**PALLA CREDIT LIMITED DATA PRIVACY STATEMENT**

1. **Introduction.**

We value the privacy that you own and we therefore endeavor to treat your personal information carefully and responsibly. This privacy statement applies to your use of Palla services and describes the personal data Palla Credit (“Palla”) collects, processes, how it’s processed and for what purpose. This statement should be read together with the Terms and Conditions of use of Palla services and where there is a conflict, this statement shall take precedence.

This statement is applicable to all Palla customers, employees, contractors, suppliers and anyone visiting any of our company branches.

By accepting the terms of this privacy policy, you accept and consent to the practices described herein.

1. **Definitions**
   1. **Account** refers to a Unique file created for you that holds your information and help you access our services or part of our services.
   2. **Company (** referred to as either “the company”, “us”, “we”, “our” in this statement**)** refers Palla Credit Limited.
   3. **Consent** – an express that is specific, free, unequivocal and informed indicating the wishes of the involved parties
   4. **Cookies a**re little files that our websites save on your computer, mobile device, or any other device containing the details of your browsing history on the website among other many uses.
   5. **Personal Data –** Any information that relates to an identified or identified person
   6. **Sensitive Data** refers to a person’s information race, health status, beliefs, generic data, bio-metric data, ethnic social origin, property details, marital status, family information, sexual orientation, etc
   7. **Service** refers to the loan features provided by Palla to clients.
   8. **The Website** refers to Palla Credit Website accessed from <https://www.pallacredit.co.ke/>
   9. **You (**refers to customers, service providers, contractors, suppliers and visitors**)-** The individual or organization accessing or using our services
2. **The Data We May Collect About You**
   1. **Information that you provide.** In order to access our services, you will be requested and required to provide personal data as outlined in the applicable privacy policy. The information include the following:
      1. **Bio data** such as name, mobile number, gender, identification number, email address, physical address, business address, age, gender and other identifiers by which the company may use to contact you online and offline.
      2. **Personal and Sensitive information** collected through responses that you provide in our Application and Loan forms
      3. **Communications with Palla**, these includes information from call records, customer service requests, messages and comments on Palla online platforms.
      4. **Supporting Documents** these includes financial documents, authorization documents, government issued identification cards, etc
   2. **Information that we collect while you use our platforms.** We may also collect your data from your usage of our website through mainly acceptance of cookies settings in the website. The information may include:
      1. **Website Usage Details** such as forms inputs, website’s such history, IP address, among other information
      2. **Device Specifications** such as technical settings and features, device identifiers, device location, and user selected settings such as language and region.
   3. **Information that we receive from third parties.** In order to sufficiently provide you with our services and comply with our legal obligations, we may also obtain data from third parties. Such data includes:
      1. **Transactional data and repayments** from external debt collection agencies, our partners, mobile money operators, and mobile network providers.
      2. **Other accounts information** from financial service providers such as Safaricom Mpesa and financial institutions.
      3. **Credit Score** from credit scoring entities such as Credit Reference Bureau.
      4. **Anti-money laundering records** from financial sanctions screening vendors such as Oracle.
   4. **Withholding of personal data.** While you have a right to object to the collection of your personal and sensitive data, we may be unable to provide you with our services if you fail to provide any or all of the data that Palla requests.
3. **Use of Your Personal Data**

The company will only use your personal data where we have your consent or a legal basis to process the same. We will use your data in the following circumstances:

* 1. **To perform a contract.** Where we are about to enter or have entered into a contractual agreement with you
  2. **To manage your account.** This means to manage your registration in order to access our services as the user of our services.
  3. **To contact you.** We contact you through emails, SMS and phone contacts you provide in the registration to notify you about changes to our services, provide customer support, address technical and relations issues and provide you with news, special offers and general information about our services.
  4. **To study** how our customers use our services as well as testing of new products or services and to manage our brand.
  5. **To use data analytic** to better understand your credit needs and preferences and to improve our services, website, marketing and customer relationships and experiences.
  6. **To undertake surveys and reviews.**
  7. **To enforce our rights** under the agreement with you such as debt recovery and indemnification.
  8. **For Know Your Customer (KYC) formalities.** Done through identification, validation and verification of your identity to help in fraud detection and prevention of illegal use of our services.

1. **Disclosure/Sharing of Your Information**
   1. **We may disclose your personal data** to other entities with the affiliates of Palla Credit, for legitimate business purposes including providing services to you and operating our sites and systems, in accordance with the applicable laws. We may share your information with the following entities:
      1. **The Government,** including law enforcers, authorities and regulators such as Central Bank of Kenya and Credit Reference Bureau.
      2. **Service providers** to monitor and analyze the use of our service and to contact you.
      3. **Other Companies** that we work with to provide services to you such as mobile technology service providers, outsourced services vendors and debt collection agencies.
      4. **Other Financial institutions** through which your transactions are processed
      5. **Third parties with accruing legal obligations** e.g next of kin, trustees and executors and anyone holding a power of attorney to operate an account on your behalf.
      6. **Third parties who are service providers** acting as data processors, professional advisers including lawyers, bankers, auditors for consultancy purposes.
      7. **For Business transfers.** We may share or transfer your personal information in connection with, or during negotiations of any merge, sale of company assets, financing, or acquisition of all or a portion of our business to another company.
   2. **Law Enforcement.** Under certain circumstances, the company may be required to disclose your data if required to do so by law. Such circumstances include:
      1. To comply with legal obligations.
      2. To prevent or investigate possible illegal doings in connection with our services
      3. To protect or defend the rights or property of the company.
      4. To protect the safety of the members of the public.
      5. To protect against legal liability
   3. **All third parties are required to protect the security** of your personal data and treat it lawfully. We do not allow third-party service providers to use your data for their own interests, instead we only allow them to process it for certain purposes and according to our instructions.
   4. **Transfer of information to another jurisdiction.** We may need to transfer your information to another jurisdiction to fulfill a legal obligation, for our legitimate interest or to protect the public interest.
      1. Where third parties are based in other jurisdictions, the processing of your data will be in accordance with the data processing rules and regulations of their jurisdiction.
      2. If the other jurisdiction does not have the same level of protection for personal data, when we do process the data, we shall put in place appropriate safeguards such as contractual commitments to ensure the data is adequately protected.
2. **Retention of Your Personal Data.** The company will retain your personal data only for as long as necessary for the purposes set out in this privacy policy.
   1. **We will only retain your personal data** as long as is reasonably required to fulfill the purpose for which it was obtained including any legal, regulatory, tax, accounting or reporting obligations.
   2. **The period** of which we retain your information will depend on the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorized use or disclosure of your personal data, the purpose for which we process your data and whether we can achieve those purposes through other means.
   3. We are legally required to retain basic information for a minimum of seven years after they cease being customers. Our internal policy may require us to keep customer data for a longer period.
   4. In case of a complaint or if we reasonably believe there is a risk of litigation arising from our engagement with you, we may preserve your personal data for a longer period of time.
3. **Security of Your Personal Data.**

To safeguard your information from unauthorized access, collection, use, disclosure, coping, modification, disposal or similar risks, we have put in place appropriate administrative, physical and technical measures to secure all storage and transmission of data. Further, disclosing of data both internally and to our authorized third party service providers and agents is only on a need-to-know basis. Such measures include:

* 1. Employees screening, training, awareness, and confidentiality
  2. Asset management especially on company issued devices, systems, software, and applications used as inventories.
  3. Role-based access management and access control.
  4. Physical security
  5. Network security management
  6. Written agreement where appropriate.

1. **Your Subject Rights.**

With regard to the Data Protection Act 2019 among other applicable laws and regulations, you have the following rights regarding your personal data:

* 1. **Access-** You have the right to a copy of your processed data and the same is issued to you. Palla facilitates this by allowing you to fill in a request form at any of our branches.
  2. **Erasure-** You have the right to ask us to delete your personal data from our database if, for example, have no longer reason to process it.
  3. **Correction-** The right to ask for rectification of false, outdated, inaccurate, incomplete pr misleading data about you. This subject to verification through examination of supporting documents.
  4. **Objection-** The right to object the collection and processing of your personal data.
  5. **Portability-** For data that is in a structured, commonly used, and machine-readable format, you have the right to request your data be ported to another data processor or data controller.

1. **Data Involving Children.**

Our Services are not addressed to persons under the age of 18. We therefore do not knowingly collect personal information from anyone under the age of 18 without verification of parental consent. In case of such information being in our possession, we take necessary steps to ensure removal of the same from our servers.

1. **Data Privacy Review.**
   1. We keep this data privacy statement regularly under review. This may cause various changes that will be posted on our website and notified to you via email where appropriate
   2. It is important to us that the data we hold of you is accurate and updated. Please therefore keep us informed if your data changes during our relationship with you.
2. **Contact Us.**

If you have any concerns or questions regarding this data privacy statement or your rights related to the protection of your personal information, you can contact us:

By Email: [info@pallacredit.co.ke](mailto:info@pallacredit.co.ke)

By Phone number: 0722388009, 0705100090

By mail address: Palla Credit Limited, P.O Box 23325-00625, Nairobi