

PNGME AND DTB PRIVACY POLICY

1. Introduction

Messier Inclusive Technology Limited (“Pngme”) and Diamond Trust Bank Kenya Limited (“DTB” or “Bank”) take the protection and security of your personal data very seriously. This privacy notice explains what data Pngme and DTB collect and process about you through your use of our products and services, the purposes of the data processing and how you can exercise your privacy rights. Pngme and DTB shall jointly be referred to as “We” “Us” or “Our”.

Pngme and DTB will be joint data controllers for the purpose of the processing envisaged by this Privacy Policy. Pngme will be the controller of your SMS Data (as defined below) while DTB will be the Controller of your personal data shared directly with the Bank and your User Data by Pngme for DTB.

Please read this privacy notice in its entirety.

2. Contact Details

Our respective registered addresses are as follows:

Messier Inclusive Technologies Inc dba Pngme
Nairobi, District: Westlands District,
Street: Muthangari Drive,
Building: The Address, Workstyle
Serviced Office Limited
NAIROBI

Diamond Trust Bank Kenya Limited
DTB Centre, Mombasa Road
P.O. Box 61711-00200
NAIROBI

3. What data do we collect and why?

Once you have consented, Pngme uses algorithms and predictive analytics applied to data accessed through a mobile SDK to provide a risk score and transactional data (“User Data”) to DTB from the mobile device. Pngme provides the User Data in relation to the digital loan that you are applying for at DTB. Pngme DOES NOT share your User Data with anyone else.

For illustrative purposes, this is an overview of how it will work:

- a) You may apply for a digital loan from DTB through DTB’s mobile application. To provide you with the credit, DTB needs to assess your creditworthiness.
- b) DTB will assess your creditworthiness using the financial information it already has about you as an existing account holder and information it obtains from credit checks with registered credit reference bureaus. However, DTB appreciates that it might not have your complete financial information e.g. details of your transactions with other financial and non-financial institutions.
- c) To enhance your “thin credit file” with DTB and enrich your credit score, DTB has partnered with Pngme to, subject to your consent, obtain your User Data.

- d) If you agree, Pngme will, through its SDK embedded on DTB's mobile application, collect specific personal information and/ or data (hereinafter "SMS Data" which is more particularized above) from your mobile device and process this SMS Data with Pngme's proprietary technology to generate User Data.
- e) Pngme will share your User Data with DTB for DTB to enrich your credit score.

Pngme will access and process SMS Data which can effectively be used in evaluating your credit score in the interest of you obtaining credit from DTB. The SMS Data may include:

- a) your phone number which will be shared by DTB;
- b) financial and credit information from your SMS messages which will be obtained by Pngme's SDK embedded in DTB's mobile application;
- c) technical information including the type of mobile device you use, unique device identifiers (for example, your Device's IMEI or serial number), your device operating system; and
- d) information stored on your device including SMS logs.

Pngme processes your SMS Data to assess your creditworthiness. Pngme will share your User Data (but in no event your personal data) with DTB. DTB will solely decide how it will respond to your application for a credit facility i.e. whether or not to grant your request for a credit facility and the limits of the facility. Pngme does not have visibility on, nor can it influence how DTB responds to you.

4. Our Legal Basis for Processing your User Data

Pngme only collects your SMS Data if you allow Pngme access to your SMS messages. Pngme will NOT and cannot extract your data without your consent. You may change and revoke Pngme's access to your SMS Data at any time by reviewing the permissions allowed to DTB's mobile application on your device settings.

5. Why We Collect/ Process Information

Pngme collects information for the following purposes:

- a) to build credit models and perform credit scoring;
- b) to analyze your behaviour
- c) to allow DTB to fulfill their obligations to you;
- d) to allow us to fulfill our obligations to DTB;
- e) to troubleshoot problems with its services;
- f) to comply with applicable laws, regulations, and rules, such as those relating to "know-your-customer" and anti-money laundering requirements; and
- g) to detect and prevent fraud and other illegal uses of our services.

Pngme will disclose your User Data to DTB when you apply for a digital loan with DTB for the purpose of DTB assessing your digital loan application.

6. Sharing of Your Information

As explained above, the User Data processed by Pngme's technology is not disclosed to any third party, except DTB. Pngme does NOT share the SMS Data collected from you with any person including DTB.

Neither DTB nor Pngme shall, without your prior consent, disclose any of your User Data to any other third party other than in the following circumstances:

- a) to any regulator or tax authority as required by law;
- b) pursuant to any orders of a competent court, tribunal or authority (including an authority investigating an offence);
- c) to Our employees in their capacity as persons entrusted with processing the data;
- d) to Our professional advisors, service providers or independent contractors, or agents of such parties who are under a duty of confidentiality;
- e) to anyone to whom We may transfer our rights to; and
- f) to Our associates, holding or subsidiary companies for the purpose of lending and/ or with the aim of developing new products and improving services and benefits to you with the understanding that information will be kept confidential.

7. Cross-Border Transfer of Personal Data

Your data may be transferred to, and processed in, countries other than Kenya. We have taken appropriate safeguards to require that your data will remain protected in accordance with this privacy notice. Such cross-border transfers will be made in compliance with the regulations in force.

8. Security Measures

In order to protect your personal data, We have put in place a number of technical and organisational measures. Technical measures include appropriate actions to address online security, risk of data loss, alteration of data or unauthorised access, taking into consideration the risk presented by the processing and the nature of the personal data being processed. Pngme's compute is stateless thereby minimizing surface area for attack vectors and opportunity for malicious code injection. All data in flight is encrypted and secure. Further, public exposure of services is exclusively via two sets of APIs and all other services are private and protected in Pngme's virtual private cloud.

Organisational measures include restricting access to the personal data solely to authorised persons under confidentiality agreements with a legitimate need to process personal data for the processing purposes stated in this privacy notice. Pngme segregates personal data from the processed and structured user financial data. Pngme only retains data that is necessary to run its services.

9. Period of Storage of Your Information

Regulations require Us to maintain and keep records for a minimum period of seven years from the date of the relevant business or transaction was completed or following the termination of an account or business relationship.

In general, We only keep your personal data for the time necessary to fulfil the purpose of collection or further processing, namely providing the required services. To determine data retention periods, We each take into account:

- a) our legal obligations under applicable law;
- b) our contractual obligations and rights;
- c) our legitimate interests; and
- d) potential disputes and necessity to be able to investigate any fraud, illegal activity or wrongdoing in connection with the services We offer.

Pngme may keep your stored SMS Data and User Data after you have revoked your consent to the collection for as long as is necessary for: the fulfillment of the purposes for which the SMS Data and User Data was obtained; for the establishment, exercise or defense of legal claims; for legitimate business purposes; or as permitted by law.

Once the respective purpose ceases to apply, we will either delete or anonymise the personal data or, if this is not possible (for example, because your personal data has been stored in backup archives), then we will securely store your data and isolate it from any further processing until deletion is possible.

If you wish, you can request the deletion of your personal data by sending an e-mail to Our respective Data Protection Officer's on the emails below.

10. Your Rights

As an individual, you have rights under the applicable laws regarding the use of your data, these are:

- a) The right to withdraw consent- you can withdraw consent at any time by reviewing the permissions allowed to DTB's mobile application on your device settings. Once you withdraw consent for Pngme's access to your messages, DTB can only offer digital credit based on your credit score obtained from your account activity with the Bank and credit checks with registered credit reference bureaus. The right to access your data- you have a right to know what data We hold on you and for what purpose we are processing your data.
- b) The right to erasure- you can request Us to remove your data from our systems.
- c) The right to restrict processing – you can request Us to only process your data for the purposes you specify.
- d) The right to data portability- you can request that the data you have provided to Us be transmitted to another organisation.
- e) The right to rectification- you have the right to ask Us to rectify any information you believe is inaccurate and to ask Us to complete information you think is incomplete.
- f) The right to object to processing- you have the right to object to processing unless We have legitimate grounds to continue the processing.
- g) The right to file a complaint with the Office of the Data Protection Commissioner (ODPC)- information and contact details of the ODPC can be found on the authority's website <https://www.odpc.go.ke/>

11. Changes to this Privacy Notice

We will inform you about substantial changes to this privacy notice and you may be required to read and accept them.

12. How to contact Our Data Protection Officer?

If you have any questions about this privacy notice or you would like to exercise one of your data protection rights or you wish to report a complaint/ concern, please do not hesitate to contact Our data protection officer at the below address:

Data Protection Officer of Pngme: cate@pngme.com

Data Protection Officer of DTB: dpo@dtbafrica.com