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Version: 2

Privacy Policy

Pivot Payments Limited under the Pivot Pay brand is committed to protect our Customers' Personal information and/or sensitive personal data. The policy describes how Pivot Payments Ltd protects the personal data it processes, why and how we collect and use your personal data and how you can exercise your rights in relation to the processing of your personal data. It is designed to protect your information and provide you with choices on how you would like your information managed, and is an important part of our relationship with you.

Definitions and Interpretation

- **“Pivot,” “We,” “our,” “ours,” and “us,”** means Pivot Payments Ltd and includes its successors in title and assigns.
- **“Personal data” or “personal information”** means: Information about you or information that identifies you as a unique individual, such as your name/s and surname combined with your physical address, contact details and/or passport/identity number.
- **“Processing”** collectively means handling, collecting, using, altering, merging, linking, organizing, disseminating, storing, protecting, retrieving, disclosing, erasing, archiving, destroying, or disposing of your personal information.
- **“Sensitive personal information”** includes data revealing your race, ethnic social origin, biometric data, mobile device contacts and sex or sexual orientation.
- **“You”** means:
 - a. Customer – (which includes personal representatives and assigns) operating an Account held with us and includes (where appropriate) any person you authorize to give us instructions, the person who uses any of our products and services or accesses our site. “Customer” shall also include juristic person.
 - b. Any agent, dealer and/or merchants who has signed an agreement with us and is recognized as a merchant or agent in accordance with any applicable laws or Regulations.

The word “includes” means that what follows is not necessarily exhaustive and therefore the examples given are not the only things/situations included in the meaning or explanation of that text.

Information Collection and Usage

All persons whose personal information is collected/received/possessed/stored or handled by the usage of the Pivotpay who use the Application are covered under this policy. The personal information received shall not be shared with third parties except as ordered by a court of competent jurisdiction, a regulatory or authorized governmental body.

The information we may collect includes those from your Application settings, Contact information, Location, Camera, Phonebook Contact Lists (including during account registration), and Photos.

Pivot will collect your personal information when you do any of the following:

- Make an application, or use any of our product and/or service or from third parties on our electronic and digital platforms.
- Use any of our product and/or service online, on a mobile or other device or with any of our agents or merchants.
- Ask Pivot for more information about a product or service or contact Pivot with a query or a complaint;

- Subscribe to any of our online services, Short Message Service (SMS), email or social media platforms;

These examples are non-exhaustive, which is reflective of the varied nature of the personal information we may collect.

What Information is collected?

From individuals who are our customers we may collect personal information that includes but is not limited to the following:

- Your identity information, including your title, name, photograph, nationality, occupation, location, phone number, identity document type and number, date of birth, age, gender & your email.
- Your transaction information when you use our electronic and digital platforms, our agents and/or merchants.
- Your preferences for particular products and services, based on information provided by you or from your use of our network or third party products and services.
- Your contact with us, such as when you: call us or interact with us through social media, email (we may record your conversations, social media or other interactions with us).
- Relevant information as required by regulatory Know Your Client and/or Anti Money Laundering regulations and as part of our client intake procedures.

Related Legal Entities

Corporate entities and clients form part of our client base. However, as part of our engagement with these clients, we may receive personal information about individuals which may include but is not limited to:

- full names.
- birth certificate number, national identity card number or passport number; personal identification number (PIN).
- nationality.
- date of birth
- postal and business address.
- residential address, telephone number and email address.
- occupation or profession.
- nature of ownership or control of the company.
- Number of Shares in the company.

These examples are non-exhaustive, which is reflective of the varied nature of the personal information.

Use of Personal Data

This privacy policy aims to give you complete and transparent information on how Pivot processes your personal data.

We may use personal data provided to us for any of the following purposes but are not limited to:

- Verifying your identity information through publicly available and/or restricted government databases to comply with applicable Know Your Customer (KYC) requirements.

- Assessing the purpose and nature of your business , your financial status and the capacity in which you are entering into the business relationship with us.
- Creating a record of you on our system to verify your identity, provide you with the products and/or services you have applied for from us or from third parties on our ecommerce platforms.
- Communicate with and keep you informed about the products and/or services you have applied for.
- Responding to any of your queries or concerns, we may record or monitor telephone calls between us so that we can check instructions and make sure that we are meeting our service standards
- Fraud prevention, detection and investigation
- To comply with any legal, governmental, or regulatory requirement or for use as and when need arises.

Transfer of Personal Data

Pivot may transfer your personal information for the purpose of effecting/implementing, administering, and securing any product or service that you have applied for or for other purpose set out in this privacy policy. We also share data with Pivot controlled affiliates and subsidiaries; with vendors working on our behalf; when required by law or to respond to legal process; to protect our customers; to protect lives; to maintain the security of our products; to comply with regulatory requirements and to protect the rights and property of Pivot and its customers.

We may transfer or disclose the personal data we collect to regulatory, fiscal or supervisory authority, partners on transaction enquiries, third party contractors, subcontractors, and/or their subsidiaries and affiliates who provides support to Pivot in providing its services. The third party providers may use their own third party subcontractors that have access to personal data (sub-processors). It is our policy to use only third party providers that are bound to maintain appropriate levels of security and confidentiality, to process personal information.

Cross-border transfers

From time to time we may need to transfer your personal information outside Uganda. This includes countries that do not have laws that provide specific protection to your personal data.

Where we send your information outside Uganda, we will make sure that there is proof of adequate data protection safeguards in the recipient country.

Retention of Personal Data

Pivot will retain your personal data only for as long as is necessary to achieve the purpose for which they were collected. We may retain your personal data and/or information for a period of up to Ten (10) years or as may be required by law and we maintain specific records management and retention policies and procedures, so that personal data are deleted after a reasonable time according to the following retention criteria:

- Where we have an ongoing relationship with you.
- To comply with a legal obligation to which it is subject.
- Where retention is advisable to safeguard or improve the Company's legal position.

Your rights

You have the right (in the circumstances and under the conditions, and subject to the exceptions, set out in applicable law to):

- Be informed that we are collecting personal data about you;
- Request access to your personal information that we have on record.

- Request Pivot to rectify any of your personal data that is incorrect or incomplete.
- Object to and withdraw your consent to processing of your personal data. This right entitles you to request that Pivot no longer processes your personal data. The withdrawal of your consent shall not affect the lawfulness of processing based on prior consent before its withdrawal. We may also continue to process your personal information if we have a legitimate or legal reason to do so.
- Request the erasure of your personal data. This right entitles you to request the erasure of your personal data, including where such personal data would no longer be necessary to achieve the purposes.

Data Integrity

We process personal information only for the purposes for which it was collected and in accordance with this Privacy Policy or any applicable service-specific privacy notice. We review our data collection, storage and processing practices to ensure that we only collect, store and process the personal information needed to provide or improve our services or as otherwise permitted under this Policy. We take reasonable steps to ensure that the personal information we process is accurate, complete, and current, but we depend on our users to update or correct their personal information whenever necessary.

Security

We take appropriate security measures to protect your data against unauthorized access to or unauthorized alteration, disclosure or destruction of data. These include internal reviews of our data collection, storage and processing practices and security measures, as well as physical and technical security measures to guard against unauthorized access to systems where we store personal data. The security of your account also depends on keeping your account password confidential, and you should not share your account name or password with anyone. If you do share your account information with a third party, they will have access to your account and your personal information.

Contact Us

Please contact our Data Protection Officer if you (i) have any questions or concerns about how Pivot processes your personal data or (ii) want to exercise any of your rights in relation to your personal data, on +256 393 252 361, +256 200 999 9740 or by writing to us on email: Info@pivotpayts.com

Amendments to this Policy

We may amend (add to or change) this information from time to time by posting a notice of the change at this site. Your continued use of our site or any online service following notification will constitute your agreement to any changes.