

# QuickLoan Mobile Ethical Data Review

By: **Joseph Lubandi** (Kigali office)

## Summary of Review Process

To conduct this review, I applied a **Data Lifecycle approach**, tracing the path of information from the moment of collection to its final use in analytics. By mapping this flow, I identified that the most critical failures occurred at the "Ingestion" and "Decision" stages.

Using **Data Classification** principles, I categorized the PII (Personal Identifiable Information) collected by QuickLoan—such as GPS and contact lists—as **Sensitive**. Under Ghana's Data Protection Act (Act 843), Sensitive data requires a much higher standard of care, including explicit consent and a clear purpose. QuickLoan's current "collect everything" strategy creates a massive legal liability because they lack a lawful basis for processing such intrusive data.

The proposed **Loan Approval Fairness Index (LAFI)** is the key to ensuring ethical governance. Automated models can often become "black boxes" where bias is hidden in complex math. By forcing the system to report approval rates across different demographic segments (like region or age), we create **Algorithmic Accountability**. This metric transforms abstract ethical goals into a clear, actionable dashboard. It ensures that as QuickLoan scales, it remains transparent to its users and compliant with Ghanaian law, proving that "fast" micro-loans don't have to be "unfair" loans.