# PRIVACY POLICY NOTICE

## PRIVACY POLICY NOTICE

**LOOP** (including its direct and indirect affiliates, subsidiaries, assigns) respects your privacy and is committed to protecting your personal data. This Privacy Policy (and any other documents referred to in it) sets out the basis on which any personal data we collect from you, that you provide to us, or that is otherwise made available to us will be processed by us.

This Privacy Policy will inform you as to how we look after your personal data when you hold an account with us, use our products or services, or visit our website (regardless of where you visit it from) and tells you about your privacy rights and how the law protects you. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

This Privacy Policy may be amended or updated from time to time to reflect changes in our practices with respect to the processing of personal data, or changes in applicable law. It is important that you read this Privacy Policy together with our terms and conditions, and any other policies and notices we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This Privacy Policy supplements other notices and related policies and is not intended to override them.

## DEFINITIONS AND INTERPRETATION

a) For the purposes of this Privacy Policy, the following definitions apply:

i. **"Applicable Law"** means the Constitution of the Republic of Kenya, all Acts of Parliament including regulations, rules, guidelines, guidance notes issued pursuant to any Act of Parliament, legislative and regulatory requirements, and codes of practice applicable to the processing of personal data and/or applicable to a data controller or data processor as may be amended from time to time;

ii. **"Personal Data"** means any information relating to an identified or identifiable natural person (hereinafter **"Data Subject"**). For clarity, an identifiable person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier, or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural, or social identity of such a natural person;

iii. **"Controller"** means the natural or legal person, authority, organization or other agency that makes decisions individually or together with other parties regarding the purposes and means for processing personal data;

iv. **"LOOP PayCo LTD"** includes all its subsidiaries and affiliates (hereafter referred to as "LOOP", "we", "us" or "our");

v. **"NCBA GROUP"** includes all its subsidiaries and affiliates (hereafter referred to as "NCBA");

vi. **"Messaging Platforms"** means third-party messaging applications and services through which users may interact with LOOP for purposes of accessing products, services, customer support and communications.

vii. **"Online and Mobile Financial Services"** means the services we offer on our online and mobile platforms;

viii. **"Processing"** means an operation or activity or set of operations or activities performed on personal data whether or not by automated means;

ix. **"Processor"** is a natural or legal person, authority, organization or other agency that **processes** Personal Data on behalf of the Controller;

x. **"Sub-processor"** is the contractual partner of the Processor, engaged to carry out **specific** processing activities on behalf of the Processor;

xi. **"Third Party"** means a natural or legal person, public authority, agency or body other than the Data Subject, Controller, Processor, Sub-processor, and persons who, under the direct authority of the Controller, Processor or Sub-processor, are authorized to process Personal Data;

xii. **"Website"** means [https://Loop.co.ke/]

b) In addition to the definitions above, unless the context requires otherwise:

i. Definitions of terms in our general terms and conditions shall be applicable to this Policy;

ii. The singular shall include the plural and vice versa;

iii. A reference to any one gender, whether masculine, feminine or neuter, includes the other; and
iv. All the headings and sub-headings in this policy are for convenience only and are not to be taken into account for the purposes of interpreting it.

## THE DATA WE COLLECT

a) We may collect, use, store and transfer different kinds of Personal Data about you which we have grouped as follows:
i. Identity data which includes name, username or similar identifier, Identity card/Passport number, PIN number, photo, marital status, property details, family details including names of your children and parents, fingerprints, race, nationality, ethnic or social origin, color, age, title, date of birth and gender, and any other similar information;
ii. Contact data which includes billing address, postal address, physical address, email address and telephone numbers;
iii. Financial data which includes any wallet account details, card payment details and other electronic or non-electronic payment details;
iv. Transaction data, which includes details about payments to and from you and other details of products and services you have acquired from us;
v. Technical data which includes internet protocol (IP) address, your login identity data, browser type and version, time zone setting and location data where applicable, browser plug-in types and versions, device information, operating system and platform, and other technology on the devices you use to access our systems;
vi. For Merchants utilizing the LOOP POS System, we additionally collect Business Performance Metrics, Inventory Data, Employee access logs when they access the POS System and Bank settlement Information as well as reconciliation data.
vii. Profile data which includes your profile identification information, purchases or orders made by you, your interests, preferences, feedback and survey responses;
viii. Usage data which includes information about how you use our website, products and services;
ix. Interaction data including chat content and other metadata exchanged when you interact with us via Messaging Platforms including responses, preferences, timestamps, delivery/read status and any other information you share through such channels;
x. Marketing and communications data which includes your preferences in receiving marketing information from us and our third parties and your communication preferences;
xi. Visitors' personal information/identification details on our premises;
xii. Biometric data such as fingerprint, images, voice and other similar information, surveillance footages by CCTV cameras on our premises;
xiii. Employment information such as employment history and educational background.

b) We also collect, use and share aggregated data such as statistical or demographic data. 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.

c) Minor's personal information is not collected/processed unless with the consent of a legal guardian or parent.

## HOW YOUR PERSONAL DATA IS COLLECTED

We will collect and process data about you from the following sources:
a. Information you give us: This is information about you that you give us by filling in forms that we give to you or by corresponding with us by phone, e-mail, Messaging

Platforms or otherwise. We use different methods to collect data from and about you including through direct interactions. This includes the personal data you provide when you:

i. Apply for or use our products or services;
ii. Open an account(s) with us;
iii. Subscribe to our services or publications;
iv. Request marketing information to be sent to you;
v. Enter a competition, promotion or survey;
vi. Give us feedback or contact us;
vii. Interact with us via Messaging Platforms such as Whatsapp, including automated chat services (chatbots) or human-assisted support channels.
viii. Use guest/ visitor's Wi-Fi on our premises; or
ix. Pay using our services.

b. Information we collect about you: With regard to each of your user visits to our Website and your use of our Online and Mobile Financial Services we will automatically collect the following information:

i. Technical information, including the Internet protocol (IP) address used to connect your computer or mobile phone to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform. We collect this personal data by using cookies, server logs and other similar technologies. We may also receive technical data about you if you visit other websites employing our cookies;

ii. Information about your visit, including the full Uniform Resource Locators (URL), clickstream to, through and from our site (including date and time), products you viewed or searched for page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), methods used to browse away from the page and any phone number used to call our customer service number; and

c. Information we receive from other sources:

i. We receive your Personal Data from third parties who provide it to us. We will receive Personaal Data about you from various third parties to whom you have consented and public sources including but not limited to: companies registry, lands registry and other government registries; service providers we interact or integrate with now or in future; Integrated Personal Registration Systems, Kenya Revenue Authority and the National Transport and Safety Authority database.

ii. We may collect information about you from other publicly accessible sources not listed above. We may also collect information about you from trusted partners, not listed above, who provide us with information about potential customers of our products and services;

iii. We receive your Personal Data from third parties, where you purchase any of our products or services through such third parties; and

iv. We collect Personal Data that you manifestly choose to make public, including via social media (e.g., we may collect information from your social media profile(s), to the extent that you choose to make your profile publicly visible.

d. Our Website may include links to third-party websites, plug-ins, cookies 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 or influence the data collected and are not responsible for their privacy policies. When you leave our Website, we encourage you to read the privacy policy of every website you visit and understand your rights therein.

e. When you interact with us through Messaging Platforms, we collect Personal Data that you provide directly through such interactions, as well as metadata associated with your communications.

These platforms are operated by third parties and may independently collect and process your Personal Data in accordance with their own privacy policies.

f. When you visit one of our LOOP Stores or facilities (hereinafter premises), your image may be captured *via* one or more closed circuit television (CCTV) cameras located within the premises. These images are collected mainly to help us address security issues. The images may be used in the event of an incident occurring in one of our premises and may help to clarify what happened. Our use of CCTV relies on the lawful basis of legitimate interest to prevent crime and protect our employees, users and customers.

g. It is important that the Personal Data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us. If case you wish to correct or update your Personal Data that we hold, you may do so by visiting us at any of our branches, or writing to us at Support@LOOP.CO.KE

## HOW WE USE YOUR PERSONAL DATA

a. We will only use your Personal Data where we have your consent or another lawful basis to process the same.
Where we need your consent to use your Personal Data for a specific purpose, you have the right to choose whether to provide or withhold your consent. Providing your consent means that you agree to your Personal Data being used for the specific purpose as provided in this Privacy Policy. This allows us to deliver our services to you effectively, including personalizing your experience and receiving relevant information, updates and offerings. Where you withhold your consent, please note that this may limit or affect your ability to access our products and services.

Most commonly, we will use your Personal Data in the following circumstances:

i. Where we need to undertake certain processes in order to enter an agreement with you, and where we need to perform the agreement we have entered with you;

ii. 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. Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service or product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests; and/or

iii. Where we need to comply with a legal obligation.

b. We have set out below, in a table format, a description of all the ways we plan to use your Personal Data, and the basis 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.

| How we use your Personal Data | Lawful Basis for processing your Personal Data |
|---|---|
| Registration and Onboarding | a. Compliance with a legal obligation<br>b. Processing is necessary for performance of our contractual obligations to you or to take steps to enter into an agreement with you.<br>c. Our legitimate interests to operate our business and provide financial services to you<br>d. We have obtained your prior consent to the use and processing of your personal Data. |
| Provision of the Financial Services (including processing transactions, operation of consumer and merchants accounts e.t.c) | a. Compliance with a legal obligation.<br>b. Processing is necessary for performance of our contractual obligations to you<br>c. Our legitimate interests to operate our business and |

| | | | |
|---|---|---|---|
| | provide financial services to you | relationships and experiences etc.) | and processing of your personal Data. |
| KYC, Fraud and Crime Prevention (including credential authentication, transaction monitoring, anomaly detection, risk assessment) | a. Compliance with a legal obligation<br>b. Our legitimate interests to operate our business and provide financial services to you.<br>c. Protection of your vital interests and account security | Business Management (including preparing financial records, audits, testing, compliance with our regulatory reporting and other corporate governance requirements.) | a. Compliance with a legal obligation.<br>b. Our legitimate interests to operate our business and provide our services to you |
| Business Operation and Maintenance (including operation of LOOP's website and other platforms, troubleshooting, incident management, data analysis, product and system testing, payment settlement and reconciliation, system optimization and maintenance, support, business performance reporting etc.) | a. Our legitimate interests to operate our business and provide financial services to you<br>b. Processing is necessary for performance of our contractual obligations to you. | Marketing (including marketing of our products & services and recommendations of other products & services, promotions, campaigns etc.) | a. We have obtained your prior consent to the use and processing of your personal Data. |
| Customer Relationship Management (including notifying the client about their use of the LOOP's products and services and any changes to applicable Terms and Conditions; responding to customer enquiries, correspondence, technical support requests and complaints handling etc.) | a. Processing is necessary for performance of our contractual obligations to you or to take steps to enter into an agreement with you<br>b. Our legitimate interests to operate our business and provide financial services to you<br>c. We have obtained your prior consent to the use and processing of your personal Data. | | |
| Business Development (including data analytics to improve our website, API, products, services, customer | a. Our legitimate interests to operate our business and provide financial services to you<br>b. We have obtained your prior consent to the use | | |

a. We may collect special categories of Personal Data about you (this includes details about your race or ethnicity, trade union membership, next of kin or family details, information about your health, criminal convictions and offenses and biometric data.)

| How we use your special category data | Basis for processing your special category data |
|---|---|
| For Know Your Customer (KYC) formalities;<br>To carry out verification, anti-money laundering and sanctions checks;<br>To detect, monitor, investigate and report fraud and criminal activity;<br>To manage security, risk and crime prevention for us and our customers by way of ongoing due diligence, monitoring and screening | a. We have obtained your prior consent to the use and processing of your special category data.<br>b. We have a legitimate interest in carrying out the processing for the purpose of providing products and services to you.<br>c. The processing of your special category data is necessary for compliance with legal and regulatory obligations. |

| | |
|---|---|
| | d.The processing of the special category data is vital in protecting public interests. |
| We may use your medical information to manage our services and products to you e.g. to apply for quotations for an insurance product, postpone your debt repayments etc. | a. The processing of the special category data is vital in protecting public interests.<br>b. Processing is necessary to protect the vital interests of any individual.<br>c. We have obtained your prior consent to the use and processing of your special category data. |

## AUTOMATED DECISION-MAKING

a. We may use automated processes to analyze certain types of your Personal Data in order to make decisions that enable us to provide and manage our products and services. These processes may include assessing eligibility for selected products, detecting fraud or unusual activity and informing credit-related decisions. We may also use your Personal Data to facilitate interactions through Messaging Platforms, including automated decision-making tools (such as chatbots), to improve service delivery, respond to queries, and enhance user experience. Where such processing significantly affects you, you have the right to request human intervention.

b. We only use automated decision-making where it is necessary for entering into or performing a contract with you, or where you have provided your consent. We take the necessary steps to ensure that any automated processing is fair, transparent and subject to appropriate security safeguards, including regular testing and monitoring to minimize errors or bias.

## MARKETING

- We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. We have established the following personal data control mechanisms;

a. 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 to you. You will receive marketing communication from us if you have requested information about our products and services, and if you have opted in to or not opted out of receiving such information.

b. Third-party marketing: we may share your Personal Data with any third party for marketing purposes where we believe that the marketing information from such third parties will be relevant to you and where we have obtained your prior consent.

### Opting In and Out

a. You may Opt in or Out of receiving Marketing Communications by setting your preferences when you first sign up to the LOOP app. This is done by sliding the toggle option to the right to indicate **'Yes to Marketing"** or leaving it to the left to indicate **'No to Marketing'**. If you choose to opt in to marketing, you will receive updates about Product Offerings, Exclusive Deals, Partner discounts, Cashbacks and Seasonal rewards.

b. You can adjust your Marketing Preferences anytime under the Profile Settings on your LOOP app. You can also opt out by using the links included in any marketing messages we send to you or by contacting us through the channels provided in this Privacy Policy.

c. You can ask third parties to stop sending you marketing messages any time by contacting them and following their opt out process.

d. Where you opt out of receiving marketing messages, this will not apply to Personal Data provided to us as a result of product or service subscribed to, warranty registration, product or service experience or other transactions.

## HOW WE USE "COOKIES" ON OUR WEBSITE

a. We may place electronic "cookies" in the browser files of your computer when you access our Website. Cookies are pieces of information that our website transfers to your computer to enable our systems to recognize your browser and to tailor the information on our Website to your interests. For example, if you previously visited our Website and inquired about particular services over the Website, cookies enable us to present information tailored to your account and/or those particular interests the next time you visit the Website. Moreover, we, or our third-party service providers or business partners may place cookies on your computer's hard drive that can be matched to other personal information we maintain about you to pre-populate certain online forms for your convenience. We also use cookies to analyze visitors' use of our Website. This analysis helps us better understand which areas of our sites are most useful and popular, to enable us to plan improvements and updates accordingly.

b. Many web browsers are automatically set to accept cookies. You may change your computer's web browser settings to either reject cookies or notify you when a cookie is about to be placed on your computer. Please note, however, that rejecting cookies while visiting our Website may result in certain parts of the website not operating as efficiently as if the cookies were allowed. Please refer to our Cookie Policy for more details.

## THE USE OF HYPERLINKS

a. Other URLs may be referenced through hyperlinks on our website. Clicking on these links may open webpages operated by third parties not associated with us. These hyperlinks are for dissemination of information and for you to have a good user experience.

b. By clicking on a hyperlink, you will leave the webpage and accordingly you shall be subject to the terms of use, privacy and cookie policies of the other website that you choose to visit. By navigating to an externally linked website on the webpage, you will be exiting our website and you will be exposed to new terms of use, privacy policy and cookie policies of the website you have visited. We do not in any way promote, recommend, endorse, guarantee or approve a third-party products and services offered through hyperlinks for external webpages. Material or content found in hyperlinks for external websites is not in our control and data processing is in accordance to their privacy policy.

## CHANGE OF PURPOSE

a. We will only use your Personal Data and special category data for the purposes for which we collected it as indicated in this Privacy Policy or for reasons we give you during the collection of the data.

b. If we need to use your Personal Data for an unrelated purpose, we will notify you and seek your consent where necessary.

c. Please note that we may process your Personal Data without your knowledge or consent if this is required or permitted by law.

## DISCLOSURE OF PERSONAL INFORMATION

a. We may disclose your Personal Data to other entities, the affiliates of LOOP, for legitimate business purposes (including providing services to you and operating our sites and systems), in accordance with applicable law. In addition, we may disclose your Personal Data to:

i. Government (including law enforcement) authorities and regulators e.g. Central Bank of Kenya

ii. Other financial institutions through which your transactions are processed;

iii. Other companies and financial institutions that we work with to provide services to you e.g. Credit card service providers, technology service providers, credit reference bureaus, employers, debt collection agencies and outsourced services vendors; fraud prevention/detection, private investigators, agencies tasked with conducting surveys on behalf of LOOP or NCBA Group;

iv. Third parties with accruing legal obligations e.g. Trustees and executors, guarantors, anyone holding a power of attorney to operate an account on your behalf and joint account holders;

v. Third parties with reference to acquisition, merger, asset sales, restructuring or by legal obligation or otherwise. We may also transfer your personal data to any of our subsidiaries, new owners, successor entities, or in case of change of business; your

personal data may be used in the same way as in this Privacy Policy;

vi. Third Parties for POS Services including Payment Service Providers (i.e. card payment processors, card schemes and acquiring banks), Mobile Money Operators where you utilize mobile money payments services, Payment Gateway Providers, PIN Validation SDK Vendor for transaction authentication and Technology Infrastructure providers.

vii. Third parties who are service providers acting as processors, professional advisers including lawyers, bankers, auditors and those who provide consultancy, banking, legal, insurance and accounting services.

viii. Restricted or publicly accessible government repository as a verification procedure in compliance with regulations.

ix. Regulatory authorities, police or security agencies, courts of law or statutory authorities in response to litigation and demand issued on legal/regulatory grounds in accordance to the law.

x. Agencies tasked with conducting surveys on behalf of LOOP.

xi. Emergency and disaster response providers in cases where a person's health and safety is at stake when an emergency call is made.

xii. Third Party fulfillment partners for purposes of processing and delivering LOOP products and services you use or order.

b. We require all third parties to respect the security of your Personal Data 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.

## TRANSFER OF YOUR PERSONAL DATA OUTSIDE KENYA

a. We may need to transfer or store your information in another jurisdiction to fulfill a legal obligation, to enable performance of our contractual obligations to you, for our legitimate interest and to protect the public interest.

b. Insofar as is required for providing our services, we use third party service providers who are located outside Kenya or store your information (including your sensitive personal data) outside Kenya, including in countries that may have different data protection laws from those in Kenya.

c. When we, or our permitted third parties transfer or store information outside Kenya, we or they will ensure that it is lawful and that it has an appropriate level of protection, including transfer to jurisdictions that have established data protection laws, and entering legally binding agreements to ensure the security of your Personal Data.

d. Where your information is transferred to affiliates of LOOP in other countries, we ensure that your Personal Data is protected by requiring that they follow the same rules when processing your Personal Data.

e. We may also transfer your information across country borders where you have consented to the transfer.

f. If we transfer your information outside Kenya in other circumstances (for example, because we have to provide such information by law), we will use best endeavours to put on place appropriate safeguards to ensure that your information remains adequately protected.

## HOW WE KEEP YOUR INFORMATION SECURE

a. We have put in place appropriate security measures to prevent your Personal Data from being 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.

b. 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.

c. We maintain industry-recognized security standards, including certification under the Payment Card Industry Data Security Standard (PCI DSS) for the secure processing, storage, and transmission of payment card data. We are also duly registered with the Office of the Data Protection Commissioner as both a Data Controller and Data Processor, in

compliance with applicable data protection laws.

d. While we implement appropriate security measures, communications conducted via Messaging Platforms may be subject to inherent security risks associated with third-party platforms. We encourage you to exercise caution and avoid sharing sensitive personal data unless necessary and requested through official channels.

## HOW LONG WE SHALL RETAIN YOUR PERSONAL DATA

a. We will only retain your Personal Data for as long as reasonably necessary to fulfill 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 of our relationship with you.

b. 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.

c. By law we have to keep basic information about our customers (including contact, identity, financial and transaction data) for a minimum of seven years after they cease being LOOP customers. Our internal policy as amended from time to time may also require us to keep customer data for a longer period.

d. 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.

## DATA SUBJECT'S RIGHTS

a. Subject to legal and contractual exceptions, you have rights under applicable laws in relation to your Personal Data. These are listed below:

i. Right to be informed that we are collecting your personal information and how we are processing it;

ii. Right to rectify your personal data where it is inaccurate or incomplete;

iii. Right to withdraw your consent to processing of your personal data. However, we may continue processing your personal data for legitimate interests or legal grounds. Please note that your withdrawal will not affect the lawfulness of our processing which was based on prior consent before your withdrawal. In some instances, we will not be able to provide our products and services if you withdraw your consent;

iv. Right to object to processing of all or part of your personal data. However, we may decline your request if we are obliged by law or entitled to do so;

v. Right of erasure of your personal data held by us, noting that we may continue to retain your information if we are entitled to do so or obliged by law;

vi. Right to access your personal data in our possession;

vii. Right not to be subjected to profiling or automated decision making in regards to processing of your Personal Data. However, we may decline your request where it is necessary in order to perform the contract we have with you, or if we are obliged by law to do so;

viii. Right to request your personal data to be processed in a restricted manner. Note that we may continue processing data and reject the request if we are entitled to or are legally obliged; and

ix. Right to data portability in a manner we may deem appropriate such as electronic format;

b. Exercising Your Data Protection Rights: We are committed to ensuring that you can easily exercise your data protection rights in compliance with applicable regulations. To exercise any of the above rights you can make a request through the 'Contact Us' page on the website (https://loop.co.ke/contact-us), or by populating and submitting to us the Data Subject Rights Request Form that can be downloaded here or contacting our Data Protection Officer (DPO) using the contact details provided in this Policy. If you believe that we have not adequately addressed your data protection concerns, you have

the right to lodge a complaint with the appropriate regulatory authority.

c. 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.
d. We try to respond to all legitimate requests within reasonable time. Occasionally it could take us longer 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.

## COLLECTION OF PERSONAL DATA ON CHILDREN

a. Protecting the privacy of children is of utmost importance to us. LOOP recognizes that processing children's data carries inherent risks due to its sensitive nature, hence the need for heightened protection. As minors lack the legal capacity to provide informed consent and are vulnerable to identity theft, fraud and exploitation, LOOP has implemented robust safeguards to ensure children's privacy and data security.

b. At LOOP, we process personal data relating to children only with the consent provided by their parents or legal guardians. In acknowledging the importance of parents' and legal guardians' consent and supervision in children-related matters, we require parental signatures as authorization for the use of a child's information in the provision of LOOP's products and services, or involvement in LOOP'S activities. If you believe that we have inadvertently processed Personal Data relating to a minor, please contact our Data Protection Office using the contact details provided in this Privacy Policy.

## INTERNAL COMPLAINT HANDLING PROCEDURE

a. We take data protection seriously and strive to address any concerns promptly and effectively. If you have concerns or questions regarding the handling of your Personal Data, you can reach out to our Data Protection Office using the contact details provided in this Policy.

b. Upon receiving your complaint, our DPO will initiate an internal review process to investigate and resolve the issue. We will respond to your questions or concerns within fourteen (14) days of receipt. More complex queries may take time to resolve and we will keep you informed if this is the case with your query. If you are dissatisfied with the outcome of our internal resolution process, you have the right to escalate your complaint to the appropriate regulatory authority.

## NON-COMPLIANCE WITH THE PRIVACY POLICY

LOOP reserves the right to discontinue any agreement in case of compliance failure for the provisions in this Privacy Policy and decline any application for information that contradicts this Privacy Policy.

## CHANGES TO THIS PRIVACY POLICY

A copy of this Policy can be downloaded here. We may modify or update this policy from time to time. Where the changes will have a fundamental impact on the nature of the processing of your data or your rights, we shall notify you in advance.

## HOW TO CONTACT US

In case you would like to contact us with reference to the terms of this privacy policy, or in order to exercise any of your rights in relation to your Personal Data, you can reach us through the below contacts.

The Promenade 6th Floor, General Mathenge Drive
P.O Box 44599-00100, Nairobi
Tel: +244709714444 or 0730714444
Email: Support@loop.co.ke
**Data Protection Officer/ Data Protection Team:** dpo@loopdfs.com
Statement updated: JUNE 2026