to facilitate the transaction;
- Personal Data to help other participant(s) resolve disputes and detect and prevent fraud; and
- Anonymous data and performance analytics to help Merchants better understand the uses of our Services and to help Merchants enhance Users' experiences.

v. With other third parties for our business purposes or as permitted or required by law:

We may share information about you with other parties for Pesa Print's business purposes or as permitted or required by law, including:

- If we need to do so to comply with a law, legal process or regulations;
- To law enforcement authorities or other government officials, or other third parties pursuant to a court order or other legal process or requirement applicable to Pesa Print's corporate family;
- If we believe, in our sole discretion, that the disclosure of personal data is necessary or appropriate to prevent physical harm or financial loss or in connection with an investigation of suspected or actual illegal activity;
- To protect the vital interests of a person;
- With credit agencies and data processors for credit reference checks and anti-fraud and compliance purposes;

- To investigate violations of or enforce a user agreement or other legal terms applicable to any service;
- To protect our property, services and legal rights;
- To facilitate a purchase or sale of all or part of Pesa Print’s business;
- In connection with shipping and related services for purchases made using a service;
- To help assess and manage risk and prevent fraud against us, our Users and fraud involving our Sites or use of our Services, including fraud that occurs at or involves our business partners, strategic ventures, or other individuals, and Merchants;
- To banking partners as required by card association rules for inclusion on their list of terminated merchants;
- To credit reporting and collection agencies;
- To companies that we plan to merge with or be acquired by; and
- To support our audit, compliance, and corporate governance functions.

vi. With your consent:

We also will share your Personal Data and other information with your consent or direction, including if you authorize an account connection with a third-party account or platform.

In addition, Pesa Print may provide aggregated statistical data to third-parties, including other businesses and members of the public, about how, when, and why Users visit our Sites and use our Services. This data will not personally identify you or provide information about your use of the Sites or Services. We do not share your Personal Data with third parties for their marketing purposes without your consent.

## **6. How Do We Work With Other Services And Platforms?**

A significant benefit of NoTi’s Services is that you can connect your Account with a third-party account or platform. For the purposes of this Privacy Statement, an “account connection” with such a third-party is a connection you authorize or enable between your Account and a non-NoTi account, payment instrument, or platform that you lawfully control or own. When you authorize such a connection, Pesa Print and the third-party will exchange your Personal Data and other information directly. Examples of account connections include:

- i. Linking your Account to a social media account or social messaging service;
- ii. Connecting your Account to a third-party data aggregation or financial services company, if you provide such company with your Account log-in credentials; or
- iii. Using your Account to make payments to a Merchant or allowing a Merchant to charge your Account. If you choose to create an account connection, we may receive





information from the third-party about you and your use of the third-party's service. For example, if you connect your Account to a social media account, we will receive Personal Data from the social media provider via the account connection. If you connect your Account to other financial accounts, directly or through a third-party service provider, we may have access to your Account balance and transactional information, such as purchases and funds transfers. We will use all such information that we receive from a third-party via an account connection in a manner consistent with this Privacy Statement.

Information that we share with a third-party based on an account connection will be used and disclosed in accordance with the third-party's privacy practices. Before authorizing an account connection, you should review the privacy Notice of any third-party that you authorized to have an account connection that will gain access to your Personal Data as part of the account connection. For example, Personal Data that Pesa Print shares with a third-party account or platform such as a social media account may in turn be shared with certain other parties, including the general public, depending on the accounts or platform's privacy practices.

## **7. International Transfers**

Our operations are supported by a network of computers, cloud-based servers, and other infrastructure and information technology, including, but not limited to, third-party service providers.

The parties mentioned above may be established in jurisdictions other than your own and outside Kenya. These countries/areas do not always afford an equivalent level of privacy protection. We have taken specific steps, in accordance with GDPR and Data Protection Law in Kenya, to protect your Personal Data. In particular, for transfers of your Personal Data within Pesa Print related companies, we rely on internal data privacy policies. Other transfers may be based on contractual protections. Please contact us for more information about this.

If you make transactions with parties outside Kenya or connect our Service with platforms, such as social media, outside Kenya, we are required to transfer your Personal Data with those parties in order to provide the requested Service to you.

## **8. How Do We Use Cookies and Tracking Technologies?**

When you visit our Sites, use our Services, or visit a third-party website for which we provide online services, we and our business partners and vendors may use cookies and other tracking technologies (collectively, "Cookies") to recognize you as a User and to customize your online



experiences, the Services you use, and other online content and advertising; measure the effectiveness of promotions and perform analytics; and to mitigate risk, prevent potential fraud, and promote trust and safety across our Sites and Services. Certain aspects and features of our Services and Sites are only available through the use of Cookies, so if you choose to disable or decline Cookies, your use of the Sites and Services may be limited or not possible.

Do Not Track (DNT) is an optional browser setting that allows you to express your preferences regarding tracking by advertisers and other third-parties. We do not respond to DNT signals.

Please review our Statement on Cookies and Tracking Technologies to learn more about how we use Cookies.

## **9. What Privacy Choices Are Available To You?**

You have choices when it comes to the privacy practices and communications described in this Privacy Statement. Many of your choices may be explained at the time you sign up for or use a Service or in the context of your use of a Site. You may be provided with instructions and prompts within the experiences as you navigate the Services.

### ***Choices Relating to the Personal Data We Collect***

Personal Data: You may decline to provide Personal Data when it is requested by Pesa Print/ NoTi, but certain Services or all of the Services may be unavailable to you.

Location and other Device-level Information: The device you use to access the Sites or Services may collect information about you, including Geolocation Information and User usage data that Pesa Print/ NoTi may then collect and use. For information about your ability to restrict the collection and use of such information, please use the settings available in the device.

### **Choices Relating to Our Use of Your Personal Data**

Online Tracking and Interest-Based Marketing: We work with partners and third-party service providers to serve you advertising using ad-related cookies and web beacons. You can opt-out of third-party advertising-related cookies and web beacons, in which case our advertising should not be targeted to you. You will continue to see our advertising on third party websites.

For more information on third-party advertising-related cookies and interest-based marketing, and to learn how to opt-out of these practices with companies participating in industry self-regulation, please visit Your Online Choices.



Finding and connecting with others: If available, you may manage your preferences for finding and connecting with others from your Account of the Service you use.

### **Choices Relating to Account Connections**

If you authorize an account connection to a third-party account or platform, such as a social media account, you may be able to manage your connection preferences from your Account or the third-party account or platform. Please refer to the privacy notice that governs the third-party platform for more information on the choices you may have.

### **Choices Relating to Cookies**

You may have options available to manage your cookies preferences. For example, your browser or internet device may allow you to delete, disable, or block certain cookies and other tracking technologies. You can learn more by visiting [AboutCookies.org](http://AboutCookies.org). You may choose to enable these options, but doing so may prevent you from using many of the core features and functions available on a Service or Site.

You may have an option regarding the use of cookies and other tracking technologies when you use a Service or visit parts of a Site. For example, you may be asked if you want the Service or Site to “remember” certain things about you, and we will use cookies and other tracking technologies to the extent that you permit them.

You can learn more about our cookies and tracking technologies by visiting the [Statement on Cookies and Tracking Technologies](#) page.

### **Choices Relating to Your Registration and Account Information**

If you have an Account, you generally may review and edit Personal Data by logging in and updating the information directly or by contacting us. Contact us if you do not have an Account or if you have questions about your Account information or other Personal Data.

### **Choices Relating to Communication**

Notices, Alerts and Updates from Us:

*Marketing:* We may send you marketing content about our Sites, Services, products, products we jointly offer with financial institutions, as well as the products and services of unaffiliated third parties and members of the Pesa Print corporate family through various communication channels, for example, email, text, pop-ups, push notifications, and messaging applications. You may opt out of these marketing communications we send by following the instructions in



the communications you receive. If you have an Account with us, you may also adjust your communication preferences in your Account settings. For messages sent via push notifications, you may manage your preferences in your device.

*Informational and Other:* We will send communications to you that are required or necessary to send to Users of our Services, notifications that contain important information and other communications that you request from us. You may not opt out of receiving these communications. However, you may be able to adjust the media and format through which you receive these notices.

## **10. What Are Your Rights?**

Subject to limitations set out in the Kenyan Data Protection Laws, you have certain rights in respect of your Personal Data. In particular, you have a right of access, rectification, restriction, opposition, erasure and data portability. Please contact us if you wish to exercise these rights. If you wish to complete an access request to all personal data that Pesa Print holds on you, please note that photo identity will be required to prove your identity.

If you have an Account with any of our Services, you generally can review and edit Personal Data in the Account. We may use automated decision-making for decisions concerning credit with your consent.

Please contact us if you require more information on automated-decision making.

## **11. How Do We Protect Your Personal Data?**

We maintain technical, physical, and administrative security measures designed to provide reasonable protection for your Personal Data against loss, misuse, unauthorized access, disclosure, and alteration. The security measures include firewalls, data encryption, physical access controls to our data centers, and information access authorization controls. While we are dedicated to securing our systems and Services, you are responsible for securing and maintaining the privacy of your password(s), PIN and Account/profile registration information and verifying that the Personal Data we maintain about you is accurate and current. We are not responsible for protecting any Personal Data that we share with a third-party based on an account connection that you have authorized.

### **OR/AND**

We implement a variety of security measures to maintain the safety of your personal information when you place an order or enter, submit, or access your personal information.



We offer the use of a secure server. All supplied sensitive/credit information is transmitted via Secure Socket Layer (SSL) technology and then encrypted into our Payment gateway providers database only to be accessible by those authorized with special access rights to such systems, and are required to keep the information confidential.

## **12. Can Children Use Our Services?**

The Sites and Services are not directed to persons under the age of 18. We do not knowingly collect information, including Personal Data, from children or other individuals who are not legally able to use our Sites and Services. If we obtain actual knowledge that we have collected Personal Data from a person under the age of 18, we will promptly delete it, unless we are legally obligated to retain such data. Contact us if you believe that we have mistakenly or unintentionally collected information from a person under the age of 18.

### *Children's Online Privacy Protection Act Compliance*

We are in compliance with the requirements of COPPA (Children's Online Privacy Protection Act) and do not collect any information from anyone under 18 years of age. Our website, products and services are all directed to people who are at least 18 years old or older.

## **13. What Else Should You Know?**

### *Changes to this Privacy Statement.*

We may revise this Privacy Statement from time to time to reflect changes to our business, the Sites or Services, or applicable laws. The revised Privacy Statement will be effective as of the published effective date.

If the revised version includes a substantial change, we will provide you with 30 days prior notice by posting notice of the change on the "Policy Update" page of our website. We also may notify Users of the change using email or other means.

## **14. Contact Us**

Should you have any complaints, queries, concerns, general questions or complaints regarding our Services and or this Privacy Policy/ Statement, feel free to contact us. Reach out and we will get in touch as soon as possible.



Click here to contact us about your NoTi Account or transaction, or a card payment made to a Merchant.

## **15. Definitions**

*Data Controller* means that Pesa Print determines the purposes and means of the processing of Personal Data.

*Device Information* means data that can be automatically collected from any device used to access the Site or Services. Such information may include, but is not limited to, your device type; your device's network connections; your device's name; your device IP address; information about your device's web browser and internet connection you use to access the Site or Services; Geolocation Information; information about apps downloaded to your device; and biometric data.

*Geolocation Information* means information that identifies, with reasonable specificity, your location by using, for instance, longitude and latitude coordinates obtained through GPS or Wi-Fi or cell site triangulation.

*Pesa Print* means Pesa Print and subsidiaries or affiliates. In this Privacy Statement, Pesa Print is sometimes referred to as "we," "us," or "our," depending on the context.

*Personal Data* means information that can be associated with an identified or directly or indirectly identifiable natural person. "Personal Data" can include, but is not limited to, name, postal address (including billing and shipping addresses), telephone number, email address, payment card number, other financial account information, account number, date of birth, and government-issued credentials (e.g., driver's license number, national ID, passport number).

*Process* means any method or way that we handle Personal Data or sets of Personal Data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, and consultation, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction of Personal Data.

*Services* means any products, services, content, features, technologies, or functions, and all related websites, applications and services offered to you by Pesa Print.

*Sites* means the websites, mobile apps, official social media platforms, or other online properties through which Pesa Print offers the Services and which has posted or linked to this Privacy Statement.



*Technical Usage Data* means information we collect from your phone, computer or other device that you use to access the Sites or Services. Technical Usage Data tells us how you use the Sites and Services, such as what you have searched for and viewed on the Sites and the way you use our Services, including your IP address, statistics regarding how pages are loaded or viewed, the websites you visited before coming to the Sites and other usage and browsing information collected through Cookies.

*User* means an individual who uses the Services or accesses the Sites.