

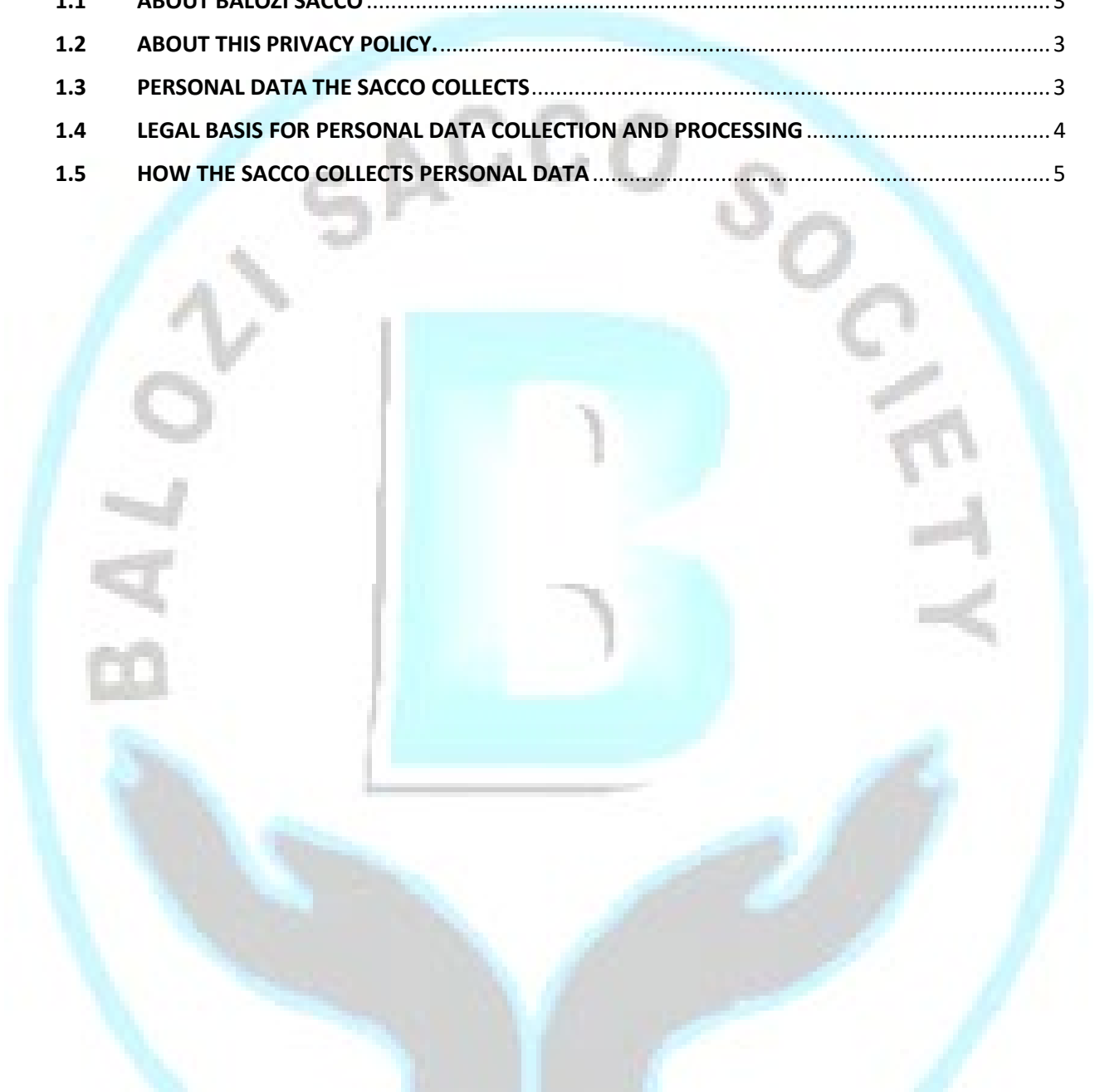
BALOZI SACCO SOCIETY PRIVACY POLICY.



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1.1 ABOUT BALOZI SACCO

Balozi Sacco are a duly registered Sacco in Kenya and regulated by SASRA to offer financial services to its members. The Sacco use the data subject personal data to provide and improve the services. By using these Services, the data subject agree to the collection and use of information in accordance with this policy.

1.2 ABOUT THIS PRIVACY POLICY.

The Sacco is committed to protecting the data subject personal data and respecting the data subject privacy.

This Privacy Policy explains in detail the types of personal data the Sacco may collect about the data subject when the data subject interacts with us through any of our contact points with a view of visiting our premises, requesting joining our membership, requesting for credit, savings depositing, general inquiries and membership exit.

The interaction points the data subject may have with us could be over the phone, in person, over email or indeed via our enquiry forms on our website or social media platforms. It also explains how we store and handle that data, keep it safe and tell the data subject about the privacy rights and how the law protects the data subject.

It is likely that the Sacco shall need to update this privacy policy from time to time. The Sacco shall notify the data subject of any significant changes.

1.3 PERSONAL DATA THE SACCO COLLECTS

The Sacco is data processors and controllers and is registered and regulated as such by the office of the Data protection commissioners in Kenya.

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (i.e., anonymous data).

The people whose personal data the Sacco collects and control include:

- i. Our Members and potential members
- ii. Employees
- iii. Other service providers whom the Sacco have a business relationship with.
- iv. Members' security providers and guarantors,
- v. Next of kin details.

The Sacco collect personal data such as:

Name, date of birth, Identification number, tax pin, financial information such as bank account details and statements, age, geographical information. The Sacco may also collect sensitive personal data such as sex, marital status, family details, belief, ethnic origin, biometric data etc.

1.4 LEGAL BASIS FOR PERSONAL DATA COLLECTION AND PROCESSING

a) Contractual Obligation:

In order to perform the contractual obligation entered into with our data subjects, the Sacco collects such personal data. For example, we provide our services based on the agreement the Sacco have with the data subject such processing of credit facilities for our members.

b) Consent.

The Sacco in specific situations collects and process the data subject data with the data subject consent. In doing so, the Sacco shall ensure that consent is requested from the data subject in an explicit manner.

The Sacco shall always make clear to the data subject, which data is necessary in connection with a particular service. All data provided by the data subject shall be used for legitimate purposes only and the organization undertakes to use such information only in connection with services offered

The Sacco shall also seek explicit consent when handling data pertaining to minors-children below 18 years of age from the parent, guardian or person holding responsibility of the said minor.

c) Legal compliance.

In the conduct of our business, the Sacco is required to comply with the specified industry regulators which would then oblige us to collect, process and share the data subject's information with the relevant regulators or law enforcement agencies such as Sacco societies regulatory authority (Sassra), credit reference bureau, Kenya revenue authority, national social security fund and any other formal requests from authorized agencies to fulfill a legal obligation.

d) Legitimate Interest

In specific situations, the Sacco may require the data subject's personal data to pursue legitimate interests in a way which might reasonably and legally be expected as part of running the services and which does not materially impact the data subject rights, freedom or interests.

1.5 HOW THE SACCO COLLECTS PERSONAL DATA

The Sacco use different methods to collect data from and about the data subject, including through:

- a) Direct interactions: When the data subject fill out forms such as membership or send inquiries and submit the same to us directly.
- b) When a data subject visits the premise.
- c) Closed circuit television (CCTV) surveillance recordings. CCTV Devices are installed at strategic locations to provide a safe and secure environment in all premises as a part of our commitment to community safety, security, and crime prevention.
- d) Through Automated interactions such as the Sacco's website.
- e) Third parties or publicly available resources