

Privacy Policy

Introduction

The Company (hereinafter defined below) respects the privacy and is committed to protecting the personal data of Cardholders.

This privacy policy will inform you about our policies and practices regarding the collection, use and disclosure of personal information when you use our Banking as a Service (BaaS) and when you visit our website or use our application (irrespective of your location) and tell you about your privacy rights and how the law protects you.

Please use the Glossary to understand the meaning of some of the terms used in this privacy policy.

1. Important information and who we are

- Purpose of this privacy policy

This privacy policy aims to give the Cardholders information on how the Company collects and processes the personal data provided to us by the Cardholder's business and through your use of this website and/or app, including any data you may provide through this website/app when you sign up thereto for the purpose of availing our card services.

This website/app is not intended for children, and we do not knowingly collect data relating to children. For the purpose of this policy children means all persons whose age is less than 18 years old. The businesses are responsible for ensuring that you have given your explicit consent, as the Data Subject and Cardholder, before sharing your personal data with us.

- Controller

Connect is the controller and responsible for your personal data (collectively referred to as the "**Company**", "**we**", "**us**" or "**our**" in this privacy policy).

- Changes to the privacy policy and our duty to inform you of changes.

We keep our privacy policy under regular review accordingly, we reserve our right to amend any part of this policy as to better provide you with our services and remain in strict compliance with the applicable laws. We will send you notifications of any changes made to this policy.

It is important that the personal data we hold about you shall remain accurate and current. Please keep us informed if your personal data changes during your relationship with us.

- Third-party links

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

2. The data we collect about the Cardholders using our services through your business

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

When a business collaborates with us, they will provide us with personal data of individuals who will be using our cards. Such data will be used strictly in accordance with this policy and for the intended purposes of processing.

We may collect, use, store and transfer different kinds of personal data about you when you create an account, subscribe, or participate in interactive features, fill out forms, request customer support or communicate with us, which we have grouped together as follows:

- **Identity Data:** includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.
- **Contact Data:** includes billing address, delivery address, email address and telephone numbers.
- **Financial Data:** includes bank account and payment card details.
- **Phone Data:** includes your contacts, location, SMS logs and phone logs.
- **Transaction Data:** includes details about payments to and from you and other details of products and services you have purchased from us.
- **Technical Data:** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, installed apps, and other technology on the devices you use to access this website.
- **Profile Data:** includes your username and password, and your activities on our website, your interests, preferences, feedback and survey responses.
- **Usage Data:** includes information about how you use our website, products and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We collect data from your phone to provide a segmented risk profile and generate an aggregated statistical information. To protect your identity, we remove all personal identifiers (if any) and pseudonymise such information. Any metadata processed in this way cannot be used to reproduce the original data collected.

We also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us, but we will notify you if this is the case at the time.

3. How is your personal data collected?

In the B2B context, personal data is primarily collected directly from businesses. The business sharing the personal data they have collected shall ensure that they have the appropriate rights to do so. We use different methods to collect data from and about you, including, through:

- **Direct interactions.** You may give us your Identity, Contact and Financial Data by filling in electronic forms or by corresponding with us by phone, email or otherwise. This includes personal data you provide when you:

- create an account on our application;
 - fill out our KYC;
 - request marketing to be sent to you;
 - enter a competition, promotion or survey; or
 - give us feedback or contact us.
- **Automated technologies or interactions.** As you interact with our website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Please refer to the relevant section tackling the Cookies in our terms and conditions at the following link: [\[insert link\]](#) for further details.
- **Third parties or publicly available sources.** We will receive personal data about you from various third parties and public sources as set out below:
- Technical Data from the following parties:
 - analytics providers;
 - advertising networks; and
 - search information providers.
 - Contact, Financial and Transaction Data from providers of technical, payment and delivery services.

We also collect anonymous data from every visitor of the app/website to monitor traffic and fix bugs. This includes information such as web requests, the data sent in response to those requests, Internet Protocol (IP) addresses, browser types, browser languages, and timestamps for the requests.

4. How we use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform our obligations as set out in the contract we are about to enter into or have entered into with you. We use the data as part of our decision process to assess your creditworthiness for a credit with us.
- We may also use your data to assess your interest in receiving financial services through algorithms and mathematical modeling. Sharing your data with Connect helps us approve your installment application.
- Location: Collecting location data improves your user experience by allowing us to show you the best possible nearby offers. It also greatly improves our ability to assess credit risk and offer you the best possible credit rates and products.
- To carry out Your request: Sharing your information in order to fulfill your specific requests or instructions.
- Fraud Prevention and Security: we may share your information if we believe it is necessary to detect, prevent, or address fraud, security, or technical issues.

- **Contacts:** We collect contact list data so we can offer person-to-person transactions, to verify references and for customized credit risk assessment.
- **SMS:** In order to offer you market-leading credit, we confidentially collect data from SMS logs to assess credit risk.
- **Calls:** In order to offer market-leading financial products, we confidentially collect call data to assess credit risk. Connect is committed to transparency, security and fraud prevention.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal obligation.

Please refer to the legal basis term set out in the Glossary as to have a better understanding of the contemplated matter.

Businesses shall ensure that the Cardholders are informed about, and have provided their explicit consent for, the sharing of their personal data with us. We will also seek your consent for processing your personal data that you provide directly on our application and when the processing of your data is for the purpose of sending third party direct marketing communications to you via email or text message.

You have the right to withdraw consent to marketing at any time by contacting us. The data collected is shared with selected and authorized providers of data analytics services. The service providers are described in Section 9 under Third Parties.

Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new customer	<ul style="list-style-type: none"> ▪ Identity ▪ Contact 	Performance of a contract with you
To process and deliver your order including: <ul style="list-style-type: none"> ▪ Manage payments, fees and charges. ▪ Collect and recover money owed to us 	<ul style="list-style-type: none"> ▪ Identity ▪ Contact ▪ Financial ▪ Transaction ▪ Phone ▪ Marketing and Communications 	<ul style="list-style-type: none"> ▪ Performance of a contract with you ▪ Necessary for our legitimate interests (to recover debts due to us) ▪ To accurately assess credit risk and offer you the best products suited to your needs. ▪ Collecting contact data allows us to offer person-to-person transactions and to verify references and to better perform customized credit risk assessment. ▪ Installed apps allow us to assess your creditworthiness and to assess your interest in receiving financial services through algorithm and mathematical modeling.

		<ul style="list-style-type: none"> Collecting SMS logs and calls confidentially is necessary for us to offer you market-leading credit and to assess credit risk.
<p>To manage our relationship with you which will include:</p> <ul style="list-style-type: none"> Notifying you about changes to our terms or privacy policy Asking you to leave a review or take a survey. To improve our services to you via obtaining as much accurate information from you as feasible. 	<ul style="list-style-type: none"> Identity Contact Profile Marketing and Communications 	<ul style="list-style-type: none"> Performance of a contract with you Necessary to comply with a legal obligation. Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services) Collecting location data allows us to improve user experience by showing you the best available offers near you and to assess credit risk and offer you optimal credit rates and products.
<p>To enable you to partake in a prize draw, competition or complete a survey.</p>	<ul style="list-style-type: none"> Identity Contact Profile Usage Marketing and Communications 	<ul style="list-style-type: none"> Performance of a contract with you Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business).
<p>To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)</p>	<ul style="list-style-type: none"> Identity Contact Technical 	<ul style="list-style-type: none"> Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganization or group restructuring exercise). Necessary to comply with a legal obligation. Necessary for transparency, security and fraud prevention.
<p>To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you.</p>	<ul style="list-style-type: none"> Identity Contact Profile Usage Marketing and Communications Technical 	<ul style="list-style-type: none"> Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy).
<p>To use data analytics to improve our website, products/services, marketing, customer relationships and experiences</p>	<ul style="list-style-type: none"> Technical Usage 	<ul style="list-style-type: none"> Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
<p>To make suggestions and recommendations to you about goods or services that may be of interest to you</p>	<ul style="list-style-type: none"> Identity Contact Technical Usage Profile Marketing and Communications 	<ul style="list-style-type: none"> Necessary for our legitimate interests (to develop our products/services and grow our business)

Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

Promotional offers from us

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing). You will receive marketing communications from us if you have requested information from us or purchased services from us and you have not opted out of receiving that marketing.

Third-party marketing

We will get your express opt-in consent before we share your personal data with any third party for marketing purposes. We acknowledge the trust you place in us. Any sharing of data with third parties in the B2B context will be communicated clearly to you. Such sharing will be done only with your explicit consent or where legally mandated.

Opting out

The Company understands the importance of maintaining control over your communication preferences. You can ask us or third parties to stop sending you marketing messages at any time by unchecking relevant boxes to adjust your marketing preferences or by contacting us at any time. Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of service purchase, warranty registration, product/service experience or other transactions.

To do so, please specify and adjust your preferences accordingly on this website/app.

Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly.

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so (if any). Otherwise, we will not use your personal data for unrelated purposes without the business confirming that they have obtained your prior written approval.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

5. Disclosures of your personal data

The Company does not share your personal data, however, We may share periodically your personal data which is aggregated and anonymized data provided by the business or by you through our application with the parties set out below to help us improve this app/website and services and for the purposes set out in the table [Purposes for which we will use your personal data] above.

- Third Parties as set out in the Glossary.
- Third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our

business, then the new owners may use your personal data in the same way as set out in this privacy policy.

- The Company may also allow third parties to provide analytics services, which may involve the use of cookies, web beacons, and other technologies to collect information about your use of our services and other websites. This information may include your IP address, web browser, pages viewed, time spent on pages, links clicked, and conversion information.
- The company utilizes social buttons provided by services like Twitter, Google+, LinkedIn, and Facebook. Please note that your use of these third-party services is entirely optional. We are not responsible for the privacy policies and/or practices of these third-party services, and it is your responsibility to read and understand their privacy policies.

We require all third parties to respect the security of your personal data provided by you and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

6. Data security

We have put in place appropriate security measures to prevent your personal data provided by businesses or by you from being accidentally lost, used or accessed in an unauthorized way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality.

However, it is important to keep in mind that no Internet transmission is ever completely secure or error-free.

While we strive to ensure the security of your information, we cannot guarantee its absolute protection. Please exercise caution when sharing personal information online.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

7. Data retention

How long will you use my personal data for?

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 unauthorized 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, and the applicable legal, regulatory, tax, accounting or other requirements.

We have to keep basic information about our Cardholders (including Contact, Identity, Financial and Transaction Data) for five years after they cease being customers for tax purposes.

In some circumstances you can ask us to delete your data: see your legal rights below for further information.

In some circumstances we will anonymize your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

8. Your legal rights

Under certain circumstances, the rights described in this section under data protection laws apply to Cardholders whose data has been shared with us by businesses or by these individuals directly through our application in relation to their personal data. Businesses shall inform the Cardholders about their rights and ensure they can exercise them at any time. Please check “The legal rights of Cardholders” section to find out more about these rights:

- Request access to your personal data.

- Request correction of your personal data.
- Request erasure of your personal data.
- Object to processing of your personal data.
- Request restriction of processing your personal data.
- Request transfer of your personal data
- Right to withdraw consent.

If you wish to exercise any of the rights set out above, you may inform the business, which will subsequently contact us on their behalf.

No fee usually required.

You will not have to pay a fee to access your personal data provided by the business or by you (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances

What we may need from you

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.

Time limit to respond

We try to respond to all legitimate requests within six working days. Occasionally it could take us longer than a month 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.

9. Account Deletion

You have the right to delete your account by selecting “Quick Help” and contact our Customer Support to inform them of your wish to delete your account. Please note that we may retain user data after your deletion request for a legally prescribed period of time in conformity with any local legal or regulatory requirements.

Following an account deletion request, we will delete the user’s account and associated data, unless retention is necessary for legal or regulatory requirements, safety and security measures, and fraud prevention, or if there are outstanding credits, unresolved claims, or disputes related to your account. Data is generally deleted within three (3) working days of a deletion request, except where retention is necessary for the aforementioned circumstances.

11. Changes to the Privacy Policy

We reserve the right to amend this Privacy Policy from time to time. Any information we collect is subject to the Privacy Policy in effect at the time of its use. In the event of major changes to our data collection or usage practices, we will notify you by posting an announcement on the website or by sending you an email.