



Harambee DT Sacco Society
Data Privacy Policy

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1. Introduction

Harambee DT Sacco Limited ('us', 'we' or 'our') is a Sacco regulated by SASRA to offer financial services. We operate the www.harambee.com website, which provides more information of us and our various services/facilities as well as the **Mcash** mobile application. As an organization, we take our responsibility regarding the management of our stakeholders' data very seriously. This document informs you of our policy regarding the collection, use and disclosure of personal data when you use our services. It sets out how we manage our responsibility in the use of your data and the choices you have associated with that data. This data policy is in compliance with the Data Protection Act 2019.

2. Definitions

'You' means.

- i. A member of Harambee Sacco.
- ii. Any agent, dealer and/or merchants who has signed an agreement with us and is recognized as a merchant or agent in accordance with any applicable laws or Regulations.
- iii. Any visitor that is a person (including contractors/subcontractors or any third parties) who gains access to any Harambee Sacco premises.
- iv. Any supplier who has been contracted by Harambee Sacco and executed a Supplier contract.

Data controller: means a natural or legal person, public authority, agency, or other body which, alone or jointly with others, determines the purpose and means of processing of personal data

Data processor: means a natural or legal person, public authority, agency, or other body which processes personal data on behalf of the data controller

Data subject: means an identified or identifiable natural person who is the subject of personal data

Personal data; means any information relating to an identified or identifiable natural person

'Harambee', 'us', 'we', 'our' or 'ours' means Harambee DT Sacco Limited.

3. Legal Basis/Lawful purposes Data Collection

- i. All data processed by the SACCO will be done on one of the following lawful bases: consent, contract, legal obligation, vital interests, public task, or legitimate interests
- ii. Where consent is relied upon as a lawful basis for processing data, evidence of opt-in consent shall be kept with the corresponding personal data.
- iii. Where communications are sent to individuals based on their consent, the option for the individual to revoke their consent should be clearly available and systems shall be in place to ensure such revocation is reflected accurately in Harambee SACCO systems.

4. Data Collection

We collect your personal information during the following instances (this list may not be exhaustive)

- i. When you join the Sacco and fill a membership form.
- ii. When you apply for a loan.
- iii. Register for a specific product or service offered by Harambee Sacco, including but not limited to; Mcash, Atm cards, Salary agreement, Toto junior or any other Harambee Sacco product
- iv. Ask Harambee Sacco for more information about a product or service or contact the Sacco with a query or complaint.
- v. Respond to or participate in a survey, marketing promotion, prize competition or special offer.
- vi. We may also collect your information from other organizations including credit-reference bureaus, fraud prevention agencies and business directories.
- vii. We may collect your information when you interact with us as a supplier, agent, merchant or dealer.
- viii. Job applications and interviews.
- ix. We also collect information when you visit any of our premises, website, mobile application, and other digital platforms

5. What information is collected

The information we collect and store about you includes but is not limited to the following:

- i. Name, I.D./Passport Number, Personal number Photograph, Date of Birth, Gender, Marital Status, Next of Kin details, Biometric Data, Property Details, Postal Address, Telephone Number.
- ii. Your transaction information.
- iii. Salary details.
- iv. Closed Circuit Television (CCTV) surveillance recordings. CCTV Devices are installed at strategic locations to provide a safe and secure environment in all Harambee Sacco premises.
- v. We maintain a register of visitors in which we collect and keep your personal data such as name, company/institution details, telephone number, vehicle registration details and National ID number. This information is collected for health, safety, and security purposes.

6. Use of Information

Some of the purposes for which we collect and process your data includes (this list may not be exhaustive):

- i. To provide and maintain our Service.
- ii. To notify you about changes to our Service.
- iii. To allow you to participate in interactive features of our Service when you choose to do so.

- iv. To provide member support.
- v. To gather analysis or valuable information so that we can improve our Service.
- vi. To monitor the usage of our Service
- vii. To detect, prevent and address technical issues and/ fraud
- viii. To provide you with news, special offers and general information about other goods, services and events which we offer that are similar to those that you have already purchased or enquired about unless you have opted not to receive such information.

7. Disclosure of Information

Harambee Sacco Limited may disclose your Personal Data to 3rd Parties in the good faith belief that such action is necessary but not limited to:-

- i. To comply with a legal obligation.
- ii. To protect and defend the rights or property of Harambee DT Sacco Limited.
- iii. To prevent or investigate possible wrongdoing in connection with the Service.
- iv. To protect the personal safety of users of the Service or the public.
- v. To protect the Sacco against legal liability.
- vi. To service providers contracted to improve the customer /member experience.

8. Retention of Information

Harambee DT Sacco Limited will retain your Personal Data only for as long as is necessary for the purposes set out in this Data Privacy Policy. We will retain and use your Personal Data to the extent necessary to comply with our legal obligations (for example, if we are required to retain your data to comply with applicable laws), resolve disputes, and enforce our legal agreements and policies.

9. Your data rights

As a Data Subject you have the following Rights as set out in the Data Protection Act No. 24 of 2019:

- i. The right to be informed of the use of your information/data.
- ii. The right to access, update or to delete the information or data in our custody. This right is not absolute and maybe be subject to the nature of the data and other prevailing laws.
- iii. The right of rectification. You have the right to have your information/data rectified or deleted if that information is misleading, inaccurate, or incomplete.
- iv. The right to object. You have the right to object to our processing of your Personal Data.
- v. The right of restriction. You have the right to request that we restrict the processing of your personal information.
- vi. The right to data portability. You have the right to be provided with a copy of the information we have on you in a structured, machine-readable, and commonly used format.

- vii. The right to withdraw consent. You also have the right to withdraw your consent at any time where Harambee DT Sacco Society Limited relied on your consent to process your personal information, without any detriment to your interests.

10. Data minimization

The SACCO shall ensure that personal data are adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.

11. Accuracy

- i. The SACCO shall take reasonable steps to ensure personal data has integrity and is kept accurate.
- ii. Where necessary for the lawful basis on which data is processed, steps shall be put in place to ensure that personal data is kept up to date.

12 Security

- i. The SACCO shall ensure that personal data is stored securely in order to guarantee Confidentiality, Integrity, and Availability of personal data
- ii. Access to personal data shall be limited to personnel who need access and appropriate security shall be in place to avoid unauthorized sharing of information.
- iii. When personal data is deleted, it shall be done safely such that the data is irrecoverable across the data value chain.

13. Data Breach

In the event of a personal data breach leading to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, personal data, the SACCO shall promptly assess the risk to data subjects' rights and freedoms and appropriately report the Data Commissioner as per the provisions of the Data Protection Act.

14. Data Protection Officer Contacts

If you wish to exercise any of the rights set out above, please contact us on either of the following:

The DPO

Harambee Coop Plaza, Haile Selassie Avenue

P.O. Box 47815-00100 Nairobi

Email:logachi@harambeesacco.com

Tel No: 0709943000/0709943100/0709943112

Please note that we may ask you to verify your identity and provide signed instructions before responding to such requests. This is a security measure to ensure that personal data is not disclosed to any person who has no right to access it.

We try to respond to all legitimate requests within reasonable time. Occasionally it could take us longer if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

15. Amendments to this Policy

Harambee DT Sacco may update our Data Privacy Policy from time to time. We will notify you of any changes by posting the new Data Privacy Policy on our website. You can also find the hardcopy document at any of our branches. We will let you know via email and / or a prominent notice on our Service, prior to the change becoming effective and update the “effective date” at the top of this Privacy Policy.

Last updated: 4th Jan 2022

If you have any questions about this Data Privacy Policy, please contact us on **logachi@harambeesacco.com** or **0709943000/0709943100/0709943112**