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# PRIVACY STATEMENT

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## 1.0 PRIVACY STATEMENT.

This privacy policy explains how AMREF regulated NON WDT SACCO handles the processing of your personal information. We are dedicated to prioritizing and protecting your privacy and ensuring that your personal data is handled with utmost care and security, which continues to be our top priority.

### 1.1 DEFINITIONS.

1. **AMREF regulated NON WDT SACCO** means national savings and credit co-operative that was registered on 7th September 1983 by a group of staff from AMREF under the Co-operative Societies Act (Cap490) Laws of Kenya
2. **Data Protection Officer** is a person designated or appointed by the SACCO to monitor compliance with the Data Protection Act, No. 24 of 2019 and the Regulations made under the Act.
3. **Data Collection** means gathering of information that relates to you.
4. **Personal data** means Information that directly or indirectly identifies or says something about you is referred to as personal data. Examples include your name and address, and information such as your income.
5. **Data Processing** means any operation or sets of operations which is performed on your personal data whether or not by automated means, such as: collection, recording, organization or structuring; Storage, adaptation or alteration; Retrieval, consultation or use; Disclosure by transmission, dissemination, or otherwise making available; Alignment or combination, restriction, erasure or destruction.
6. **Third Party** - means a natural or legal person, public authority, agency or body other than you AMREF regulated NON WDT SACCO and, who under the direct authority of AMREF regulated NON WDT SACCO are authorized to process your personal data.

### 2.0 PERSONAL DATA COLLECTED BY THE SACCO.

AMREF SACCO will collect, utilize, retain, and transmit a variety of Personal Data related to you, which can be categorized as follows:

1. Identity data: This comprises information such as your name, username, ID/passport number, photograph, nationality, age, title, date of birth, gender, and other related information.
2. Contact data: This includes details such as your postal address, physical address, email address, and telephone numbers.
3. Financial data: This consists of your bank account number, bank statements, payslip, card payment details, and other electronic or non-electronic payment details.
4. Transaction data: This pertains to information about payments to and from you, as well as other details regarding the products and services you have acquired from us and third parties.

5. Technical data: This encompasses details such as your internet protocol (IP) address, login identity data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology associated with the devices you use to access our systems; please refer to our cookie policy.
6. Profile data: This includes information about your profile identification, such as your product preferences, feedback, and survey responses.
7. Usage data: This involves information about how you use our website, products, and services.
8. Marketing and communications data: This pertains to your preferences regarding receiving marketing information from us and our third parties, as well as your communication preferences.

### **3.0 PURPOSES FOR COLLECTION, USE, DISCLOSURE AND PROCESSING OF PERSONAL DATA.**

We may collect, use, disclose, and process your personal data for various purposes, including providing services to you and fulfilling our legal and regulatory obligations. The specific purposes for processing your personal data may include, but are not limited to, the following:

- a. Processing your inquiries, applications for account opening, loan processing, and requests for products and services.
- b. Providing you with products and/or services, facilitating transactions, and ensuring their proper execution.
- c. Administering and managing your relationship and/or account(s) with us, which may involve outsourcing certain functions to authorized service providers or third-party vendors.
- d. Carrying out your instructions and responding to your inquiries.
- e. Conducting due diligence and screening activities, such as background checks, to meet legal or regulatory requirements or risk management procedures related to combating financial crime, know-your-customer practices, anti-money laundering, counter-terrorist financing, or anti-bribery measures.
- f. Handling matters related to the products and/or services provided under our agreement(s) with you, including printing and mailing correspondence, statements, invoices, confirmations, advices, information, reports, or notices, which may require the disclosure of certain personal data for delivery purposes.
- g. Reviewing and approving accounts, conducting credit checks and assessments, ongoing verification of creditworthiness, and evaluating credit standing.
- h. Preventing, detecting, and investigating crime, fraud, misconduct, unlawful actions or omissions, whether relating to your application or any other matter concerning your account(s), and regardless of any suspicion.
- i. Monitoring and recording voice or video conferences and electronic communications for record keeping and quality training purposes.
- j. Publishing your feedback at internal and external events, feedback exercises, and as part of marketing and promotional activities.
- k. Processing and/or storing information related to your relationship with us.

- l. Complying with applicable laws, regulations, guidelines, and notices in administering and managing your relationship with us.
- m. Informing you of any other purposes at the time of obtaining your consent.

Please note that the specific purposes for processing your personal data may not be limited to the ones mentioned above. We will inform you of any additional purposes at the time of obtaining your consent, unless processing your personal data without consent is permitted by the PDPA (Personal Data Protection Act) or by law.

#### **4.0 DURATION FOR HOLDING PERSONAL INFORMATION.**

The Sacco will keep personal information for only as long as necessary and will not hold onto it if it is no longer needed. However, there may be situations where the Sacco is legally obligated to retain a data subject's personal information, such as for finance, employment, or audit purposes.

#### **5.0 MEMBER DATA RIGHTS AT THE SACCO.**

You have several rights regarding your personal data that the SACCO holds and processes.

- a) You have the right to access all the information we have about you.
- b) You have the right to be forgotten which means you may ask us to erase any data we have about you.
- c) If you believe that any of your personal data, we have is incorrect or incomplete, you can request us to rectify it.
- d) You may request that we restrict the processing of your personal data, which means we will handle less data about you.
- e) You have the right to object to receiving direct marketing from the SACCO and can make such a request by visiting, emailing, or calling us.

#### **6.0 COMPLAINTS.**

If you have any concerns or complaints regarding the protection of your personal information, including its collection or processing by AMREF SACCO, please get in touch with us via [info@amrefsacco.org](mailto:info@amrefsacco.org).

#### **7.0 AMREF SACCO RIGHTS.**

AMREF SACCO retains the right to modify this statement at any given time. Any alterations to this statement will be published on our website. The most recent version will take precedence and replace all prior versions of the policy, unless expressly stated otherwise.