

Privacy Policy

How Pamoja collects, uses, protects and shares information

Effective Date	12 August 2026
Last Updated	4 September 2026

1. About this Privacy Policy

This Privacy Policy explains how Pamoja collects, uses, stores, protects and shares personal information when you use the Pamoja mobile application, web portal, USSD services, websites and related services (together, the “Pamoja Services”). Pamoja is operated by Impact Microfinance Limited (“Impact Microfinance”, “we”, “us” or “our”).

We are committed to handling personal data responsibly and in accordance with applicable laws and regulatory requirements in Tanzania, including the Personal Data Protection Act, 2022 and applicable regulations, as well as relevant financial-sector, communications and consumer-protection requirements. Where Pamoja is made available outside Tanzania, we will also comply with mandatory data-protection requirements applicable to the relevant processing and services.

2. Information We Collect

2.1 Personal and identity information

- Name, mobile number, email address, date of birth, gender, address and other contact details.
- Identification and verification information required for onboarding, KYC, account security or regulatory compliance.
- Login credentials, user ID, authentication information and one-time-password verification records.

2.2 Community, group and organization information

- Membership details, group or branch affiliation, roles, leadership positions and permissions.
- Meeting attendance, voting, approvals, governance actions, fees, fines and other community records.
- Information submitted by authorized group executives, partner organizations or administrators.

2.3 Financial and transaction information

- Contributions, savings, shares, loans, repayments, balances, fees and related transaction records.
- Payment references and information received from mobile money providers, payment aggregators, banks or other regulated financial-service providers.
- Information used to assess eligibility, affordability, authorization, reconciliation, fraud prevention or compliance where applicable.

2.4 Technical and usage information

- Device, browser, operating system, IP address, session and security information.
- App, web and USSD usage data, system logs, timestamps, error records and audit trails.
- Communications with Pamoja support and feedback you provide.

3. How We Use Information

- Create, verify, administer and secure user, group and organization accounts.
- Enable member onboarding, contributions, savings, shares, loans, meetings, voting, approvals, reporting and other Pamoja functions.
- Process or facilitate transactions and integrations with authorized payment and financial-service providers.

- Send service notifications, security alerts, transaction confirmations and operational communications.
- Provide customer support, investigate complaints and resolve account or transaction issues.
- Maintain audit trails, prevent fraud and misuse, manage risk and protect users and the Pamoja Services.
- Improve functionality, reliability, accessibility and user experience.
- Comply with legal, regulatory, tax, accounting, reporting and law-enforcement obligations.

4. Legal and Operational Basis for Processing

We process personal data where it is necessary to provide the Pamoja Services, perform contractual or operational obligations, comply with law and regulation, protect legitimate interests and security, or where consent is required and has been obtained. Where a community, organization or partner submits information about its members, it is responsible for having the authority and appropriate basis to provide that information to Pamoja.

5. How We Share Information

We do not sell personal data. We may share information only where reasonably necessary, including with:

- Authorized group or organization leaders, approvers and administrators according to their roles and permissions.
- Impact Microfinance and authorized personnel who require access to operate, support, secure or administer Pamoja.
- Mobile money operators, payment aggregators, banks, regulated financial institutions and other service providers needed to deliver transactions or integrated services.
- Technology, hosting, communications, security, analytics and professional service providers acting under appropriate confidentiality and data-protection obligations.
- Government, regulatory, supervisory, judicial or law-enforcement authorities where disclosure is required or permitted by law.
- Business partners where a specific service is delivered jointly and appropriate data-protection arrangements are in place.

6. Financial Services and Third-Party Providers

Pamoja may connect users and communities to payment, banking, lending or other financial services provided by Impact Microfinance or third parties. Those providers may collect and process information under their own legal and regulatory obligations and privacy notices. Pamoja does not control the independent processing activities of third-party providers.

7. Data Security

We use reasonable administrative, technical and organizational safeguards designed to protect personal data against unauthorized access, loss, alteration, misuse or disclosure. These measures may include access controls, authentication, encryption where appropriate, secure infrastructure, monitoring, audit trails, backups and role-based permissions. No system can guarantee absolute security, and users must also protect their credentials and devices.

8. Data Retention

We retain personal data for as long as necessary to provide the Pamoja Services, maintain accurate community and financial records, resolve disputes, prevent fraud, enforce agreements and meet legal, regulatory, accounting and audit obligations. Retention periods may differ depending on the type of information and applicable requirements. Information may be securely deleted, anonymized or archived when it is no longer required.

9. International Data Processing

Pamoja may use technology or service providers whose infrastructure or personnel are located outside Tanzania. Where personal data is transferred or accessed across borders, we will do so in accordance with applicable law and regulatory requirements, including obtaining any required authorization or permit and applying appropriate contractual, technical and organizational safeguards. We will take reasonable steps to ensure that transferred personal data remains protected and is used only for authorized purposes.

10. Your Rights and Choices

Subject to applicable law and verification of your identity, you may have rights in relation to your personal data, including the rights listed below.

- Request access to personal data held about you.
- Request correction of inaccurate or incomplete information.
- Request deletion or restriction where legally applicable.
- Object to or withdraw consent for certain processing where consent is the applicable basis.
- Raise a complaint or request information about how your data is handled.
- Request data portability where applicable.
- Object to certain processing, including direct marketing where applicable.
- Request appropriate review of decisions based solely on automated processing where applicable.

Some information cannot be deleted immediately where it must be retained for legal, regulatory, financial-record, fraud-prevention or dispute-resolution purposes.

11. Where Personal Data May Be Held

- Personal data may be stored or processed on secure infrastructure operated by Pamoja, Impact Microfinance or authorized service providers, including approved cloud or data-centre environments in Tanzania or other permitted locations. Access is restricted according to role and business need.

12. Automated Decision-Making and Profiling

- Pamoja may use data-supported rules or assessments for functions such as eligibility, affordability, fraud prevention, security or risk management. Where a decision is made solely by automated means and produces legal or similarly significant effects, we will provide the protections and opportunities for review required by applicable law.

13. Children's Information

Pamoja is designed primarily for adults and authorized members of community and member-based organizations. We do not knowingly collect personal data directly from children unless this is permitted by law and appropriate authorization or consent has been obtained. If you believe information about a child has been provided improperly, please contact us.

14. Cookies and Similar Technologies

Our web services may use cookies, local storage or similar technologies that are necessary for authentication, security, preferences, performance and service operation. Where required, additional choices or notices will be provided.

15. Changes to this Privacy Policy

We may update this Privacy Policy to reflect changes in the Pamoja Services, law, regulation or our practices. The revised policy will show an updated “Last Updated” date. Material changes may also be communicated through the Pamoja Services or other appropriate channels.

16. Contact Us

For privacy questions, requests or complaints relating to Pamoja, contact:
Pamoja / Impact Microfinance Limited
Email: pamoja@impactmicrofinance.com
Dar es Salaam, Tanzania

You may also lodge a complaint with the Personal Data Protection Commission (PDPC) or another competent data-protection authority where applicable.

17. Governing Framework

This Privacy Policy is governed by and interpreted in accordance with applicable laws of the United Republic of Tanzania. Where mandatory privacy or data-protection laws in another jurisdiction apply to particular users or processing activities, those requirements will also be respected. Nothing in this Policy limits any rights or remedies available to a data subject under applicable law.