

MyMobi

Data Privacy Policy

1.0 Introduction

Your privacy is important to us. This privacy statement explains the personal data MyMobi ("MyMobi") collects, how MyMobi processes it, and for what purposes.

This statement should be read together with MyMobi Terms and Conditions for other MyMobi products and services. Where there is a conflict, this statement will prevail.

This statement applies to all customers, suppliers, agents and all visitors frequenting any of MyMobi premises.

2.0 Definitions

References to

2.1 "You" means:

- Customer- the person who subscribes to, uses or purchases any of our products and services or accesses our websites and includes any person who accesses any of the products and services you have subscribed to.
- Any vendor, partner or consumer who has signed an agreement with us and is recognised as a vendor or merchant in accordance with any applicable laws or Regulations.

2.2 "MyMobi", "we" or "us", "our" and "ours" means MyMobi

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.

3.0 Statement Details

3.1 Collection of Information

- 3.1.1 We collect your personal information with your knowledge and consent when you do any of the following (please note that this list is not exhaustive):
- a) register for a specific product or service;
 - b) buy, subscribe to or use a MyMobi product or service online, on the web, on a mobile or other device;
 - c) subscribe to MyMobi or third-party subscription premium rates services, Short Message Service (SMS), email or social media platforms;
 - d) ask MyMobi for more information about a product or service or contact MyMobi with a query or complaint;
 - e) respond to or participate in a survey;
 - f) visit, access or use MyMobi or third-party websites;
 - g) We may collect your information when you interact with us as a vendor, partner or consumer as prescribed in this statement;

3.2 What Information is collected?

The information we collect and store about you includes but is not limited to the following:

- 3.2.1 Your identity and SIM-card registration information, including your name, photograph, address, location, phone number, identity document type and number, employment number, employee, date of birth, email address, age, gender.
- 3.2.2 Your bank account details or other banking information.

- 3.2.3 Your preferences for particular products and services, based on information provided by you or from your use of MyMobi's (or third party) products and services.
- 3.2.4 Your contact with us, such as when you: call us or interact with us through social media, email or SMS mobile phone (we may record your conversations, social media or other interactions with us).
- 3.2.5 Your account information, such as your handset type/model

3.3 Use of Information

We may use and analyze your information for the following purposes:

- 3.3.1 Processing products and services that you have bought through MyMobi or from third parties through our application;
- 3.3.2 Billing you for using our or third-party products or services;
- 3.3.3 Responding to any of your queries or concerns;
- 3.3.4 Verifying your identity information through publicly available and/or restricted government databases in order to comply with applicable regulatory requirements;
- 3.3.5 Carrying out credit checks and credit scoring;
- 3.3.6 Keeping you informed generally about new products and services and contacting you with offers or promotions based on how you use our or third-party products and services unless you opt out of receiving such marketing messages (you may contact MyMobi at any time to opt out of receiving marketing messages);
- 3.3.7 to comply with any legal, governmental or regulatory requirement or for use by our lawyers in connection with any legal proceedings;
- 3.3.8 In business practices including to quality control, training and ensuring effective systems operations;
- 3.3.9 To understand how you use our products and services for purposes of developing or improving products and services;
- 3.3.10 For research, statistical, survey and other scientific or business purposes;
- 3.3.11 Administer any of our online platforms/websites.

3.4. Categories of Data

Categories of Personal Data as defined in the Data Protection Act of Kenya may be processed depending on the particular types of products and services you have subscribed to.

3.5. Lawful Basis for processing your information

We will process your personal information based on any of the lawful basis provided for under the Data Protection Law:

- 3.5.1 The performance of a Product/Service Agreement with you;
- 3.5.2 MyMobi's legitimate business interests;
- 3.5.3 Compliance with a mandatory legal obligation;
- 3.5.4 Consent you provide;
- 3.5.5 Public interest;
- 3.5.6 Your vital interest.

3.6. Retention of Information

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes

we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, the need to comply with our internal policy and the applicable legal, regulatory, tax, accounting or other requirements.

Anonymized information that can no longer be associated with you may be held indefinitely.

4.0 Disclosure of Information

4.1 Any disclosure of your information shall be in accordance with applicable law and regulations. MyMobi shall assess and review each application for information and may decline to grant such information to the requesting party.

4.2 We may disclose your information to:

- a) law-enforcement agencies, regulatory authorities, courts or other statutory authorities in response to a demand issued with the appropriate lawful mandate and where the form and scope of the demand is compliant with the law.
- b) our subsidiaries, associates, partners, software developers or agents who are involved in delivering MyMobi products and services you order or use;
- c) publicly available and/or restricted government databases to verify your identity information in order to comply with regulatory requirements;
- d) Survey agencies that conduct surveys on behalf of MyMobi;
- e) Any other person that we deem legitimately necessary to share the data with.

4.3 We shall not release any information to any individual or entity that is acting beyond its legal mandate.

4.4 We will get your express consent before we share your personal data with any third party for direct marketing purposes.

4.5 Direct Marketing

- 4.5.1 You may be required to opt in or give any other form of explicit consent before receiving marketing messages from us.
- 4.5.2 You can ask us to stop sending you marketing messages at any time by writing to us or logging into our website, www.MyMobi.co.ke and checking or unchecking relevant boxes to adjust your marketing preferences or by following the optout links on any marketing message sent to you or by attending to us or contacting us at any time through the provided contacts.
- 4.5.3 Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a product, service already taken up, warranty registration, product or service experience or other transactions].

5.0 The Use of Cookies

5.1 We may store some information (using "cookies") on your computer when you visit our websites. This enables us to recognize you during subsequent visits. The type of information gathered is non-personal (such as: the Internet Protocol (IP) address of your computer, the date and time of your visit, which pages you browsed and whether the pages have

been delivered successfully.

- 5.2 We may also use this data in aggregate form to develop customized services - tailored to your individual interests and needs. Should you choose to do so, it is possible (depending on the browser you are using), to be prompted before accepting any cookies, or to prevent your browser from accepting any cookies at all. This will however cause certain features of the web site not to be accessible.

6.0 The Use of Hyperlinks

- 6.1 MyMobi may provide hyperlinks to other locations or websites on the Internet. These hyperlinks lead to websites published or operated by third parties and have been included in on MyMobi to enhance your user experience.
- 6.2 We do not endorse, recommend, approve or guarantee any third- party products and services by providing hyperlinks to an external website or webpage. We are not in any way responsible for the content of any externally linked website or webpage.
- 6.3 By clicking on a hyperlink, you may leave the MyMobi webpage and accordingly you shall be subject to the terms of use, privacy and cookie policies of the other website that you choose to visit.

7.0 Access to and Updating your Information

To update your information, go to the menu on your MyMobi App to look at your personal information. You can change how we get in touch with you and your account details whenever you like.

8.0 Safeguarding and Protection of Information

MyMobi has put in place technical and operational measures to ensure integrity and confidentiality of your data via controls around: information classification, access control, cryptography, physical and environmental security and monitoring and compliance.

9.0 Your Rights

Subject to legal and contractual exceptions, you have rights under data protection laws in relation to your personal data. These are listed below: -

- a) Right to be informed that we are collecting personal data about you;
- b) Right to access personal data that we hold about you and request for information about how we process it;
- c) Right to request that we correct your personal data where it is inaccurate or incomplete;
- d) Right to request that we erase your personal data noting that we may continue to retain your information if obligated by the law or entitled to do so;
- e) Right to object and withdraw your consent to processing of your personal data. We may continue to process if we have a legitimate or legal reason to do so;
- f) Right to request restricted processing of your personal data noting that we may be entitled or legally obligated to continue processing your data and refuse your request.

10.0 Right to request transfer of your personal data in [an electronic format].

If you wish to exercise any of the rights set out above, please contact us on info@MyMobi.co.ke

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who

has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests within reasonable time. Occasionally it could take us longer if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

11.0 How to Contact Us

If you would like to contact us on any topics in this privacy policy, you can email us on info@MyMobi.co.ke or submit a request via our digital platforms.

As a Data Controller and Processor, below are the contact details of our Data Protection Officer:

Dennis Wanjiku
MFS Technologies Limited
Data Protection Officer
MyMobi
dwanjiku@mfs.co.ke

Capital West Business Centre, 5th Floor
Corner of Rhapta and Lantana Road
P O Box 66806 GPO 00800
Nairobi, Kenya
www.mfs.co.ke
www.mymobi.co.ke

12.0 Right to Lodge Complaint

You have the right to lodge a complaint with the relevant supervisory authority that is tasked with personal data protection within the Republic of Kenya

13.0 Non-Compliance with this Statement

MyMobi shall have the right to terminate any agreement with you for failure to comply with the provisions of this statement and reject any application for information contrary to this statement.

14.0 Amendments to this Statement

MyMobi reserves the right to amend or modify this statement at any time. If MyMobi amends this statement, You can access the most current version of the privacy statement on www.MyMobi.co.ke so that you will always know how your personal information is being used or shared.

Statement Effective Date

1st August 2024