



# **PRIVACY POLICY STATEMENT**

November 2019

Asante Financial Services Group November 2019



# **Document Review and Approval**

This document was prepared by

Version	Author	Date	Sign Off	
1.0	Michael Munga	28/11/2019	D	
			0	

This document has been reviewed and approved by

No	Reviewer	Sign Off	Date
			reviewed
1	George Maingi		3/12/2019
2	James Muritu	A Vru	3/12/2019
3	Joy Mutinda		03/12/2019
4	Catherine Wangui	Ret -	3/12/2019
5	Chidi Okpala	2	03/12/19



## ASANTE FINANCIAL SERVICES GROUP PRIVACY POLICY STATEMENT

Asante Financial Services Group respects customer and client privacy and is committed to protecting the confidentiality of all personal information entrusted to it.

This statement explains policies, practices, and security measures that Asante Financial Services Group has in place to safeguard customer personal and confidential information. It covers any products or services customers have with Asante Financial Services Group, including loans.

This privacy policy discloses some or all the ways Asante Financial Services Group gathers, uses, discloses, and manages a customer or client's data. It is in line with the legal requirement and global best practices to protect our customer or client's privacy. It should be read alongside the relevant product terms and conditions provided under each customer agreement, as these also include sections relating to the use and disclosure of information.

#### **COLLECTION OF INFORMATION**

Asante Financial Services Group provides financial products and services through its online systems. Generally, when one visits the Asante Financial Services Group's website, they are not required to provide any personal information, the organization also does not collect any unique identifying information about customers browsing our website unless one voluntarily and knowingly provides that information, when one sends us an email or completes an application online. If customers provide this information, it is only used internally and in furtherance of the purpose for which it was provided.

There are instances where the Asante Financial Services Group must have a customer or client's personal information to grant access to protected and secured sites. This information may include registration data (name, email address, phone number) when registering for online or mobile based financial services provided by Asante Financial Services Group.

Personal information is also collected during client onboarding in compliance with Know Your Customer (KYC) regulations and when carrying out financial transactions.

Generally, the Asante Financial Services Group collects the following information

- Individual personal information (e.g. name, age, and place of birth).
- Individual personal contact details (e.g. physical address, email address, mobile numbers).
- Identity information (e.g. photo ID, passport, utility bill, national ID card and nationality).
- User authentication login (e.g. login credentials for online apps).
- Financial information about the ways you interact with Asante Financial Services Group (e.g. channels used, payment history from and to your account, transaction information, geographic information, and information concerning your complaints).
- Other relevant financial information as deemed fit for the purpose of offering an enriched proposition to the client or customer
- Information captured in customer documentation or data exchange such as application forms or advice documents or via telephone.
- Cookies and similar technologies used to remember your preferences and tailor content.

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- Risk rating information (e.g. credit risk rating and transactional behavior).
- Data or records of correspondence related to relevant exchanges of information (e.g. emails).
- Information from third parties providing information to identify and manage fraud.
- Closed circuit television (CCTV) in and around Asante Financial Services Group facilities (these may collect photos or videos of you).
- Voice recorded for quality and security purposes through voice call enquiries made at Asante Financial Services Group Call Center.
- Other information about you that is voluntarily provided by filling in forms, participating in marketing research, surveys, customer forums or by communicating with us, whether face-to-face or via other available channels (e.g. by phone, email, online).

#### **USE OF INFORMATION**

Asante Financial Services Group collects only the personal information necessary to fulfill customer requests and to provide the requested and/or agreed services. Personal information is not used for purposes other than those listed in this document, unless permission is obtained, otherwise required by law.

#### Information collected is used to:

- Verify customer identity (e.g. for authentication or for anti-money laundering procedures).
- Provide services and delivery products (including via online platforms).
- For communication purposes with our customers
- Deal with your transactions or carry out instructions.
- Perform data analytics and understand your preferences and how you use the provided services.
- Keep a record of correspondence (e.g. to check instructions given or to enhance service quality).
- Meet compliance and legal obligations such as to comply with CBK regulatory framework.
- Manage our relationship with customers (including any marketing activities you agree to).
- Collect any money owed to Asante Financial Services Group.
- Perform credit checks and obtain or provide credit references.
- For internal operational support and administrative purposes (e.g. product development, audit, credit and risk management).
- Complete surveys that we use for research purposes, although you do not have to respond to them.
- Ensure security and business continuity.
- For service quality management and product improvement.
- Correspond with third parties (e.g. CRB's, payment service providers, debt collectors).
- Carry out investigations (e.g. due diligence checks, sanctions and anti-money laundering checks).



## Automated Decisions and Profiling

To ensure decisions are quick, fair, efficient, and correct, based on information held; Asante Financial Services Group may use systems to make automated suggestions and decisions that can affect the products, services or features offered to customers. The types of automated decisions include:

- Tailored Products and Services: Asante Financial Services Group may group customers with similar customer segments to study and learn about their needs, design products and services and to make decisions based on what we learn.
- Credit risk rating and detecting fraud: Personal, financial and transactional information may be used for risk and credit rating purposes.

# DISCLOSURE AND SHARE OF USER INFORMATION

Asante Financial Services Group does not disclose any Customer Information about current customers, former customers, or website visitors to anyone, except as permitted or required by law. We also do not sell any of our customer's personal information.

Personal information can however be shared with affiliated third parties such as;

- Service Providers acting on Asante Financial Services Group's behalf to provide financial services.
   Asante Financial Services Group will only transfer personal information to them when they meet privacy and security standards for processing of data. We only share personal information that allows them to provide their services.
- Courts, law enforcement and regulatory bodies in order to respond to requests of courts, government
  or law enforcement entities or where it is necessary to comply with applicable laws, court orders or
  rules, or government regulations.
- Payment recipients, beneficiaries, intermediaries, nominees, clearing houses, fraud prevention agencies, debt recovery agencies, guarantee providers, other financial institutions, lenders and tax authorities, credit reference agencies, payment service providers,
- We may also share aggregated or anonymized information with partners such as research groups or universities.

#### STORAGE AND RETENTION OF INFORMATION

The Asante Financial Services Group will take all necessary steps to ensure that customer data is treated securely and in accordance with this privacy policy statement. Security standards and procedures are maintained to prevent unauthorized access/loss, misuse, alteration, or destruction of data. Asante Financial Services Group uses technologies (e.g. data encryption, firewalls) to protect the security of customers. All staff members and third parties are required to observe this privacy standards and to allow Asante Financial Services Group to audit them for compliance.

In the event that one ceases to be a customer of Asante Financial Services Group, according to the organization's data retention practices, and in compliance with CBK regulations, Asante Financial Services Group shall retain the data for a period of up to Seven (7) years.

After expiration of the period, Asante Financial Services Group may anonymize the data or aggregate it for analytical purposes. The customers have the right to request all or part of their data erased from

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Asante Financial Services Group system. They also have the right to request that their personal information be corrected or updated in case of changes.

#### **PRIVACY POLICY UPDATES**

Please note that, Asante Financial Services Group Ltd may review and update this Privacy Policy from time to time as needed with or without notice. Therefore, you should review the terms of this policy periodically to make sure that you are aware of how Asante Financial Services Group collects and uses personal information. By using our financial products, you consent to the collection and use of your personal information by Asante Financial Services Group.