
WEBSITE & MOBILE APP PRIVACY POLICY

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Definitions

“Data Controller” means a person who alone or jointly with others, determines the purposes and means of which personal data is to be processed, regardless of whether or not such data is processed by such person or agent on that person’s behalf. Letshego Ghana Savings and Loans Plc is the data controller;

“Data Protection Act, 2012 (Act 843)” means the Act that regulates the protection of personal data in Ghana;

“Data Subject” means the individual who is the subject of personal data;

“LG” Letshego Ghana Savings and Loans Plc;

“Personal Data” refers to any information relating to you such as identification number, name, marital status, government-issued identification number, email address, personal telephone number, picture, one or more factors specific to the individual’s physical, physiological, mental, economic, cultural or social identity amongst others.

“Processing” refers to any operation or set of operations performed on personal data whether or not by automated means, such as collection, recording, organization, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;

“Sensitive personal data” means personal data relating to a data subject which reveals his or her racial or ethnic origin, political opinions, religious beliefs or philosophical beliefs, membership of a trade union, physical or mental health or condition, sexual life, filiation or personal financial information and includes any commission or alleged commission by him or her of any offence, any proceedings for any offence committed or alleged to have been committed by him or her, the disposal of such proceedings, or the sentence of any court in such proceedings; and genetic data, biometric data and the personal data of minors.

1. Introduction

- 1.1. At Letshego Ghana Savings and Loans PLC (“Letshego”, “we”, “us”, “our”), we are committed to protecting your privacy. We recognize that you are the ultimate owner of your personal data, and you have the right to know about how we handle your data. The purpose of this notice is to inform our data subjects how we handle their personal information and for which purposes.
- 1.2. This notice applies where we are acting as a Data Controller with respect to the personal data of our customers, physical site visitors, website and mobile application users. As a Data Controller, we determine the purposes and means of processing of the personal data that we collect. We also comply with our obligations as a Data Processor in compliance with the Ghana Data Protection Act 2012 (“DPA”). We would additionally like to inform our concerned stakeholders that we take stringent measures per this privacy notice to ensure the confidentiality of your data. We use the most state-of-the-art security technology and systems to protect your personal data against fraud, unauthorised access and alteration and loss of information.

2. Data Protection Representative and How to Contact Us

- 2.1. To fully meet its obligation under the DPA, Letshego Ghana Savings and Loans Plc has appointed an internal Data Protection Representative (hereafter referred to as the “DPR”) to handle all matters related to privacy and data protection.
- 2.2. If you have any questions, request to update your information or concerns about the processing of your personal data or to exercise your rights, please contact our DPR at:
 - i. Akua Owusua Donnir
 - ii. akuad@letshshego.com

3. Types of Personal Data We Collect

- 3.1. We may collect your personal data in the following ways:
 - i. Through forms, brochures or other material at our physical service point.
 - ii. Verbally, when you interact with our call centre agents.

- iii. Through phone call recordings which contain personal data.
- iv. Via online forms on our website or mobile application including Digital Mall.
- v. When you send queries, requests or complaints to LG.
- vi. When you request for an update of the information that we hold on you.
- vii. From third parties like banks and your place of work who may need to provide us with some of your information to enable us to proceed with your transactions.
- viii. Via cookies when you browse and/or interact on our website.

3.2. The types of personal data that are collected and processed may include:

Categories of Personal Data:	Details:
Contact Details	Name, address, residential phone number, mobile number, email address, postal address, beneficiary's name, emergency contact, next of kin names and contact information
Individual details	Gender, date of birth, place/ country of birth, occupation, industry, nationality, marital status, home village, village headman, village ward
Employment details	Employee number, department, designation, employee status, employer name, engagement date, date of retirement/contract end date, employer telephone
National identification details	National Identification Number (including ID expiry date), Passport Number
Physical security Information	CCTV Footage
IT information	IP addresses, browser type and version, access time and length of access, page views, user activity and website usage in log files, time zone, user's phone data required for app functionality

Categories of Personal Data:	Details:
Credit risk and Anti-Fraud Details	Source of income, credit score, purchase history, credit history
Sensitive personal data	<p>Financial Information: Bank account number, name of account, salary details (basic salary, gross salary, net pay), remittance amount, loan product, loan amount, arrear period, policy number, loan number, transaction history, reason for default</p> <p>Other sensitive information: PEP status, criminal convictions</p>
Others	Purchase details, complaints, enquiries, service requests, and other communications.

3.3. Information Access on the Devices

- i. We may access information on your device solely for the transaction. The information will not be stored as part of our data and/or used for marketing purposes. We will always request your consent before accessing data from other applications and inform you of how we intend to use it.
- ii. LG will request to access the contacts on your device to enable you to transfer money to a Letshego account to ensure that the correct person will receive the transfer.

4. Purposes of Processing Personal Data

- 4.1. LG will only use your personal data for the purposes for which it was collected or agreed with you. We process your personal data for the following purposes:

- i. Regulatory purposes, including KYC remediation, due diligence, filing returns and financial reporting;
- ii. Customer Onboarding;
- iii. Offering and providing you with our services;
- iv. Loan application, processing and tracking;
- v. To assess affordability and eligibility of customers to take a facility or loan/ credit risk assessment;
- vi. Transactional and remittance purposes;
- vii. To provide information to Credit Agencies;
- viii. Communication and Direct marketing including calls, SMS, and emails;
- ix. Customer experience and surveys;
- x. Handling inbound customer calls and queries;
- xi. Analyse our website's performance;
- xii. Application functionality and Analytics;
- xiii. Account Management;
- xiv. Verification of customer identity to facilitate the processing of customer requests;
- xv. Detection and prevention of fraud;
- xvi. To have access to your contacts on your personal device to enable you to transfer money to Letshego Ghana Savings and Loans Plc account;
- xvii. For audit purposes.

We will not use your personal data for any automated individual decision-making which will have a significant impact on you.

5. Disclosure required by law or made in connection with a legal proceeding—Section 66 DPA

Personal data is exempt from the provisions on non-disclosure where the disclosure is required by or under an enactment, any rule of law or by the order of a court. We rely on various legal bases for processing personal data, including:

5.2.

- i. Performance of Contract: processing is necessary for the performance of a contract to which you are party, or in order to take steps at your request prior to entering into a contract.
- ii. Legal Obligation: the processing is necessary for compliance with a legal obligation to which we are subject.
- iii. Legitimate interest: the processing is necessary for a purpose that concerns our legitimate interest, or of a third party to whom personal data is provided, except where such interest is overridden by the interest to protect the fundamental rights and freedoms of the data subject and in particular the right to privacy.
- iv. Consent: you have given your consent in writing.
- v. The processing is authorised by any other written law, for any reason of substantial interest to the public
- vi. Legal Purposes: where it is necessary
 - a. in connection with any legal proceedings, including prospective;
 - b. legal proceedings;
 - c. for the purpose of obtaining legal advice;
 - d. For the purposes of establishing, exercising or defending legal rights; or for the administration of justice.

5.3. In compliance with Section 35 of the DPA, Right of access to personal data

- i. A data controller shall inform an individual who is the data subject of the processing of the individual's personal data by the data controller or another person on behalf of the data controller;
- ii. Give to the data subject, a description of
 - a. the personal data of which that individual is the data subject;
 - b. the purpose for which the data is being or is to be processed; and
 - c. the recipient or class of recipients to whom the data may be disclosed;
- iii. communicate in an intelligible form to the data subject
- iv. Information which constitutes personal data of which that individual is the subject;

- v. Information which is available to the data controller as to the source of the data; and
- vi. Inform the individual who is the data subject of the logic or rationale behind the decision that was made based on the processing where the processing constitutes the sole basis for the taking of a decision which significantly affects that individual

6.0 Obligatory or Voluntary Information

- 6.1. To effectively engage in business transactions and fulfil our contractual obligations, certain information is mandatory for you to provide. These mandatory information include, but are not limited to, your business contact details, banking information for payment processing, and necessary documentation for compliance with legal and regulatory requirements. Failure to provide this obligatory information may impact our ability to engage in and maintain a business relationship with you.
- 6.2. If you choose to provide more information beyond what is required, we will evaluate its necessity for our purposes. If it is determined to be unnecessary, we will promptly delete it to ensure the protection of your privacy. Your decision to share such additional data is entirely at your discretion, and we will handle it with care and respect for your privacy preferences.

7. Who has access to your personal data?

- 7.1. Access to your personal data within LG
 - i. Employees who may have access to your personal data are required to keep that data strictly confidential.
 - ii. We employ security procedures at our facilities such as Closed-Circuit Television (CCTV). Any monitoring of our facilities, systems or assets is performed in accordance with applicable law.
- 7.2. Access to your personal data by third parties
 - i. LG may need to share your personal data with third parties which assist us in fulfilling our responsibilities regarding the purposes listed above. These include third parties

which provide services to us such as banking services, insurance services or third-party companies which provide software and tools to us. Our service providers include:

- EspoCRM for Customer Relationship Management
 - Mitel Contact Centre Software for customer communications and customer calls management
 - Corporate Business Solutions
 - MRI Ghana for managing customers' calls into the contact centre for requests, complaints and queries amongst others
 - Neostats for Digital Marketing
 - 60Decibels for customer impact surveys
 - Briisk Ltd for insurance distribution
 - MoEngage to analyse customer engagements and provide insights
 - Voodoo Agency for advertising and communications
 - Business and Enterprise Solutions Ghana for customer experience
 - Siron Anti-Financial Crime Solutions to detect financial crimes and suspicious activities
 - Dow Jones for AML Controls, Oversight and Reporting
 - Credit Agencies to assess credit worthiness of customers, for responsible lending and for the standardisation of credit information.
- ii. We are also required to disclose your personal data where processing is necessary for us to comply with our legal obligations, including responding to legal processes or lawful requests or where:
- a. We have a duty or a right to disclose in terms of law or for national security and/or law enforcement purposes;
 - b. We believe it is necessary to protect our rights;
 - c. We need to protect the rights, property or personal safety of any member of the public or a customer of our company or the interests of our company; or
 - d. You have given your consent.

We require our service providers and other third parties to keep your personal data confidential and that they only use the personal data in furtherance of the specific

purpose for which it was disclosed. We have agreements in place with our processors to ensure that they comply with these privacy terms.

8. Personal Data Security

- 8.1. We prioritise the security of your personal data and have adopted an Information Technology and Cyber Security Policy to ensure the preservation of confidentiality, integrity and availability of all physical and electronic information assets including personal data throughout LG.
- 8.2. In the event of a personal data breach at LG involving your personal data, we will manage it according to our Incident Response Plan to minimize the effects of the breach and ensure that the rights and freedoms of our stakeholders are maintained. The Data Protection Supervisor will contact you to fill out the Personal Data Breach form and then submit it to the appropriate regulator.
- 8.3. Please note that Letshego Ghana Savings and Loans Plc will never contact you in person, telephonically or via any other means to request any authentication information, for e.g. any password or passphrase or pins. Never give anybody including anybody from Letshego Ghana Savings and Loans Plc your PIN, password, or passphrase.

9. Log Files

- 9.1. All Applications and Web services log information for statistical purposes and ensure that transactions are correct and non-fraudulent. The principle Letshego Ghana Savings and Loans Plc follows is to exclude personal information or to delete and mask wherever personal information is logged unless it can assist in fraud prevention. Log files are typically used by the Letshego security and fraud teams and are meticulously protected to ensure security.

10. Data Retention

Subject to subsections (2) and (3) of the DPA, a data controller who records personal data shall not retain the personal data for a period longer than is necessary to achieve the purpose for which the data was collected and processed unless

- (a) The retention of the record is required or authorised by law,
 - (b) The retention of the record is reasonably necessary for a lawful purpose related to a function or activity,
 - (c) Retention of the record is required by virtue of a contract between the parties to the contract, or
 - (d) The data subject consents to the retention of the record.
- (2) Subsection (1) does not apply to records of personal data retained for
- (a) Historical,
 - (b) Statistical, or
 - (c) Research purposes

11. Your Rights

- 11.1. Under the DPA, as a data subject, you have rights we need to make you aware of. The rights available to you depend on our reason for processing your information:
- i. Right to be informed: You have the right to be informed of any personal data that we hold about you and how we are processing your personal data.
 - ii. Right of Access: You have the right to receive confirmation from us on whether we hold personal data about you and to receive a copy of your personal data within a reasonable time and potentially at a reasonable charge. In the event your request is denied, you have the right to be provided with reasons as to why we did not proceed with your request, challenge the refusal and submit your complaint to the Commissioner. If your challenge is successful, we shall proceed with your request as applicable.
 - iii. Right to Rectify/Erase: You have the right to request rectification or erasure of your personal data.
 - a. Should any of your personal data, such as your address or telephone number, undergo changes, we kindly request that you promptly get in touch with us to ensure the timely updating of our records. You may do so by:
 - visiting your closest Letshego branch to update your information or

- Using our electronic channels to update the information.
- iv. Right to object for direct marketing: You have the right to object to the intended processing, if the processing of the personal data is obtained for the purposes of direct marketing.
 - v. Right to modify and withdraw consent: You have the right to modify or withdraw your consent.
- 11.2. To exercise your right as a data subject, you are requested to contact our Data protection officer at akuad@letshego.com

12. Cookies

- 12.1. Cookies are pieces of information that any Letshego Website or Application stores on your local hard drive. This allows us to recognize you when you use our services again, confirming your previous visits to our website and use of our Internet Services.
- 12.2. Letshego Ghana Savings and Loans Plc is committed to adhering to the legal requirements and regulations of Ghana. To ensure compliance with regional laws and regulations, we consistently display a Cookie Notice on all websites where we employ cookies.

13. Your Responsibilities

- 13.1. You are responsible for the data you provide or make available to us, and you must ensure it is honest, truthful, accurate and not misleading in any way. You must ensure that the data provided does not contain material that is obscene, defamatory, or infringing on any rights of any third party, does not contain malicious code, and is not otherwise legally actionable.
- 13.2. Further, if you provide any data concerning any other person, such as a guarantor, you are responsible for providing any notices and obtaining any consent necessary for us to collect and use that data as described in this notice.

14. Transferring of Personal Data outside Ghana

- 14.1. Your personal data may be transferred to and processed outside Ghana. These transfers would always be made in compliance with the DPA. Data transfers do remain subject to existing confidentiality obligations.
- 14.2. If we transfer your data to other countries which provide a lower level of protection, we will ensure that there are appropriate safeguards in place concerning the protection of your data, such as by using appropriate contractual data processing agreements.

15. Queries and Complaints

- 15.1. If you have any questions or concern about the processing of your personal data or to exercise your rights, please contact our DPR. When contacting the DPR, you are requested to provide a clear and detailed description of your concerns. This will help us to understand the issue and take appropriate action.
- 15.2. Our DPR will acknowledge receipt of your concern and will initiate an investigation into the matter. We will strive to provide you with a timely and appropriate response typically within 30 days. If additional time is required, we will inform you accordingly.
- 15.3. If you believe that we have not handled your request appropriately, you can complain to the Information Data Protection Commission of Ghana.

16. Changes to this privacy notice

We may update this notice from time to time to reflect best practices in data management, security and control and to ensure compliance with any changes or amendments made to the DPA and any laws or regulations thereof. Our Sales and Call Centre Agents will explain the details to our customers upon request. LG ensures that users acknowledge any policy changes and accept policy amendments in their online applications or via the Call Centre before doing further business with us.