



PRIVACY POLICY

Last Updated: 16th February, 2023

At HISA Technologies Limited, we are committed to protecting your personal data and respecting your privacy. This Privacy Policy describes how Hisa Technologies Limited (hereinafter "HISA", "We" or "us") collect, store, transfer, retain, disclose, or otherwise process your Personal Data in order to maintain your account with us.

1. INTRODUCTION

1.1. This Privacy Policy together with:

- a) our guidelines for processing Personal Data and any additional terms of use,
- b) **Faida Investment Bank Limited** Terms of use available [here](#)
- c) **DriveWealth, LLC** Terms of use accessible [here](#)

together "**Terms of Use**", constitutes overall framework for how we process your Personal Data and applies to your use of:

- HISA mobile application software (App) available on our site (App Site), once you have downloaded or streamed a copy of the App onto your mobile telephone or handheld device (Device).
- Any of the services accessible through the App (Services) that are available on the App Site or other sites of ours (Services Sites), unless it is stated elsewhere that a separate privacy policy applies to a particular Service, in which case that privacy policy only applies.

1.2. This App is not intended for children and we do not knowingly collect data relating to children. Please read the following carefully to understand our practices regarding your personal data and how we will treat it.

You can download a PDF version of this Privacy Policy [here](#).

2. IMPORTANT INFORMATION ABOUT WHO WE ARE

2.1. If you have any questions about this Privacy Policy, please contact us using the details below:

Contact details

Data Controller
Hisa Technologies Limited
info@hisa.co

2.2. Changes to the Privacy Policy and your duty to inform us of changes

We may update our Privacy Policy from time to time. We reserve the right to make changes to this Privacy Policy at any time. Once any changes are made, these changes will be posted on [this](#) page and, where appropriate, notified to you by SMS or by email or when you next start the App or log onto one of the Services Sites- as far as technically and legally feasible. The new statement may be displayed on-screen and you may be required to read and accept the changes to continue your use of the App or the Services. If you disagree with any of the changes, you may contact us to close your account. Your continued use of our Services after the Privacy Policy has been updated constitutes your consent to all or any changes to our Privacy Policy.



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 our relationship with you.

2.3. Third party links

Our Sites may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. Please note that these websites and any services that may be accessible through them have their own privacy policies and that we do not accept any responsibility or liability for these policies or for any personal data that may be collected through these websites or services, such as Contact and Location Data. Please check these policies before you submit any personal data to these websites or use these services.

3. WHAT DATA DO WE COLLECT ABOUT YOU?

- 3.1. HISA collects by itself, information from you or through third parties personal information to establish your account pursuant to the relevant laws and to confirm your identity. The type of information we collect about you varies depending on the country from which you access our services.
- 3.2. Generally, we may collect, use, store and transfer different kinds of personal data about you as which include; identity data, contact data, financial data, Tax Information, transaction data, content data, profile data, usage data, marketing and communications data, Location Data as explained below.
- 3.3. Personal Data collected may be freely provided by you, or in the case of usage data, automatically collected when using this App. Unless otherwise provided, all information requested is mandatory and failure to provide this Data may make it impossible for this App to provide its services. In instances where some Data is not mandatory, you may opt not to provide such data without consequences to the availability or functioning of the App services

4. HOW IS YOUR PERSONAL DATA COLLECTED?

- 4.1. We will collect and process the following data about you:
 - Information you give us. This is information (including Identity, Contact, Financial, and Marketing and Communications Data) you consent to giving us about you by filling in forms on the App Site and the Services Sites (together Our Sites), or by corresponding with us (for example, by email or chat). It includes information you provide when you register to use the App Site, download or register an App, subscribe to any of our Services, search for an App or Service, make an in-App purchase, share data via an App's social media functions, enter a competition, promotion or survey, or other activities commonly carried out in connection with an app and when you report a problem with an App, our Services, or any of Our Sites. If you contact us, we will keep a record of that correspondence.
 - Information we collect about you and your device. Each time you visit one of Our Sites or use one of our Apps or services we will automatically collect personal data including Device, Content and Usage Data. We collect this data using cookies and other similar technologies.
 - Location Data. We also use GPS technology or other technology to determine your current location. Some of our location-enabled Services require your personal data for the feature to work. If you wish to use the particular feature, you will be asked to consent to your data being used for this purpose. You can withdraw your consent at any time by disabling Location Data in your settings or through ways stipulated or referenced as acceptable ways on withdrawal of such consent on this statement.
- 4.2. Information we receive from other sources including third parties and publicly available sources. We will receive personal data about you from various third parties and public sources.



COOKIES

We use cookies and/or other tracking technologies to distinguish you from other users of the App, App Site, the distribution platform (Appstore) or Services Sites and to remember your preferences. This helps us to provide you with a good experience when you use the App or browse any of Our Sites and also allows us to improve the App and Our Sites.

5. HOW WE USE YOUR PERSONAL DATA

5.1. Most commonly we will use your personal data in the following circumstances:

- Where you have consented before the processing.
- Where we need to perform a contract, we are about to enter or have entered with you.
- 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.
- Where we need to comply with a legal or regulatory obligation.

5.2. We will only send you direct marketing communications by email or text if we have your consent. You have the right to withdraw that consent or at any time by contacting us.

6. PURPOSES FOR WHICH WE USE YOUR PERSONAL DATA

6.1. HISA uses your personal data for purposes including:

1. Installing the App and to register you as a new user
2. To process in-app purchases and deliver Services including managing payments and collecting monies owed to us
3. Updating and enhancing Hisa's records
4. Processing your instructions
5. Conducting and improving our businesses and improving your experience with us
6. To enable you participate in prize draws, competition or complete a survey
7. Establishing your identity and assessing applications for our products and services
8. Pricing and designing our products and services
9. Administering our products and services to you
10. Managing our relationship with you
11. Managing our risks
12. Identifying and investigating illegal activity i.e. such as fraud
13. Contacting you, for example in instances where we suspect fraud on your account
14. Preventing money laundering or terrorism financing activities.
15. Complying with our legal obligations and assisting government and law enforcement agencies or regulators/supervisors
16. Identifying and informing you about other products or services that we think may be of interest to you.
17. Processing your job application if you apply for a job with us
18. To monitor trends so that we can improve the App

6.2. We may also collect, use and exchange your information in other ways permitted by law.

7. DISCLOSURES OF YOUR PERSONAL DATA

When you consent to providing us with your personal data, we may share your information, to the extent permissible by law and at all times in accordance with the Data Protection Act with internal and external third parties as detailed below.



You may contact us for a detailed list of third parties with whom we may share your personal data with.

8. INTERNATIONAL TRANSFERS

- 8.1. In certain instances, we may transfer your data outside of Kenya as some of our external third parties are based outside of Kenya, so their processing of your personal data will involve a transfer of data outside Kenya.
- 8.2. Where we send your information outside Kenya, we will make sure that your information is properly protected and transferred in accordance with the relevant data protection laws.
- 8.3. Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of Kenya in accordance with data laws.

9. DATA SECURITY

- 9.1. We have put in place technologies, processes, tools and necessary measures to enhance Data security. All information you provide to us is stored on our secure servers. Any payment transactions carried out by us or our chosen third-party provider of payment processing services will be encrypted using various technologies. Where we have given you (or where you have chosen) a password that enables you to access certain parts of Our Sites, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.
- 9.2. Once we have received your information, we will use strict procedures and security features to try to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way.
- 9.3. We will collect and store personal data on your Device using application data caches and browser web storage and other technology.
- 9.4. Certain Services include social networking, chat room or forum features. Ensure when using these features that you do not submit any personal data that you do not want to be seen, collected or used by other users.
- 9.5. We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator when we are legally required to do so.

10. DATA RETENTION

- 10.1. We will retain your personal data only for as long as may be reasonably necessary to satisfy the purpose for which it is processed, including for purposes for ensuring compliance with any legal, regulatory, tax, accounting or reporting requirements.
- 10.2. In some circumstances you can ask us to delete your data as highlighted in this statement.
- 10.3. In some circumstances we will anonymise or pseudonymise 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.
- 10.4. Data which is not retained is securely destroyed when it is identified that it is no longer needed for the purposes for which it was collected.

11. YOUR RIGHTS

11.1. Under certain circumstances you have the following rights under data protection laws in relation to your personal data. These include:

- **Request access to your personal data.** You have the right to learn or obtain disclosure on certain aspects where their data is being processed.
- **Request correction of your personal data.** You have the right to verify and seek rectification of your data and ask for it to be updated or corrected. To update your information, go [here](#).
- **Request erasure of your personal data.** You have the right, under certain circumstances, to request erasure of your personal data.
- **Object to processing of your personal data.** You have the right, under certain circumstances to object to the processing of your data if the said processing is carried out on a legal basis other than consent. Where such personal data is required to be processed as a consequence of pursuing legitimate interests of the company as a matter of public interest; you may object by providing a ground related to their particular situation to justify the objection. However, if your data is utilised for direct marketing and advertising purposes, you may object at any time without providing any justification.
- **Request restriction of processing your personal data.** You have the right, under certain circumstances, to restrict the processing of your data and in such an instance your data will not be processed for any other reason other than storing it.
- **Request transfer or your personal data.** You have a right to receive your data in a structured, commonly used and machine-readable format. You have the right to transmit the data to another data controller. Where technically feasible, the data can be transmitted to another controller without any hindrance.
- **Right to withdraw consent.** You have the right to withdraw consent where you previously given your consent to the processing of your personal data. Note that the withdrawal will not affect the lawfulness of any processing carried out before you withdraw your consent.

11.2. You also have the right to ask us not to continue to process your personal data for marketing purposes.

You can exercise any of these rights at any time by contacting us at info@hisa.co.

THIRD PARTIES

Third parties may include:

- Internal third parties such as Employees, independent contractors, subsidiaries, affiliates, consultants, business associates, service providers, suppliers and agents, acting on our behalf for any of the identified purposes. We also provide information to representatives and advisors, including attorneys and accountants, to help us comply with legal, accounting, or security requirements.
- external third parties, Service providers acting as processors or otherwise who provide IT and system administration services.
- professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services.
- regulators and other authorities acting as processors or joint controllers based who require reporting of processing activities in certain circumstances.

12. NON-COMPLIANCE WITH THIS STATEMENT

We shall have the right to terminate any agreement with you for non-adherence to provisions of this statement and reject any application for information contrary to this statement.

13. FURTHER INFORMATION ABOUT PERSONAL DATA

This application may send push notifications to the user.