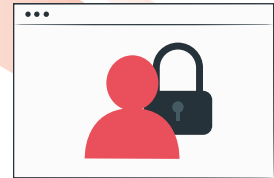




Data Privacy Policy and Notice

GENERAL INFORMATION AND CONTACT DETAILS



REPORTHUB LIMITED ("REPORTHUB", "we", "us" or "our") take the protection and security of your personal data very seriously. This privacy notice sets out the data we collect and process about you through our products and services, the purposes of the data processing and how you can exercise your privacy rights under the Data Protection Act.

You may be reading this notice because of a link provided by an organisation you are engaging (our customer), or you simply want more information on data processing in relation to our products and services.

Our customer and data supplier (you have engaged with) will have a lawful reason for collecting and processing your data and may have a separate relationship with you. It is separately required to provide you with information (for example through their own privacy notice) about how it collects and processes your data.

Our registered office address is at:

REPORTHUB LIMITED
P.O. BOX 486 – 00515
3rd Floor, Astrol House
Thika Road, Opposite Garden City
Nairobi, Kenya

Our Company Registration Number is: **PVT-AAAEKHO**

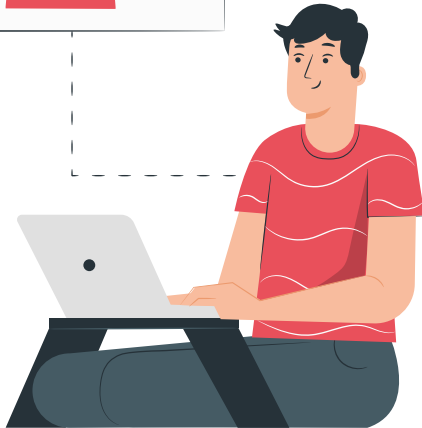
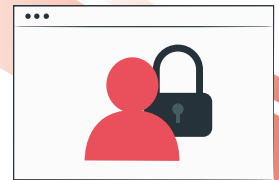
If you have any questions about how we use your data, please contact our Data Protection Officer by email at dataprotectionofficer@reporthub.co.ke.

We review this privacy notice on an annual basis, or sooner if changes to regulation require it or we change the way we process personal data.

This privacy notice was last updated on **October 1, 2022**.

Please read this notice if and when an organisation of your choice (our customer) has assigned to us your consent to access your personal information to provide business information services and any related support based on a separate agreement with us.

WHAT DO WE DO?



REPORTHUB is providing products and services to help financial and other organisations to meet their legal requirements and make real-time decisions.

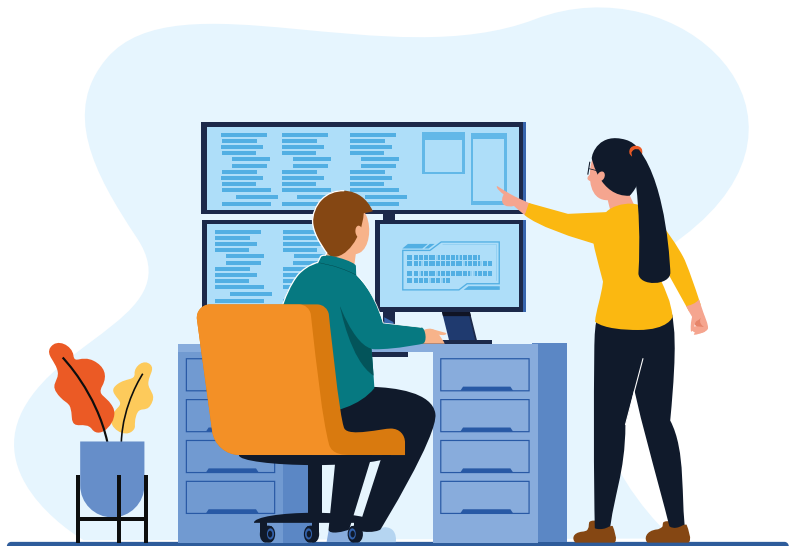
We collect, use and process personal data provided by you to produce business information reports and related support pursuant to the applicable data processing terms with the organisation you are interacting with (our customer).

We provide this business information report and related support only by or at the direction of the organisation you are engaged with (our customer). We do NOT share your business information report with anyone else.

REPORTHUB does not have visibility on, nor can we influence how the organisation of your choice responds to you.

WHAT DATA DO WE PROCESS AND WHY?

We collect processed data which may include the following categories: organizations profiles, shareholding/Directorship and management, registration details, principal activities, legal status as well as financial and other business information requested by the organisation you are interacting with.



Our legal basis for processing data

We collect or process your data only after we have also collected your consent either directly to us or via the organisation you are interacting with. We will NOT and cannot extract your data without your consent.



We do NOT request for your data from our customers (organisations that you have engaged with) without your consent and do NOT collect or process it without your consent. We/organisation that you have engaged with will only process your personal data in the following other situations:

- When we/they need to use your personal data to perform their responsibilities under terms and conditions accepted by you;
- When we/they have a legitimate interest in processing your personal data; and
- When we/they find such processing is necessary to comply with legal obligations.

When consent is the legal basis for our processing, you may withdraw such consent at any time, in accordance to applicable laws and regulations.

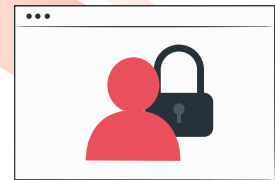
You can be assured that we protect the information we collect. By using our products or services, you agree to the collection, use, and sharing of your data in accordance with this privacy notice. You may change and revoke your 'access to data' permissions at any time by following the using the following means:

 info@reporthub.co.ke

 +254 711 310 310

Or: Visit the organisation that you have engaged with.

HOW DO WE USE AND PROTECT YOUR DATA?



We use your data to conduct due diligence and provide a business information report to the organisation of your choice (our customer). Organisation of your choice may use REPORTHUB's business information report as part of their decision process whether or not to grant you a loan or other financial service.

We handle all personal and sensitive user data securely, including transmitting it using modern cryptography (for example, over HTTPS). Although our mobile SDK may use some sensitive data, we use that data only to assess the application for a loan or a credit card with the organisation of your choice and not for advertising purposes.



Who will we share your data?

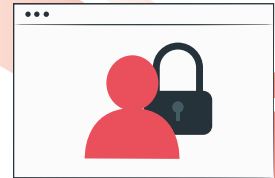
As explained above under "What do we do", the business information report is not disclosed to any third party, except for the financial organisation to which you have applied for a financial service (our customer).

We may also share your data in the following ways: when required by competent authority or necessary to comply with a valid legal process; when required to protect and defend the rights or property of REPORTHUB, including the security of our products and services; when necessary to protect the personal safety, property or other rights of the public, REPORTHUB or its customers or employees; or in connection with a sale of all or part of our business.

If we are involved in a merger, acquisition or asset sale, we will abide by this privacy notice, and any affected users will be informed if we transfer any personal data to a third party or if personal data becomes subject to a different privacy notice as a result.



TRANSFERS OUTSIDE OF KENYA



Your data may be transferred to, and processed in, countries other than the country in which you are resident. These countries may have data protection laws that are different to the laws of your country.

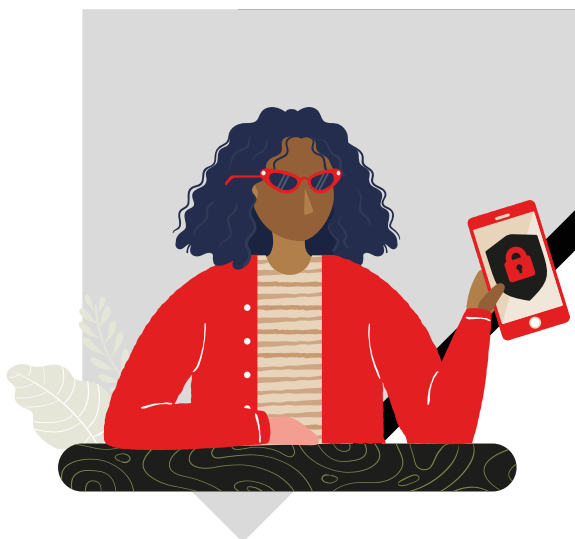
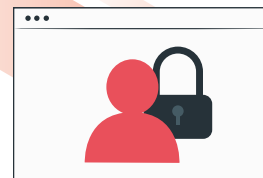
Our group companies, data suppliers, customers and third-party service providers operate around the world. This means that when we collect your data we may process it in any of these countries.

However, we have taken appropriate safeguards to require that your data will remain protected in accordance with this privacy notice.

These include implementing the Standard Contractual Clauses for transfers of data between our group companies, which require all group companies to protect data they process from Kenya in accordance with Kenya data protection law.

Our Standard Contractual Clauses can be provided on request. We have implemented similar appropriate safeguards with our data suppliers, customers and third-party service providers and partners and further details can be provided upon request.

HOW LONG DO WE RETAIN YOUR DATA FOR IN OUR PRODUCTS AND SERVICES?



We retain the data we collect from you for the length of time necessary to fulfil the specific purpose or purposes for which it has been collected. We may also keep it to comply with our legal obligations, resolve any disputes and enforce our rights.

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.

To implement and improve the functionality of REPORTHUB's technology and to update the credit scorecards developed for our clients, we will keep your data for up to 3 (three) years unless you or organisation of your choice (our customer) request us to delete your data at an earlier date.

If you have questions about or need further information concerning how long we keep your data for, please contact us using the contact details provided below.

Your rights under the GDPR

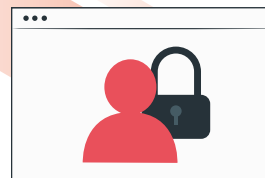


Due to how REPORTHUB process data, your personal data is pseudonymised, therefore we are unable to fulfil your rights directly as it is not possible for REPORTHUB to identify you as an individual.

To exercise any of the right outlined below, please consult with the organisation you have been interacting with. They will then be able to provide REPORTHUB with information to assist in exercising your rights.

GDPR

General Data Protection Regulation

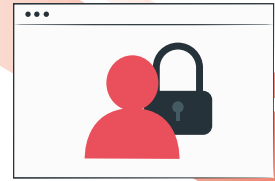


As an individual, you have rights under the GDPR regarding the use of your data, these are:

- The right to withdraw consent – you can withdraw consent at any time.
- The right to erasure – you can request that REPORTHUB remove your data from our systems.
- The right to restrict processing – you can request that REPORTHUB only process your data for the purposes you specify.
- The right to data portability – you can request that the data you have provided to REPORTHUB be ported to another organisation.
- The right to access your data – You have a right to know what data REPORTHUB hold on you and for what purpose we are processing your data. This is known as a Subject Access Request (SAR).
- The right to rectification – you have the right to ask us to rectify any information you believe is inaccurate. You also have the right to ask us to complete information you think is incomplete.
- The right to object to processing – you have the right to object to processing if we are able to process your information because the processing is in our legitimate interests.

You are not required to pay any charge for exercising your rights. We have one calendar month to respond to you. If REPORTHUB are unable to comply with your request, we will provide you with an explanation.

HOW TO CONTACT US IF YOU'RE NOT HAPPY



We appreciate that at REPORTHUB we may not always get things right and it is regrettable for us as an organisation when we receive a complaint. We take all complaints seriously and can assure you we will do our best to deliver a satisfactory outcome. If you do wish to complain about how your personal data is used by REPORTHUB then please write to us at:

 dataprotectionofficer@reporthub.co.ke

You may also contact us by mail at:

REPORTHUB LIMITED
P.O. BOX 486 – 00515
3rd Floor, Office 301C, Astrol House
Thika Road, Opposite Garden City
Nairobi, Kenya

REPORTHUB will investigate your complaint and aim to respond within 10 working days. This allows us time to investigate your complaint thoroughly.

Your right to lodge a complaint with the Supervisory Authority
Where you believe that REPORTHUB have not taken our responsibilities with your data seriously, you have the right to complain to the Office of the Data Protection Commissioner.





REPORTHUB

Information with Power

