

1.1 Introduction

This privacy policy explains how we collect, use, disclose and safeguard your information when using our platforms. Instacash respects your privacy and is committed to protecting it through our compliance with this Privacy Policy. This policy describes the types of information we may collect from you or that you may provide when you use our mobile application, our USSD channel and our practices for collecting, using, maintaining, protecting, and disclosing that information.

1.2 Regulation of data privacy and protection

As a client of Instacash, your primary data controller will be DIRECTORE TECHNOLOGIES trading as INSTACASH. We conform to the Data Protection Act, 2022.

1.3 The purpose and scope of this statement

The purpose of this statement is to inform you about how we collect, use, store, make available, disclose, update, safeguard, destroy or otherwise deal with (process) your personal information and to explain your rights relating to the privacy of your personal information and how the law protects you.

We will only transfer personal information to countries that we are satisfied will provide adequate data protection.

Protecting the privacy, confidentiality and security of your personal information is very important to us as it is critical for us to maintain your trust and act in the right way to meet your needs. We have therefore implemented internal policies and procedures to ensure that your personal information is protected.

1.4 The types of personal information we collect

Personal information is any information from which you can be identified. The personal information we may collect about you includes but is not restricted to:

- Name, age, gender, sex, and identifying numbers.
- Physical and email addresses and contact numbers.
- Online identifiers and your online behavior such as cookies and IP addresses.
- Engagements with us including use of products or services, transactions, requests,
- Queries and complaints.

1.5 Collection of personal information

We will collect personal information directly from you or by telephone or through online

channels such as our website, mobile applications or electronic messaging platforms.

We also collect personal information about you from other sources where lawful and reasonable, such as reputable third parties (where you have consented for your PI to be shared for either the express purpose or for any further processing) that you deal with or that the Instacash group interacts with for the purpose of conducting its business. These third parties include:

- Business partners (including partners and participating partners involved in reward programs, campaigns or other business activity, joint-venture partners, social media, and platform partners) or companies that we may acquire or that merge with us. If you are a third-party service provider, we may collect personal information about you as a data subject to ensure that the business relationship and matters relating to the agreement between you and us can be fulfilled. You warrant that, if you provide us with any personal information about other persons, such as employees, shareholders or your directors, you are authorized to share their personal information with us for purposes set out in this statement.

Providing your personal information to us is voluntary. However, it is mandatory under certain circumstances, for example when you apply for products and/or services or to comply with anti-money laundering legislation or to fulfil a legal/regulatory obligation. If you fail to provide us with your personal information when requested, we may not be able to provide the products or services to you or comply with our legal obligations.

Whenever you provide us with the personal information of third parties, you must inform them that you need to disclose their personal information to us. We will process the information in accordance with this statement.

1.6 Reasons for processing personal information

Our responsibilities to you are very important to us and we aim to provide you with personalized services to meet your needs. We may process your personal information for any of the reasons outlined in the rest of this section 1.5.

1.6.1 Contract requirements

We may need to process your personal information if we require it to conclude or perform under a contract or agreement with you for a product or service that you have applied for either with us or through our business partners with whom we have entered a partnership, collaboration, or alliance arrangement or for purposes of:

- Providing services to you that involve opening and maintaining your account, executing transactions as well as managing our risks and maintaining our overall relationship with you.
- Communicating with you regarding the services you have with us; or

- Providing you with further information that you request from us regarding the services you have with us.

1.6.2 Lawful obligations

We may need to process your personal information for the following purposes:

- To complete integrity and business conduct checks required for compliance purposes including due diligence and onboarding processes, monitoring and assurance reviews and conduct sanctions screening against any sanctions lists.
- To comply with other risk management, regulatory and legislative requirements.
- To comply with voluntary and mandatory codes of conduct.
- To detect, prevent and report theft, money laundering, terrorist financing, corruption or other potentially illegal activity, or activity that could lead to loss.
- To process and settle transactions and payments.

1.6.3 Legitimate Interest

Instacash may process your personal information in the regular management of its business and to protect the interests of the Group and its clients, shareholders, employees and other third parties, including our business partners and members of the public.

Instacash may process your personal information to:

- Maintain, monitor, improve and develop our business policies, systems and controls.
- Maintain and improve data quality.
- Design, develop and test services and solutions for clients, which may include combining sources and types of your personal information.
- Personalize and customize services and solutions, messaging and advertising;
- Respond to client enquiries and communications and to record these interactions for the purpose of analysis and improvement.
- Achieve other related purposes.

1.6.4 Consent

In addition to the reasons given above, we may process your personal information where we have your specific consent for a defined purpose. We will also seek your consent as promulgated by the Data Protection Act 2022.

We will store your personal information according to our defined retention schedules as provided by the law and thereafter delete it.

1.7 Processing personal information

Due to the integrated nature of business and to provide you with efficient access to our services, we may process your personal information in the kingdom of eSwatini and or where our third-party service providers operate. We will only transfer personal information to countries that we are satisfied will provide adequate data protection, and we ensure our third party service providers comply with the minimum data protection standards of Instacash.

1.8 The duration of retaining personal information

We retain your personal information in line with our legal and regulatory obligations and for our business and operational purposes as highlighted above. This will generally be for at least 7 years of legal retention periods for Eswatini post account deletion in terms of the AML Act.

1.9 Communicating

Besides in-person communication, we use a wide array of channels to engage with you regarding your existing products and services and to keep you updated. These include SMSes, email, phone calls, notifications sent to your mobile device and inapp notifications. We need to keep you up to date on an ongoing operational basis about your existing services and their new features especially where we are making them more secure and as we make our services more convenient for you.

We may contact you through these means for research purposes or to communicate with you for marketing of new products or services as explained in greater detail below.

1.10 Use of personal information

If you are an existing client with whom we have had previous interactions in respect of your account, you are important to us and therefore we would like to share information about our services, and special offers with you (subject to applicable local laws).

If you no longer wish to be contacted for marketing purposes, you may opt out at any time as per the instructions contained in any marketing communication you receive. You can also opt out by contacting us through any of the channels available on our website at www.instacash.co.sz

You also have the right at any time to stop us from contacting you by any means for marketing purposes.

1.11 Sharing personal information

We share information with vendors, auditors, service providers and agents supporting our services to you, with our trusted partners to introduce services to you, we take extra care when we transfer or share information and will enter into suitable contracts with the trusted parties with whom we share your information, thus ensuring your rights under relevant data protection legislation are upheld.

1.12 Protecting personal information

The security of your personal information is important to us, and we will take reasonable steps to keep your personal information safe and to prevent loss, destruction of and damage or unlawful access to your personal information by unauthorized parties. We require the same level of security to be implemented by our service providers and other third parties.

However, you must not share or send us any personal information through unauthorized channels, as these are not a secure way of communication and carry a risk of interception and unauthorized access. You should only share personal information through our authorized channels.

1.13 Rights

We value your trust and want you to be familiar with your rights under the legislation and to know how you can exercise them in your interactions with us. You have the right to:

- Access the personal information we hold about you and to correct and update your information.
- Object to our processing your personal information, where applicable.
- Request that we delete your personal information where appropriate.
- Be notified that your personal information is being collected by us or has been accessed or acquired by an unauthorized person.
- Object to the processing of personal information for the purposes of direct marketing.

not be subject to automated decision-making processes in respect of an application for products and/or services, except under certain circumstances and

- To request reasons or make a representation to us if your application for services is refused.

1.14 The use of cookies on our website

A “cookie” is a small text file that is stored on your computer, smartphone, tablet, or other device when you visit a website or use an application. It helps to distinguish you from other users and contains specific information related to your use of our website or application, such as your login details and your preference settings, and helps the website or the application to recognize your device.

Cookies help to make a website or app function better and make it easier for us to give you a better user experience on our online channels. To use or store cookie types that are not required for the functioning of the website or app and are optional, we will obtain your consent first.

For this reason, we limit our use of cookies to:

- Providing services that you request;
- Delivering advertising through marketing communications;
- Providing you with a better online experience and tracking website performance; and helping us make our website more relevant to you.

We use the following types of cookies on our online channels, such as our website.

1. Strictly necessary cookies

These cookies are mandatory and are required for the effective operation and functioning of our website on your device. They enable you to use the website and the features on the website and cannot be switched off.

2. Performance cookies

These are optional cookies that collect information about how you use the website but not any personal information. Performance information is anonymous and mostly statistical and is used to improve the performance of our website.

3. Marketing cookies or advertising cookies

These cookies are also optional and are used to deliver and display advertisements that are relevant and engaging for you as the user. They help us measure how effective our advertising campaigns are by your interaction with the advertisement.

4. Session cookies

These cookies are temporary and optional and only exist while you browse our website to remember your activities on the website. As soon as you close the website or move to a different website, the cookies are deleted.

5. Persistent cookies

These are permanent, optional cookies that are stored on your device until they reach a set expiry date or until you delete them. They remember your preferences or actions on our website (or in some cases across different websites). We may use them for various reasons, for example to remember your preferences and choices when you use our website, or to display relevant advertising campaigns to you.

6. First-party cookies

These are cookies that we create and store when you use our website and relate to information obtained directly from you.

7. Third-party cookies

These cookies are owned and created by a third party that provides a service to us such as social media sharing, website analytics or content marketing. These cookies are intended to collect information directly from you by us and we share the personal information with the third party through the cookies that the third-party stores on our website.

Once you select your cookie preferences you can always change them later by enabling or disabling them. Where we use cookies to collect personal information, it will always be done in accordance with this statement. You can stop your browser from accepting cookies, but if you do, some parts of our websites or online services may not work properly. We recommend that you allow cookies. Explore the settings and options on your browser to disable or enable them or visit <https://www.aboutcookies.org> for detailed information about managing cookies.

1.15 Social Media

When you engage with us through our social media accounts, your personal information may be processed by the social media platform owner. This process is outside our control and the processing activities may be in a country outside of Eswatini that may have different data protection laws. For more information about the privacy practices of a social media platform, please refer to and read the terms and conditions of that social media platform before you use it or share any personal information on it.

Our social media accounts are not appropriate forums to discuss our clients' products or financial arrangements. We will never ask you to share personal, account or security information on social media platforms. We may, however, ask you to message us in private through one of our official social media accounts.

1.16 General

We may change this statement from time to time in accordance with changes in our services or regulatory requirements. We will make reasonable efforts to notify you through suitable communication channels.

Should you have any queries relating to the processing of your personal information by Instacash, please contact our Data Protection Officer at:

Physical Address: 2ndFloor, Development house, Swazi Plaza, Suite 202

Email: dataprotection@instacash.co.sz