

PRIVACY STATEMENT OF TRUSTGRO SCA LIMITED T/A FIN

TRUSTGRO SCA LIMITED T/A Fin endeavours to treat all your personal information carefully and responsibly.

This Privacy Statement relates to the collection, use and disclosure of personal data, including special or sensitive personal data, by TRUSTGRO SCA LIMITED T/A FIN. Personal Data is information relating to an individual (“you” or “your”).

1. The Personal Data we may hold includes any information that lets TRUSTGRO SCA LIMITED T/A FIN identify you as a unique individual, such as your name/s and surname combined with your identity/passport number, KRA PIN, physical address and, in the case of a company, information that uniquely identifies the legal entity such as the registered company name together with the company number. This may also include data pertaining to natural persons collected from time to time, including belief, biometric data, property details, marital status, voice, family details including, where applicable, the names of your spouse or spouses, children and your sex, and political opinions or trade union membership where you have shared these with us.
2. Processing of personal data includes any initial processing that TRUSTGRO SCA LIMITED T/A FIN does when we first collect your personal information. It also includes any further and ongoing processing that TRUSTGRO SCA LIMITED T/A FIN is allowed to carry out legitimately in terms of the reasons provided herein. The term ‘processing’ includes collecting, recording, organizing, structuring, storage, adaptation, alteration, retrieval, consultation or use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.
3. We generally do not collect your personal data unless you provide it voluntarily or through your authorized representative as part of a written application form, electronically (email), telephonically, the TRUSTGRO SCA LIMITED T/A FIN website or via the TRUSTGRO SCA LIMITED T/A FIN USSD code or WhatsApp channel, TrustGro Apps pursuant to the specific terms and conditions, or our legitimate social media platforms. We obtain your consent for the processing of your personal data. We may however collect and process your data without your consent where permitted under the Data Protection Act, 2019 or other applicable law.

YOUR RIGHTS

4. In line with the Data Protection Act 2019 and other applicable law, regulation and industry guidelines, you have the following rights regarding your personal data:
 - i. Access -To request a copy of the personal data processed in relation to you by filling in a request form at your Branch and/or through the website and other available virtual channels. TRUSTGRO SCA LIMITED T/A FIN will comply with your request within Seven (7) days and shall not charge any fee for this.
 - ii. Correction -To request that we correct your personal data. You can do this at your branch or through your relationship manager/officer and we will correct your personal data within Fourteen (14) days of your request where we are satisfied that the correction is necessary. If we decline your request, we will tell you in writing, with reasons, within Seven (7) days. There will be no charge for undertaking rectification.
 - iii. Erasure -To ask us to delete your personal data, for example if we no longer have a valid reason to process it. We will respond to your request within Fourteen (14) days, and you will not be charged for this. We may decline your request obligations if necessary for TRUSTGRO SCA LIMITED T/A FIN to

keep data to comply with legal obligation, to establish, exercise or defend a legal claim, or for other reason permitted by law, in which case we will explain why.

- iv. Object -To object to the processing of your personal data. TRUSTGRO SCA LIMITED T/A FIN may continue to process your data where we can demonstrate a compelling legitimate interest that overrides your interests, or where it is needed to establish, exercise or defend a legal claim. We will respond to your objection within Fourteen (14) days, free of charge. If we decline, we will tell you why and of your right to complain to the Office of the Data Protection Commissioner. Your right to object to direct marketing (including related profiling) is absolute: if you object, we will stop using your data for that purpose. We may not be able to offer you services if you object to processing, we consider necessary to provide them.
- v. Restriction -At your request, to restrict how your personal data is processed in certain cases, such as where the accuracy of your Personal Data is contested, the personal data is no longer required, the processing is unlawful and you have opposed it, or where you are awaiting verification of the legitimacy of the personal data. We will act on your request within Fourteen (14) days, free of charge, and will notify any relevant third party with whom the data has been shared. If we decline, we will notify you in writing, with reasons, within Fourteen (14) days.
- vi. Portability -To request a copy of the personal data you have given to us in a machine-readable format. We will comply within thirty (30) days of your request and may charge a reasonable fee that does not exceed the cost of acting on it. For complex or numerous requests, this period may be extended in consultation with the Office of the Data Protection Commissioner. If we decline, we will tell you in writing, with reasons, within Seven (7) days.
- vii. Withdraw Consent – To Withdraw your consent at any time, as described under “Consent” below.
- viii. Be Informed – To be told how your personal data is used and with whom it is shared, as out in this statement.
- ix. Automated Decisions – Not to be subject to a decision solely based on automated processing, including profiling, that produces legal effects concerning you or significantly affects you, except where the decision is necessary for entering into or performing a contract with you is authorized by law, or is based on your consent. In such cases, you may request us to reconsider the decision or take a new decision that is not solely based on automated processing, as described under “Automated Decisions and Profiling” below.
- x. Stop Third-Party Marketing – To ask us to stop using or disclosing you’re your personal data to third party to facilitate direct marketing. We will act on your request within Seven (7) days, free of charge.
- xi. Complain to the Regulator -To lodge a complaint directly with the Office of the Data Protection Commissioner (ODPC) if you believe your personal data has been processed unlawfully, in addition to (or instead of) raising the matter with us directly. ODPC contact details are available at www.odpc.go.ke. You may raise your complaint orally or in writing, and ODPC is required to investigate and conclude a complaint within ninety (90) days.

PROCESSING YOUR PERSONAL DATA

- 5. TRUSTGRO SCA LIMITED T/A FIN will only collect and process your personal information for the reason you provided it to us with your consent, or to enable us to comply with the requirements of specific laws that we are governed by, either directly from you or third-party sources which may include but are not limited to:
 - i. Public records,

- ii. Places where you may already have made your personal information public (for example, on social media),
- iii. Credit reference bureaus; or
- iv. Individuals/directors whom you have appointed as your representative, where you are a corporate entity.
- v. Government databases.

TRUSTGRO SCA LIMITED T/A FIN will only collect your personal information from other sources where we are legally entitled or obliged to do so, and you are entitled to ask TRUSTGRO SCA LIMITED T/A FIN which sources were used to collect your personal information. Where we collect your personal information from a source other than you, we will tell you within fourteen (14) days of collecting it.

- 6. TRUSTGRO SCA LIMITED T/A FIN shall require that mandatory fields for personal data be accurately completed for TRUSTGRO SCA LIMITED T/A FIN to provide you with your chosen product and/or service. If TRUSTGRO SCA LIMITED T/A FIN does not receive the necessary personal information, we will not be able to continue with your application. During your relationship with us, TRUSTGRO SCA LIMITED T/A FIN may request additional personal data pursuant to a law or regulatory guideline; if you do not provide it, TRUSTGRO SCA LIMITED T/A FIN may have to suspend the provision of the product and/or service for a period of time or, as the case may be, terminate our relationship with you.
- 7. TRUSTGRO SCA LIMITED T/A FIN may process your personal information to protect your or our legitimate interests. TRUSTGRO SCA LIMITED T/A FIN will not collect and process personal information about you that we do not need for this purpose. The general purposes for which TRUSTGRO SCA LIMITED T/A FIN collects and processes your personal information include, but are not limited to:
 - i. Creating your record on our system to verify your identity, as well as next of kin and other details pertaining to you;
 - ii. Providing you with the products and/or services you have applied for and communicating with and keeping you informed about these products and/or services;
 - iii. Further processing for historical, statistical or research purposes where the outcomes will not be published in an identifiable format;
 - iv. Processing applications for products and services, effecting payments and transactions, and completing instructions or requests;
 - v. Assessing suitability for products and services;
 - vi. Assessing your creditworthiness, including conducting credit checks and setting credit limits, which may include limited automated scoring as described under "Automated Decisions and Profiling" below;
 - vii. Carrying out operational purposes;
 - viii. Providing income tax-related information to tax authorities as may be required under relevant laws or regulations;
 - ix. Establishment, continuation and management of account relationships;
 - x. Assessing whether you qualify for credit, or an increase or decrease of your credit limit;
 - xi. Identifying you and verifying your physical address, source of income and similar information;
 - xii. Assessing your personal financial circumstances and needs before providing advice to you;

- xiii. Any purpose related to the prevention of financial crime, including sanctions screening and monitoring for anti-money laundering and terrorist financing, which may include limited automated flagging as described under "Automated Decisions and Profiling" below;
- xiv. Sending you marketing information about our goods or services, including marketing events, initiatives, promotions, lucky draws, membership and rewards schemes and other promotions where you have consented or otherwise permitted by law (you may opt out at any time from of charge;
- xv. Where you have been identified as a next of kin by an employee or customer, creating a record of you on our system.

TRUSTGRO SCA LIMITED T/A FIN may have a legal or regulatory obligation to process your Personal Data in connection with the products and services you have requested. These obligations include:

- i. Identity verification, government sanctions screening and due diligence checks;
- ii. Compliance with local or foreign law, authority or regulator directives, enforcement agency regulations, directives, judgments or court orders, government sanctions or embargoes, reporting requirements under financial transactions legislation, and demands of any authority, regulator, tribunal, enforcement agency or exchange body.

We may also process your Personal Data where it is in our legitimate interests to seek professional advice, including in connection with any legal proceedings (including prospective legal proceedings), for obtaining legal advice or for establishing, exercising or defending legal rights.

CONSENT

- 8. The consent that you provide for the processing of your data shall remain valid until it is withdrawn by you in writing and delivered to your nearest TRUSTGRO SCA LIMITED T/A FIN branch or via email to our Call centre Desk through the contact details provided below or through the channel through which you gave it. We shall attend to your request within a reasonable time depending on the complexity of the request and its impact on our relationship, and in general shall seek to process your request within seven (7) days of receiving it.

A withdrawal of consent shall not affect the lawfulness of processing of your personal data based on prior consent before its withdrawal.

Your withdrawal of consent does not affect our right to continue to collect, use and disclose personal data where such collection, use and disclosure without consent is permitted or required under applicable law.

RETENTION OF YOUR PERSONAL DATA

- 9. We retain your personal data in line with our legal and regulatory obligations and for business and operational purposes. As a general rule, this will be for a period of seven (7) years from the end of your relationship with us, save that:
 - iii. Records required for anti-money laundering, tax or regulatory purposes may be retained for the specific period prescribed by the applicable law, even where this exceeds seven (7) years;
 - iv. Marketing consent data will be retained only for as long as your consent remains valid, or until you object, whichever is earlier;

- v. Data collected for a specific application that does not proceed to a customer relationship will ordinarily be retained for no longer than is necessary for that application, in line with our retention schedule.

PROTECTION OF PERSONAL DATA

- 10. To safeguard your personal data from unauthorized access, collection, use, disclosure, copying, modification, disposal or similar risks, we have introduced appropriate administrative, physical and technical measures, such as up-to-date antivirus protection, encryption and the use of privacy filters, to secure all storage and transmission of personal data by us, and we disclose personal data both internally and to our authorized third-party service providers and agents only on a need-to-know basis.

You should be aware, however, that no method of transmission over the Internet or method of electronic storage is completely secure. While security cannot be guaranteed, we strive to protect the security of your information and are constantly reviewing and enhancing our information security measures.

DATA BREACH NOTIFICATION

- 11. Where your personal data is accessed or acquired by unauthorized person and there is likely to result in a real risk of harm to you, TRUSTGRO SCA LIMITED T/A FIN will notify the Office of the Data Protection Commissioner within seventy-two (72) hours of becoming aware of the breach, in line with the Data Protection Act, 2019, and will notify you without undue delay where the breach poses a real risk to your rights and freedoms.
- 12. Any notification to you will describe, as far as reasonably possible, the nature of the breach, the personal data affected, the measures taken or proposed to address it, and steps you can take to protect yourself.
- 13. Where TRUSTGRO SCA LIMITED T/A FIN is designated as an operator of critical information infrastructure, a shorter notification window may apply in line with applicable cybersecurity regulations.

AUTOMATED DECISIONS AND PROFILING

- 14. TRUSTGRO SCA LIMITED T/A FIN makes minimal use of automated processing. As a rule, we do not make decisions based solely on automated processing, as defined in the Data Protection Act 2019, to establish and implement the business relationship with you. Where limited automated processing is used, it is currently confined to:
 - i. Automated thresholds within our credit scoring and lending decision tools, which support but do not replace human review of your application;
 - ii. Automated flagging rules within our anti-money laundering and fraud-monitoring systems;
 - iii. Basic automated handling of routine queries received through our digital and USSD channels.

We may also use profiling, including behavioural analysis, to assist us in providing you with better services, making decisions, and preventing money laundering, terrorism, fraud and other financial crime. Where any tool listed above, or any future automated or AI-assisted tool, is provided by a third party, that vendor is subject to due-diligence and written contractual-safeguards, including data protection and confidentiality obligations and, where data leaves Kenya, the safeguards described under "Cross-Border Transfer of Personal Data" below.

If we use any procedure that results in an automated decision relating to you, we will notify you in writing as soon as reasonably practicable, and you will have the right to obtain human intervention, express your point

of view, discuss the decision with us, and ask us to reconsider it or take a new decision that is not based solely on automated processing. We will respond to your request in writing within a reasonable period, explaining the steps we have taken and the outcome.

DISCLOSURE OF PERSONAL DATA

15. When using your data for the purposes described above, we may need to disclose it to TRUSTGRO SCA LIMITED T/A FIN group companies and to our agents, advisors, funders and third-party service providers ("Other Parties"). Where an Other Party independently determines the purpose and means of processing your data (for example, a funder using your data for its own portfolio, reporting or impact-assessment purposes), that Other Party acts as a separate data controller and is responsible for its own compliance with applicable data protection law, in addition to TrustGro's own obligations to disclose lawfully. Where an Other Party processes your data solely on our instructions, we require them to handle your information using the same level of care that we apply, and to only use it according to our instructions and directions.

We will not otherwise disclose your information to third parties unless we have your permission, or we are under a legal or similar obligation.

Your information may be disclosed to:

- i. Any member of TrustGro SCA Limited, including any officer, employee, agent or director, subject to the safeguards described under "Cross-Border Transfer of Personal Data" below where the recipient is located outside Kenya;
- ii. Regulators, supervisors, governments or quasi-governmental authorities in countries where we, our agents, advisors or third-party service providers have a presence;
- iii. Professional advisors, including auditors and advocates, agents, advisors or third-party service providers under a duty of confidentiality to TrustGro SCA Limited;
- iv. Credit reference, debt collection, anti-money laundering and fraud prevention agencies (where necessary for the purposes described above);
- v. Funders and investors, for portfolio management, reporting, audit and impact-assessment purposes connected to the financing of our lending activities, subject to the safeguards described under "Cross-Border Transfer of Personal Data" below;
- vi. Upon your death or mental incapacity, your legal representative and their legal advisers, and a member of your immediate family for the purpose of allowing him/her to transact in respect of your loan account;
- vii. Any person to whom disclosure is allowed or required by local or foreign law, regulation or any other applicable instrument;
- viii. Any court, tribunal, regulator, enforcement agency, exchange body, tax authority or any other authority (including any authority investigating an offence) or their agents;
- ix. Any person authorised to operate your account and to act on your behalf in giving instructions, to perform any other acts under our product agreement or use any product;
- x. Any actual or potential participant or sub-participant in relation to any of our obligations in respect of any product agreement, assignee or transferee (or any officer, employee, agent or adviser of any of them), located in any jurisdiction, subject to the safeguards described under "Cross-Border Transfer of Personal Data" below.

CROSS-BORDER TRANSFER OF PERSONAL DATA

16. TRUSTGRO SCA LIMITED T/A FIN hosts its core systems locally in Kenya. However, some of your personal data may still be transferred outside Kenya indirectly -for example, where it is shared with a funder, investor, group affiliate or third-party service provider (such as a cloud, communications or technology vendor) that stores or processes data outside Kenya, or through a sub-processor engaged by such a party.
17. Where this occurs, TRUSTGRO SCA LIMITED T/A FIN will only permit the transfer where the destination country has been assessed as offering adequate data protection, or where appropriate safeguards are in place, such as contractual clauses requiring the recipient to protect your data to a standard consistent with the Data Protection Act, 2019, encryption in transit, and restrictions on further onward transfer. Where the data is sensitive personal data, we will transfer it outside Kenya only with your consent and after ascertaining that appropriate safeguards are in place.
18. TRUSTGRO SCA LIMITED T/A FIN maintains a record of the funders and third-party service providers with whom personal data may be shared cross-border, the categories of data involved, and the safeguards applied. You may request general information on the countries to which your data may be transferred by contacting us using the details under "Contact Details" below.
19. TRUSTGRO SCA LIMITED T/A FIN will align its cross-border transfer practices with the Data Protection Act, 2019, the Data Protection (General) Regulations, 2021 and guidance issued by the Office of the Data Protection Commissioner on this subject, including its cross-border transfer guidance.

DATA PROTECTION OFFICE

20. TRUSTGRO SCA LIMITED T/A FIN has designated a Data Protection Office responsible for overseeing compliance with this Privacy Statement and applicable data protection law, including receiving and coordinating your access, correction, erasure, restriction, objection and portability requests, advising on data protection matters (including automated processing and cross-border transfers), and acting as your point of contact on data protection matters.
21. The Data Protection Office may be reached at dpo@fin.africa or at your nearest branch. Its composition may change from time to time as TRUSTGRO SCA LIMITED T/A FIN's structure evolves; this Statement refers to the function rather than any specific individual.

OTHER TERMS AND CONDITIONS

22. There may be specific terms and conditions in our product agreements that govern the collection, use and disclosure of your personal data. Such other terms and conditions must be read in conjunction with this Privacy Statement.

CONTACT DETAILS

23. You may contact our Call centre team, or the Data Protection Office described under "Data Protection Office" above, if you have any enquiries, feedback or complaints in relation to the processing of your personal data, or if you wish to make any request, using the contact details below.

TRUSTGRO SCA LIMITED Head office: 1st Floor, Avocado Towers, Muthithi Road, Westlands

Postal address: 5483-00100, GPO Nairobi

Call Centre contacts

Email: keinfo@fin.africa

Phone: 0111149714

Data Protection Office Contacts

Email: dpo@fin.africa

Contractual Matters

Email for all contractual and/or legal matters: legal.ke@fin.africa

CHANGES TO THIS PRIVACY POLICY STATEMENT

24. This Privacy Policy Statement may be updated from time to time, and you are advised to visit this site regularly to check for any amendments. This policy was last updated on 22nd October 2026.