

M-KOPA Customer Privacy Policy

Please read this carefully as this policy is legally binding when you purchase our products and use our service.

At M-KOPA we take the privacy of our customers and their data very seriously. M-KOPA's business model is premised on 'upgrading the lives' of our customers and we seek to ensure that our customers' personal and device data is kept secure and used legally and in a transparent and fair manner.

This Privacy Policy (the "**Policy**") is a key step along that journey.

The Policy explains:

- How we collect, use, store, transfer and share your personal information (hereinafter referred to as "**Processing**" in relation to personal and device information).
- How we process information related to your devices, (hereinafter referred to as "**device information**").
- Why we process your personal and device information.
- What we need from you in relation to your personal information.
- Your rights in relation to the processing of your personal information.

This Policy is available on our website at www.m-kopa.com and it applies to all M-KOPA group companies including, but not limited to, M-KOPA Kenya Limited, M-KOPA Uganda Limited and M-KOPA Solar Tanzania Limited.



M-KOPA DOES NOT SELL THE PERSONAL OR DEVICE INFORMATION OF ITS CUSTOMERS TO ANY THIRD PARTIES.



1. WHEN DOES M-KOPA COLLECT PERSONAL AND DEVICE INFORMATION?

We collect your personal and device information when you:

- Sign up to purchase our products and services and fill out our customer registration form.
- Possess or use our devices.
- Make payments to us.
- Apply to us for employment.
- Call or otherwise contact us including via SMS, USSD or an in-store visit to report a problem or discuss an issue.
- Participate in market studies, surveys or promotions.
- Participate in discussions on our social media platforms.



2. WHY DOES M-KOPA PROCESS PERSONAL AND DEVICE INFORMATION?

We process your personal and device information to gather data which is necessary for the performance of the contract which you will enter into with us. We may also process your personal and device information from time to time to enable us improve the quality of the goods and services that we offer and to offer you additional goods and services.

In addition, M-KOPA is required to undertake know-your-customer and due diligence measures so as to verify the identity of all customers that M-KOPA interacts with. Therefore, the processing of your personal and device information by M-KOPA so as to comply with anti-money laundering legislation is mandatory.



3. WHAT PERSONAL INFORMATION AND DEVICE INFORMATION DOES M-KOPA PROCESS?

We process the following information about you:

a) Information you give us when we enter into a contract:

- When you purchase our products or services you provide us with your personal details in our customer agreement. These include your name, email address, occupation, birth date, gender, mobile number, national identity number (or other similar identification numbers as applicable), geographical location, photograph, and physical address.
- When you purchase our product, we may also need additional financial information from you such as your daily income/purchase potential or any information needed to comply with the terms and conditions of our contract with you, for the particular service.

The collection of the above information is mandatory. The failure to freely consent and provide any of the above-listed information would prevent us from entering into an agreement with you and would prohibit us from providing any products or services to you.

b) Information we collect about you from the continued use of our products and services:

- We process the payments you make to us and your account information when using our services.
- We process your overall account balance and payment history.
- We process your information when you call or otherwise contact us via SMS or USSD, to either report a problem or discuss an issue.
- We process your location when analyzing your device performance, and during repairs and replacement of the products and services, and while investigating fraud.

The collection of the above information is mandatory. The failure to freely consent and provide any of the above-listed information would prevent us from entering into an agreement with you and would prohibit us from providing any products and services to you.

c) Information from our website:

If you visit our website we may collect information about you to distinguish you from other users and to improve your experience. Please review the cookies policy on our website.

d) Information from third parties:

- We process information about you that we receive from third parties including Credit Reference Bureaus, Mobile Network Providers, Data and Analytics Firms, Business Process Outsourcing Firms and Financial Institutions.

We process the following information about your devices:

e) Information obtained from analytic tools in our products:

- We process information related to your devices including temperature settings, battery life, SIM communications and performance, and customer usage.
- We may process information from your M-KOPA Televisions including viewing history, channel availability and signal strength.



4. HOW DOES M-KOPA PROCESS MY PERSONAL INFORMATION AND DEVICE INFORMATION?

We process your personal information for the following purposes:

- To carry out our obligations relating to your contract including communicating with you, providing you with our products and services under our contract and related information.
- To develop your credit profile and determine your eligibility for additional products and services that we may offer from time to time.
- To communicate with you about any delinquencies in payments.
- To investigate cases of fraud or illegal activity.
- To improve, test, and monitor the effectiveness of our products and services.
- To develop and test new features and notify you about changes to our services.
- To improve the safety and security of our services.
- To comply with any applicable legal and/or regulatory requirements.

We may also combine the information we receive from third party sources with the information you give to us and the information we collect about you. We may use this information and the combined information for the purposes set out above (depending on the types of information we receive).

We process information about your devices for the following purposes:

- To develop your credit profile.
- To activate or de-activate your device depending on its credit status.
- To monitor and investigate whether your device is being used in accordance with our terms and conditions found on our website and in the relevant product manual.
- To investigate cases of fraud or illegal activity.
- To monitor device performance including battery performance and charging information for the purposes of troubleshooting, data analysis, testing, research, statistical and survey purposes.
- To determine use location information to tailor our services according to the needs of a specific location.



5. DOES M-KOPA SHARE MY INFORMATION WITH THIRD PARTIES?

We may share your information with selected third parties including:

- Business processing outsourcing firms including those handling customer care, customer communications and payment collections.
- Credit reference bureaus and other similar third parties offering credit scoring information, including reporting your credit histories with such parties.
- IT service providers including software developers, platform providers or cloud providers.
- Data processing, analytics firms or search engines to help us analyse our customer data.
- Academic or research institutions.
- Other business partners, suppliers and sub-contractors for the performance and execution of any contract we enter into with them or you.
- Advertisers and advertising networks to market products and services to you.
- Other affiliated entities within the M-KOPA group of companies.
- Any person or entity who invests in or finances (or may potentially invest in or finance), directly or indirectly, M-KOPA, and any of such person's affiliates, officers, directors, employees, professional advisers, auditors, insurers or insurance brokers, service providers, partners and any delegate, agent, manager, administrator, nominee, attorney, trustee or custodian of any such person.
- When required by law, regulation, court order or other court proceedings.



M-KOPA DOES NOT SELL THE PERSONAL INFORMATION OF ITS CUSTOMERS TO ANY THIRD PARTIES.



6. WHAT HAPPENS TO MY PERSONAL INFORMATION IF THERE WAS A CHANGE OF CONTROL?

If we sell or otherwise transfer part or the whole of M-KOPA or our assets to another organization (in the course of a transaction like a merger, acquisition, bankruptcy, dissolution, liquidation), your information may be among the items sold or transferred. The buyer or transferee will have to honor the commitments we have made in this Policy.



7. HOW DO WE STORE AND TRANSFER YOUR PERSONAL INFORMATION AND DEVICE INFORMATION?

- The personal information and device information that is collected through the provision of our services may be stored and processed in any country in

which M-KOPA, its affiliates or service providers maintain facilities, subject to the requirements of any applicable laws.

- By using the services and as part of our customer agreement, you consent to the transfer, storing or processing of your personal information and device information to any country in which M-KOPA, its affiliates or service providers maintain facilities. In these cases, we ensure that both ourselves and our service providers take adequate and appropriate technical, physical and organizational security measures to protect your personal information and device information and the use and disclosure of your personal information and device information as described in this policy.
- We use appropriate, reasonable safeguards to help keep your personal information and device information secure. We also take reasonable steps to verify your identity before granting you access to the service. As you will know, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data during transmission, and any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorized access.



8. HOW LONG DO WE KEEP YOUR PERSONAL AND DEVICE INFORMATION?

We store your personal information and device information for the duration of your repayment period. This period can be found on your customer agreement. Once your device has been re-paid or upon the termination or deactivation of your account, M-KOPA, its affiliates, or its service providers may retain your personal and device information for as long as is required under applicable law in order to determine your eligibility for additional products or services, to perform analytics and help improve future product offerings and services or otherwise for backup, archival, and/or audit purposes.



9. PROFILING AND AUTOMATED DECISION MAKING

As part of being a highly technical and innovative company, we may use Automated Decision Making (ADM) in order to improve your experience or to help fight financial crime. For example, so that we can provide you with fast and efficient services, we may use ADM to verify your identity documents or to confirm the accuracy of the information you have provided to us. None of our ADM processes have a legal effect on you.



10. YOUR RIGHTS

Subject to applicable data privacy laws:

- You have the right to correct any personal information we hold on you that is inaccurate, incorrect, or out of date.

- You have the right to request that we stop processing your personal information if this processing causes or is likely to cause unwarranted substantial damage or distress.
- You have the right to request that we stop processing your personal information for direct marketing purposes.
- You may have the right to confirm which of your personal information we possess and to request the identity of any third parties who have access to this information.
- You have the right to request that any decision which significantly affects you is not based solely on automated decision making.



11. HOW TO CONTACT US

If you have any questions about this privacy policy or our products and services, please send us an e-mail to dataprivacy@m-kopa.com



12. CHANGES TO OUR PRIVACY POLICY

M-KOPA may modify or update this policy from time to time, so please review it periodically. We may provide you additional forms of notice of modifications or updates as appropriate under the circumstances. Your continued use of our products and services after any modification to this policy will constitute your acceptance of such modification.