

QuickLoan Mobile Ethical Data Review

By: Joseph Lubandi (Kigali office)

Corrected Data Flow Diagram

After reviewing the original diagram, here are the three essential corrections.

1. **Correction at Step 1 (The App): Implement Data Minimization.**
 - *Change:* Remove the "Contact List" and "Device Logs" collection.
 - *Why:* Under the **Principle of Minimization**, you should only collect data strictly necessary for the loan (e.g., identity and income).
2. **Correction at Step 2 & 3 (The Gateway): Add Consent Logging.**
 - *Change:* Insert a "Consent Receipt" step.
 - *Why:* To comply with **Act 843**, the database must store a record that the user actually clicked "I Agree" before their PII is saved.
3. **Correction at Step 7 (Decision Service): Transparency & Explainability.**
 - *Change:* Add an "Explainability Log" alongside the notification.
 - *Why:* If a loan is denied, the system must log why (e.g., "Income too low") so the company can provide transparency to the customer and auditors.

