



JAMII TELECOMMUNICATIONS LIMITED ("JTL")

PRIVACY POLICY

This policy covers how we, Jamii Telecommunications Limited Ltd., also known as 'JTL', collect, use, disclose, transfer and store your data.

Our promise to you:

- Is to hold your data securely;
- Share only where you agree;
- Use your data to improve our services;
- Put you in control by allowing you to update, delete and access your data.

Our website www.faiiba4g.co.ke is the official website for our company. Please read the following information carefully. If you register for our services on behalf of others, you are responsible for ensuring that the others are aware of the content of this Privacy Policy and are in agreement with you supplying their personal data to use to apply for services from us. By making an application, you agree to the transfer, storage and processing of the information as necessary. We will take all reasonable steps necessary to ensure your data is treated securely and in accordance with this Privacy Policy but if you do not agree with this policy we cannot accept your application.

The personal information we collect and when and why we use it

The information we collect about you depends on the JTL products and services you use and subscribe to. It includes (but isn't limited to) the following:

- Your name, address, email address, physical and postal address, telephone number, date of birth, national identity card number, gender. We also collect information on how you use our products and services (such as the type, date, time, location and duration of calls or messages, the numbers you call and how much you spend, and information on your browsing activity), the location of your mobile phone from time to time, details of your faiba money transactions and any other information collected in relation to your use of our products and services. In addition, we are also required under the Kenya Information and Communications (Registration of Sim-Cards)



Regulations, 2015 to view original copies of various identification documents and collect copies for registration purposes.

- Your preferences for particular products, services or lifestyle activities when you tell us what they are – or when we assume what they are, depending on how you use our products and services.
- Your contact with us – such as a note or recording of a call you make to one of our contact centres, an email or letter you send to us or other records of any contact you have with us.
- Your account information – such as dates of payment owed and received, TopUp information, the subscription services you use or any other information related to your account.

How we use this personal information

We use your personal information for a number of purposes connected with our business operations and functions, which include:

- processing your orders or applications;
- carrying out credit checking and scoring (unless we have agreed otherwise);
- providing you with products and/or services requested (including the presentation or elimination of calling or connected line identification) or administering your account;
- billing you (unless you pay by another agreed method);
- dealing with requests, enquiries or complaints and other customer care related activities; and all other general administrative and business purposes;
- carrying out market and product analysis and marketing our products and services generally and design financial services or related products for customers' use;
- contacting you (including by post, email, fax, short text message (SMS) or telephone) about our products and services and the products.
- registering your details and allocating or offering you rewards, discounts or other benefits and fulfilling any requests or requirements you may have in respect of our loyalty or reward programmes and other similar schemes;
- carrying out any activity in connection with a legal, governmental or regulatory requirement on us or in connection with legal proceedings, crime or fraud prevention, detection or prosecution;



We do not generally collect special categories of personal information from you.

Personal information we collect and use for legal, compliance and regulatory purposes

We process your personal information so that we can meet our legal, compliance and regulatory obligations, for legal purposes, such as to respond to a valid legal claim, summons or regulatory order, and to protect our property, rights and interests as well as the property, rights and interest of other persons.

Personal information we collect and use from third parties

We collect personal information from third parties who you have authorised to provide your personal information to us (for example, banks, government agencies). These third parties have agreed to confidentiality obligations and use any personal information we share with them or which they collect on our behalf solely for the purposes of providing the contracted service to us. These third parties include; bank and payment providers to authorise and complete payments; with governments, government organisations and agencies, regulators, law enforcement and others as permitted or required by law.

We also collect personal information from individuals who may refer you as a friend to our products or services. We ask these individuals to confirm that you are happy to hear from us.

Personal information we collect and use when you are making a payment

We collect different personal information depending on your payment method (such as credit card, bank transfer, cash). For example, for credit card payments we may collect the credit card holder name, address, card number, expiry date and CVC code.

Legal basis for using your personal information

We will only collect, process use, share and store your personal information where we are satisfied that we have an appropriate legal basis to do this. This may be because:



- we need to use your personal information to perform a contract or take steps to enter into a contract with you. For example, to take payment for your application;
- we need to use your personal information for our legitimate interest as a commercial organisation. For example, we may capture your interactions with our website via tools on our website in order to identify errors or issues and ensure your customer experience meets expectations. In all such cases, we will look after your information at all times in a way that is proportionate and that respects your privacy rights;
- we need to use your personal information to comply with a relevant legal or regulatory obligation that we have.

Sharing your personal information with others

We share your personal information in the manner and for the purposes described below:

- to improve the products and services we offer or help us to create new ones and for marketing and analytics as detailed below; and for the purposes described in this Privacy Policy;
- bank and payment providers to authorise and complete payments;
- with governments, government organisations and agencies, regulators, law enforcement and others as permitted or required by law, and to generally comply with all applicable laws, regulations and rules, and requests of law enforcement, regulatory and other governmental agencies;

Personal information we collect and use for marketing purposes and analytics

How we use personal information to keep you up to date with our products and services.

We will only send you direct marketing in accordance with your marketing preferences. We may contact you by email, social media, or through other communication channels that we think you may find helpful. If at any time you would like us to stop sending you marketing material, please contact us or choose the relevant "unsubscribe" option set out.



How you can manage your marketing preferences

To protect your privacy and to ensure you have control over how we manage marketing with you and provided that you have indicated that you would like to receive it:

- we will take steps to limit direct marketing to a reasonable level;
- only send you communications which we believe may be of interest or relevance to you and at all times in line with your permissions, which, as appropriate, may include telling you about developments in the products and services;
- you can click the "unsubscribe" link that you will find at the bottom of our mailers which you receive from us, or you can unsubscribe by contacting us.

If you do unsubscribe from marketing communications, you will still receive operational and service messages from us regarding your services and responses to your enquiries made to us.

When and how we undertake analytics

We may use cookies and other interactive techniques such as web beacons to collect non-personal information about how you interact with our website, and web-related products and services, to:

- understand what you like and use about our website;
- understand what you do not like and do not use on our website;
- provide a more enjoyable, customised service and experience, and
- help us develop and deliver better products and services tailored to our customers' interests and needs.

We may use a persistent cookie to record details such as a unique user identity and general registration details on your PC. This helps us recognise you on subsequent visits to this website so that you don't have to re-enter your registration details each time you visit us and allows us to carry out the activities mentioned above. Most browser technology (such as Internet Explorer, Firefox, chrome etc) allows you to



choose whether to accept cookies or not – you can either refuse all cookies or you can set your browser to alert you each time that a website tries to set a cookie.

How we protect and store your personal information

Protection of your personal information

We have implemented and maintain appropriate technical and organisational security measures, policies and procedures designed to protect the personal information that you share with us and safeguard the privacy of such information. For example, the measures we take include placing confidentiality requirements on our staff members and other third parties.

Storage of your personal information

We keep your personal information for as long as is reasonably necessary for the purposes for which it was collected. We will ensure that it is disposed of in a secure manner. In most cases we will destroy your data 6 years after collection in order to comply with legislation.

In some circumstances we may store your personal information for longer periods of time, for example, where we are required to do so in accordance with legal, regulatory, tax, or accounting requirements. In specific circumstances we may store your personal information for longer periods of time so that we have an accurate record of your dealings with us in the event of any complaints or if we reasonably believe there is a prospect of litigation relating to your personal information or dealings.

Legal rights available to help manage your privacy

You have certain rights in relation to your personal information.

In order to exercise your rights, we may ask you for additional information to confirm your identity and for security purposes, in particular before disclosing personal information to you.

You can exercise your rights by emailing us at customercare@jtl.co.ke or by sending us a communication to Jamii Telecommunications Limited Ltd., P.O. Box 47419-



00100. Subject to legal and other permissible considerations, we will make every reasonable effort to honour your request within 30 days or inform you if we require further information in order to fulfil your request.

We may not always be able to fully address your request, for example, if it would impact the duty of confidentiality we owe to others, or if we are legally entitled to deal with the request in a different way.

Right to access personal information

You have a right to request that we provide you with a copy of your personal information that we hold and you have the right to be informed of:

- the source of your personal information;
- the purposes, legal basis and methods of processing;

Right to rectify or erase personal information

You have a right to request that we rectify inaccurate personal information. We may seek to verify the accuracy of the personal information before rectifying it.

You can also request that we erase your personal information in limited circumstances where:

- it is no longer needed for the purposes for which it was collected; or
- you have withdrawn your consent (where the data processing was based on consent); or
- following a successful right to object; or
- it has been processed unlawfully; or
- the personal information must be erased for compliance with a legal obligation to which they are subject.

We are not required to comply with your request to erase personal information if the processing of your personal information is necessary:

- for compliance with a legal obligation; or
- for the establishment, exercise or defence of legal claims.



Right to object to the processing (including direct marketing) of your personal information

You can object to any processing of your personal information which has our legitimate interests as its legal basis, if you believe your fundamental rights and freedoms outweigh our legitimate interests.

You can request that we stop contacting you for marketing purposes.

You can request that we not transfer your personal information to unaffiliated third parties for the purposes of direct marketing or any other purposes.

If you have joined our mailing list, you can manage your marketing preferences automatically by clicking the "unsubscribe" link that you will find at the bottom of our emails which you receive from us, or you can unsubscribe by contacting us at customercare@jtl.co.ke

Right to restrict the processing of your personal information

You can ask us to restrict your personal information, but only where:

- its accuracy is contested, to allow us to verify its accuracy; or
- the processing is unlawful, but you do not want it erased; or
- it is no longer needed for the purposes for which it was collected, but we still need it to establish, exercise or defend legal claims; or
- you have exercised the right to object, and verification of overriding grounds is pending.

We can continue to use your personal information following a request for restriction, where:

- we have your consent; or
- to establish, exercise or defend legal claims; or
- to protect the rights of another natural or legal person.

We cannot protect any information that you make available to the general public – for example, on message boards or in chat rooms. Please note that when you are



accessing a non-JTL website, you should always read their privacy policy or website terms and conditions – especially if you are considering providing them with your personal information. You are also responsible for maintaining the secrecy of your passwords and/or any account information.

We can't accept responsibility for any unauthorised access or loss of personal information that's beyond our control. You play an important role in protecting against online fraud. You should be careful that your account details including your User ID(s) and/or Passwords/personal identification numbers (PIN) are not compromised by ensuring that you do not knowingly or accidentally share, provide or facilitate unauthorised use of it. Please do not share your User ID and/or password or allow access or use of it by others. We endeavor to put in place high standards of security to protect your interests. You should safeguard your unique User ID(s) and Passwords/PINs by keeping it secret and confidential. Kindly never write them down or share these details with anyone. JTL will never ask you for your Passwords/PINs, in order to ensure that you are the only person who knows this information. When choosing your unique User ID and Password for the first time, do not create it using easily identifiable information such as your birthday, telephone number or a recognisable part of your name. If you think your User ID and/or Passwords/PINs have been disclosed to third party is lost or stolen and unauthorised transactions may have been conducted, you are responsible to inform us immediately.

If you have any concerns regarding data that we hold, please contact our contact centre on customercare@jtl.co.ke

Changes to our Privacy Policy

We may change this Privacy Policy from time to time. **IMPORTANT:** By accessing this web site and any of its pages you are agreeing to the terms set out above.