

## Privacy Policy (PP)

|                |                         |
|----------------|-------------------------|
| Department     | All                     |
| Version        | 1.1                     |
| Classification | Internal & External Use |



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1 | Version Control

| Version | Date       | Author          | Details         | Reviewed & Approved by |
|---------|------------|-----------------|-----------------|------------------------|
| 1.1     | 13.10.2023 | William Mweemba | Initial version | Idreen Malambo         |



**2 | Related Documents**

| Document Name                | Document Location |
|------------------------------|-------------------|
| Data Protection Policy (DPP) |                   |
|                              |                   |
|                              |                   |



Welcome to Madison Finance Company Limited ("we," "us," or "our"). Protecting your privacy and ensuring the security of your personal information is a fundamental commitment we make to you. This Privacy Policy outlines the practices we employ in collecting, using, disclosing, and safeguarding your data when you utilize our Android mobile banking app ("the App"). By using the App, you indicate your consent to the policies outlined below.

### **3 | 1. Information We Collect**

#### **1.1 Personal Information:**

- We may collect personal information, such as your name, address, date of birth, and contact details. This information is used to identify and authenticate you, as well as to provide you with tailored services and support.

#### **1.2 Financial Information:**

- When using the App, financial information may be referenced, including account balances, transaction history, and payment details. This information is crucial for processing financial transactions and ensuring the security of your accounts.

#### **1.3 Device Information:**

- Device-related data, including the type of device you use, your operating system, and unique device identifiers, is collected to optimize the App's compatibility with your device as well as for security purposes.

#### **1.4 Location Information:**

- With your explicit consent, we may collect precise location data to offer location-based services. This information can be beneficial in fraud prevention and personalized service delivery.

#### **1.5 Log Information:**

- We automatically gather information about your use of the App, such as log data and analytics, to monitor and enhance the application's performance, as well as for security and compliance purposes.

### **4 | 2. How We Use Your Information**

#### **2.1 Providing Financial Services:**

- Your data is used to deliver various financial services and transactions through the App. This includes processing deposits, withdrawals, mobile wallet transactions, and fund transfers.

#### **2.2 Enhancing User Experience:**

- We analyze your data to improve user experience and the functionality of our products and services, ensuring that we meet your expectations and preferences.

#### **2.3 Personalization:**

- Your information allows us to tailor the App's features and content to better suit your needs, delivering a personalized and relevant experience.



## **2.4 Security and Fraud Prevention:**

- Data is analysed to monitor user behaviour, detect and prevent fraudulent activities, and enhance the overall security of your accounts.

## **2.5 Compliance with Legal and Regulatory Requirements:**

- We may use your information to fulfil legal obligations and regulatory requirements, such as reporting financial transactions to government authorities.

## **5 | 3. Sharing Your Information**

### **3.1 Third-Party Service Providers:**

- We may share your information with trusted third-party service providers that assist in operating the App. These service providers are bound by strict confidentiality and security obligations.

### **3.2 Affiliates and Partners:**

- We may share your information with our affiliates and partners when it's necessary to provide the services you request, including loans, investment products, or other financial services.

### **3.3 Legal Requests and Protection:**

- In response to legal requests or to protect our rights, safety, and interests, we may share your information with law enforcement agencies, courts, and other government entities.

### **3.4 Business Transitions:**

- In the event of a merger, acquisition, sale, or reorganization of our company, your information may be transferred to the acquiring entity.

## **6 | 4. Data Security**

We are deeply committed to safeguarding your data. While we employ industry-standard security measures to protect your information, please be aware that no method of data transmission over the Internet or electronic storage is completely secure. Therefore, we cannot guarantee absolute security.

## **7 | 5. Your Choices**

You have the following rights:

### **5.1 Access, Correction, and Deletion:**

- You can access, correct, or request the deletion of your personal information by contacting us through the methods provided in the "Contact Us" section.

### **5.2 Opt-Out of Marketing Communications:**

- You have the option to opt out of receiving marketing communications from us by following the provided instructions in such communications.

### **5.3 Withdraw Consent:**



- If you wish to withdraw your consent to data processing, please contact us through the methods outlined in the "Contact Us" section.

#### **8 | 6. Children's Privacy**

Our App is not designed for children under the age of 18, and we do not knowingly collect information from individuals under 18.

#### **9 | 7. Changes to this Policy**

We may periodically update this Privacy Policy. The most current version will be posted on our website and will become effective upon posting.

#### **10 | 8. Contact Us**

If you have any questions or concerns regarding this Privacy Policy, please do not hesitate to reach out to us:

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