



Privacy Policy

Date: July 2024

We respect your privacy and treat your personal information as confidential.

Our Privacy Notice explains how we use, collect and share your personal information.

1. Our commitment:

This notice is important to us. We are committed to taking steps to protect your privacy when you use our websites (www.usekayko.com and www.kayko.rw) or use our Apps (collectively the “App”) and implementing business practices that comply with all relevant legislation, including the law N°058/2021 of 13/10/2021 relating to the protection of personal data and privacy ("DPO") and the EU General Data Protection Regulation (“GDPR”). In this policy, we explain how we will use and protect your personal information.

2. What is personal information?

If we refer to "personal information" or "information" in this policy, we mean personal information as defined in DPO. It includes, for example, your full name, surname, email address, identity number, contact details, and location.

3. Information we collect about you

We generally collect, store and use the following information: your first name(s), surname, address, phone numbers, e-mail address, IP address or cookie information, location information, demographic information including your age and gender, information from your browser including your hardware model, operating system version, unique device identifiers and any other information which we reasonably need to perform our obligations in terms of the agreement with you when you purchase or use our services. When you use our services, we also record the details of your transactions.

4. Sources of information we collect about you include:

We collect information about you from the following categories of sources:

- You directly, when you sign up to become a Kayko merchant;
- Your devices (e.g. computers, mobile phones and tablets) when you interact with our App;
- Other sources, including online advertising and third party analytics companies;
- Third party service providers that provide services to us that enable us to provide our services to you and make our App available to you and;
- Publicly available sources.

5. How we use your information:

We use your information to provide our services to you and generally for purposes of our relationship. In some instances, we collect and store information about your location. We convert your IP address or mobile GPS data into a rough geo-location. We may use location information to improve and personalize our services for you. We also record where you are when you accept payments using our services. You can set your web browser to refuse cookies, but if you do this you may not be able to enjoy the full use of our App and you may not be able to take advantage of certain promotions we may run.

6. Purposes of Processing Personal Information

We will only process adequate and relevant information to:

- Provide services set out in our agreement with you;
- Operate and manage your merchant account;
- Monitor and analyze our business;

- Contact you by email, SMS, or other means to tell you about our products and services (you can always opt out from future marketing);
- Form a view of you as an individual and to identify, develop or improve products that may interest you;
- Carry out market research, business and statistical analysis;
- Carry out audits;
- Perform other administrative and operational tasks like testing our processes and systems;
- Comply with our regulatory or other obligations; and
- To enable our service providers to provide services to us to enable us to provide our services to you.

The information you provide or we collect is used for:

- The purpose of contracting with you in general,
- Enabling you to accept payments securely, in compliance with applicable regulations;
- Using our point-of-sale services;
- Using other products and services we may offer to you;
- Responding to your requests for certain information, products or services;
- Customizing the content you see;
- Communicating with you about new offers;
- Internal reporting and development; and
- Any other purpose for which you give your permission, or where we are otherwise permitted or required in terms of the law to use such personal information, or for some purpose in the public interest.

We sometimes put all our data (yours and data from other users) together. This type of aggregate data enables us to figure out how often users access our services so that we can make Kayko more appealing and improve our services. We share this type of

statistical data so that our partners also understand how often people use their services and ours, so that they, too, may provide you with an optimal experience.

7. Quality and access to your information:

We want to ensure that your information is accurate and up to date. You may ask us to correct or remove any information that you think is inaccurate, by sending an email to privacy@kayko.rw

8. Right to object:

You may, on reasonable grounds, object to us using your information directly to us. If you object, we will stop using your information, except if the law allows its use.

9. Lodging a complaint:

If you believe we are using your information unlawfully, you may lodge a complaint with the Data Protection Office. Contact details of the information regulator are available online through: <https://dpo.gov.rw>.

10. Children's information and special personal information:

We do not intentionally collect or use information of children (persons under the age of 18 years) unless with consent. Our intention is to only process information of children with the consent of a competent person (someone like the parent or guardian or if the law otherwise allows or requires us to process such information).

11. Sharing of personal information:

We respect your privacy and we hate spam as much as you do. We will keep your personal information confidential and only share it with others in terms of this policy, or if you consent to it, or if the law requires us to share it. We have trusted relationships with carefully selected third parties who perform services for us. All these service providers have a contract with us in terms whereof they have a legal obligation to secure your personal information and to use it only in a way that we permit.

12. How secure is your information?

We are committed to implementing appropriate technical and other security measures to protect the integrity and confidentiality of your information and do so through the use of bank level security software. We protect and manage information that we hold about you by using electronic and computer safeguards such as firewalls, data encryption, as well as physical and electronic access control to our buildings. We only authorize access to information to those employees who require access to fulfill their designated responsibilities.

13. Retention of information:

We retain information in accordance with the required retention periods by law or for legitimate business purposes. We will only retain your information for the purposes explicitly set out in this policy. We may keep information indefinitely in a de-identified format for statistical purposes. This policy also applies when we retain your information.