



ZOGHORI SACCO DATA PRIVACY STATEMENT

Zoghori Cooperative Savings and Credits Society, (collectively “ZOGHORI SACCO”, “we” and “us”) respect your privacy and are committed to maintaining your trust. This Privacy Policy describes the types of Personal Data we collect on our SERVICE PLATFORMS, how we use Personal Data, with whom we share it with and your rights and choices with regards to your Personal Data. Please read this Privacy Policy carefully and ensure that it is understood as they ARE part of your agreement with ZOGHORI SACCO.

1. DEFINED TERMS

The following terms will have the meanings indicated below. Please refer to our Terms of Service for any capitalized terms that are not defined in this policy.

"Other Information" is any information that does not reveal your specific identity or does not directly relate to an individual, such as Services usage data.

"Personal Information" is information that identifies you as an individual or relates to an identifiable person, such as name, postal address, telephone number, email address, credit card number, and social media account ID. It does not include strings of code such as browser cookie IDs

Sometimes, we use the term "information" in this Privacy Policy, which may refer to either Personal Information or Other Information.

2. CATEGORIES OF PERSONAL INFORMATION

We need to collect Personal Information in order to provide the requested Services to you. The Personal Information we collect or obtain from you whenever you use the Service includes:

- Contact details (e.g., name, email, mobile number)
- Transaction data (e.g., purchase history), and
- Other Services related data (e.g. statistics).

3. HOW WE COLLECT INFORMATION

When you create an account on the Service Platforms, we may ask for Personal Information such as your name, email and phone number, social media account ID, and Other Information you may provide with your account. We may also store information that your computer or mobile device provides to us in connection with your use of the Services, such as IP address.

If you do not provide or enable us to collect the necessary information, we may not be able to provide the Services. If you disclose any Personal Information relating to other people to us or to our service providers such as network providers in connection with the Services, you represent that you have the authority to do so and to permit us to use the information in accordance with this Privacy Policy.

4. HOW PERSONAL INFORMATION MAY BE USED

We may use your Personal Information for legitimate business purposes or to comply with a legal obligation, including:

- To create, and administer accounts, fulfil and record transactions, and provide you with related assistance (e.g., technical help, answer inquiries relating to Personal Information, etc.)



- To send administrative information to you, for example, information regarding our Services and changes to our terms, conditions, and policies.
- To send you marketing communications and offer other materials that we believe may be of interest to you, such as to send you newsletters or other direct communications.
- To facilitate social sharing functionality if you choose to do so.
- For trending and statistics, and to improve our products and services.
- For audits, to verify that our internal processes function as intended and are compliant with legal, regulatory or contractual requirements.
- For fraud and security monitoring purposes, for example, to detect and prevent cyberattacks or attempts to commit identity theft.
- For responding to legal duties, such as requests from public and government authorities.

To the extent that we process your Personal Information based on your consent, you may withdraw your consent at any time.

5. HOW PERSONAL INFORMATION MAY BE DISCLOSED

We may disclose your Personal Information:

- To our strategic partners and third-party service providers who provide services such as data analysis, payment processing services, order fulfilment, information technology and related infrastructure provision, customer service, email delivery, credit card processing, auditing and other similar services.
- To business partners in the context of a corporate transaction. If ZOGHORI SACCO is involved in a sale or business transaction (e.g., merger or acquisition), ZOGHORI SACCO will retain a legitimate interest in disclosing or transferring your Personal Information to a third party in the event of any reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets or stock (including in connection with any bankruptcy or similar proceedings). Such third parties may include, for example, an acquiring or target entity and its advisors.

Please note that we may use and disclose Other Information for any purpose, except where we are required to do otherwise under applicable law. If we are required to treat Other Information as Personal Information under applicable law, then we may use it for all the purposes for which we use and disclose Personal Information. In some instances, we may combine Other Information with Personal Information. If we combine any Other Information with Personal Information, we will treat the combined information as Personal Information.

6. HOW TO ACCESS, CORRECT, DELETE OR EXERCISE OTHER RIGHTS REGARDING YOUR PERSONAL INFORMATION

If you would like to request to access, correct, object to the use, restrict or delete Personal Information that you have previously provided to us, or if you would like to request to receive an electronic copy of your Personal Information for purposes of transmitting it to another company (to the extent this right to data portability is provided to you by applicable law), you may contact ZOGHORI SACCO at privacy@zoghorisacco.com with the subject line "Data Subject Request." We will respond to your request consistent with applicable law.



For your protection, we may only implement requests with respect to the Personal Information associated with the particular email address that you use to send us your request, and we may need to verify your identity before implementing your request. We will try to comply with your request as soon as reasonably practicable.

Please note that we may need to retain certain information for recordkeeping purposes and/or to complete any transactions that you began prior to requesting a change or deletion (e.g., when you make a purchase, you may not be able to change or delete the Personal Information provided until after the completion of such purchase). There may also be residual information that will remain within our databases and other records, which will not be removed.

7. OPT-OUT

Information you provide may be used by ZOGHORI SACCO for marketing purposes such as one-off promotional emailing, mobile text messages, direct mail, and sales contacts. You may opt-out from receiving electronic communications from us if you no longer want to receive marketing-related emails or mobile text messages from us on a going-forward basis by sending a request for list removal to unsubscribe@zoghorisacco.com or by clicking the unsubscribe link in any marketing-related email sent to you by us.

We will try to comply with your request(s) as soon as reasonably practicable. Please also note that if you do opt-out of receiving marketing-related emails from us, we may still send you messages for administrative or other purposes directly relating to your use of the Services, and you cannot opt-out from receiving those messages.

8. TRACKING AND ADVERTISING

We and our third party service providers may collect Other Information in a variety of ways. We and/or our third party partners may employ various tracking technologies, such as cookies, web beacons and analytics software, that help us better manage content on the Services by informing us what content is effective.

9. SIGN-IN SERVICES

You can log in to some of the Services using sign-in services such as Facebook Login, Google OAuth, or an Open ID provider. These services will authenticate your identity and provide you the option to share certain Personal Information with us, such as your name and email address.

10. TESTIMONIALS, RATINGS AND REVIEWS

If you submit testimonials, ratings or reviews to the Services, any Personal Information you include may be displayed in the Service. If you want your testimonial removed, please contact us at support@zoghorisacco.com. We may also partner with third-party service providers to collect and display ratings and review content on our website.

11. THIRD PARTY PAYMENT PROCESSOR

We currently use third party payment processors as a Third Party Offering for internet based payment services. If you wish to make a payment through Services, your Personal Information may be collected by such processors directly and not by us, and will be subject to the third party's privacy policy. See Section 17 for a list of third parties and their applicable privacy policies. We have no control over, and are not responsible for, third parties' collection, use and disclosure of your Personal Information.

12. LIMITATION



Please note that we are not responsible for the collection, usage and disclosure policies and practices (including the data security practices) of other organizations, such as Facebook, Apple, Google, Microsoft or any other app developer, social media platform provider, operating system provider, wireless service provider or device manufacturer, including any Personal Information you disclose to other organizations through or in connection with the Services, including our social media pages.

13. DATA RETENTION

We will retain your Personal Information for as long as needed or permitted in light of the purpose(s) for which it was obtained and consistent with applicable law. The criteria used to determine our retention periods include:

- The length of time we have an ongoing relationship with you and provide the Services to you (for example, for as long as you have an account with us or keep using the Services);
- Whether there is a legal obligation to which we are subject (for example, certain laws require us to keep records of your transactions for a certain period of time before we can delete them); or
- Whether retention is advisable in light of our legal position (such as in regard to applicable statutes of limitations, litigation or regulatory investigations).

14. SECURITY OF YOUR INFORMATION

The security of Personal Information is a high priority at ZOGHORI SACCO. We seek to use reasonable technical, administrative and physical safeguards to protect Personal Information within our organization. Unfortunately, no data transmission or storage system can be guaranteed to be 100% secure.

15. CHANGES TO THIS PRIVACY POLICY

We may make changes to this Privacy Policy from time to time. Any changes we make will become effective when we post a modified version of the Privacy Policy to <https://zoghorisacco.com/privacy-policy>. If we make any material changes to the Privacy Policy, we may also notify you by posting notice within the applicable Services, or by sending you an email. If you continue using the Services after any notice of any such changes, it means you have accepted them. If you do not agree to any changes, you must stop using the Services, as applicable. It is your obligation to ensure that you read, understand and agree to the latest version of the Privacy Policy. The "Last Updated" legend at the top of the Privacy Policy indicates when it was last updated.

16. CONTACT US

If you have any questions regarding this Privacy Policy you can contact us via email at privacy@zoghorisacco.com.

17. THIRD PARTY SUB PROCESSORS

The following is a list of current third-party vendors that may either directly or indirectly collect information from you in their capacity as a sub processor. Please review the relevant privacy policies (links current as of the date of publication of this Privacy Policy) for further information on how each third party handles your Personal Information:



Third Party Name	Privacy Policy/Notice Link
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M-PESA	https://www.safaricom.co.ke/dataprivacystatement/
Zoghori Investments Limited	http://zoghoriinvestments.com/privacy.html
Zoghori Foundation	http://zoghorisacco.com/foundation/privacy.html