

DATA PRIVACY STATEMENT

1. INTRODUCTION

- 1.1 Fanikiwa Microfinance Company Limited (hereinafter referred to as “we” or “us” or “our””) respects your privacy. This data privacy statement explains how we collect, use, disclose and protect your information when you apply for our products and services.
- 1.2 Fanikiwa Microfinance Company Limited is duly registered as a Data Controller with the Personal Data Protection Commission, in compliance with Section 14/21 of the Personal Data Protection Act, No. 11 of 2022, under Registration No. 0-000-001-480. Our appointed Data Protection Office can be reached at:
 - Address: 9th Floor, Faykat Tower, Ali Hassan Mwinyi Road, Dar es Salaam
 - Email: dpo@fmfc.co.tz
 - Phone: +255 746 985 221
 - Postal Address: P.O. Box 57, Dar es Salaam, Tanzania
- 1.3 This statement should be read together with our Terms and Conditions for products and services.
- 1.4 Personal data is information relating to our customer or potential customers (hereafter referred to “you” or “your”)
- 1.5 The data controller of your personal data is Fanikiwa Microfinance Company Limited that you have or may have a relationship with.
- 1.6 This statement applies to all customers, suppliers and all clients who have any business dealings with the company.

2. SCOPE

This Data Privacy Statement applies to all personal information collected, processed and stored by Fanikiwa Microfinance Company Limited during its operations. It covers all processing of personal data within the United Republic of Tanzania and any transfers outside Tanzania as permitted by law.

3. COLLECTION OF INFORMATION

- 3.1 We collect your personal information with your knowledge and consent when you do any of the following (please note that this list is not exhaustive):
 - a) Apply for a product or service
 - b) Request information or contact us with a query or complaint
 - c) Respond to or participate in a survey, marketing promotion, prize competition or special offer
 - d) We may also collect your information from other organizations including credit-reference bureaus, fraud prevention agencies and business directories
 - e) Interact with us as a supplier
 - f) Visit our premises
 - g) Interact with our sales agents

3.2 What Information is Collected

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

- a) **Personal Data:** Demographic and other personally identifiable information such as your name, photograph, address, location, phone number, identity document type and number, date of birth, email address, age and gender
- b) **Financial Information:** Financial information related to your financial status, including bank account numbers, income, bank and M-Pesa statements. Details on your earnings as per your pay slip
- c) **Data from social networks:** When you contact or engage with us, such as by calling, messaging, or interacting with our official social media platforms, we may collect and retain records of these interactions. This may include recordings of phone conversations and content from messages or exchanges made via social media or other communication channels, in accordance with applicable laws.
- d) **Biographical data:** -This includes information about your family history, such as marital status and

family members (next of kin).

- e) **Special Categories (Sensitive) Data:** Where required for the provision of our services, we may collect sensitive data such as biometric data, health information, or information on criminal convictions. We will obtain your explicit consent where the law requires.

3.3 Use of Information

We may use and analyze your information for the following purposes:

- a) Processing applications for products and services, affecting payments, transactions and completing instructions or requests
- b) Responding to any of your queries or concerns
- c) Verifying your identity information through publicly available and/or restricted government databases to comply with applicable regulatory requirements
- d) Assessing suitability for products and services
- e) Carrying out credit checks and credit scoring
- f) Keeping you informed generally about new products and services and contacting you with any new product unless you opt out of receiving such marketing messages (you may contact us at any time to opt out of receiving marketing messages or by sending stop to the number provided in the SMS)
- g) To comply with any legal, governmental or regulatory requirement or for use by our lawyers in connection with any legal proceedings
- h) In business practices including quality control, training and ensuring effective systems operations
- i) To understand how you use our products and services for purposes of developing or improving products and services
- j) Resolve disputes
- k) Preventing and detecting fraud or other crimes and for debt recovery
- l) For research, statistical, survey and other scientific or business purposes
- m) Provide aggregated data (which does not contain any information which may identify you as an individual) to third parties for research and scientific purpose
- n) Administer any of our online platforms/websites.
- o) Any other legitimate use

3.4 Lawful Basis for processing your information

We rely on the lawful bases provided under the Personal Data Protection Act, 2022 including:

- a) The performance of a Product/Service Agreement with you
- b) Fanikiwa Microfinance Company Limited's legitimate business interests
- c) Compliance with a mandatory legal obligation
- d) Consent you provide
- e) Performance of a task carried out in the public interest
- f) Protection of your vital interests

3.5 Retention of Information

We retain personal data only for as long as it is necessary to fulfil the purposes for which it was collected, unless a longer retention period is required or permitted by law. In line with the Microfinance (Non-Deposit Taking Microfinance Service Providers) Regulations, 2019 (GN No. 679), Fanikiwa Microfinance Company Limited is required to maintain proper books of account and client records for a minimum of ten (10) years after the end of the client relationship. Accordingly, we have established retention schedules that map to this ten-year requirement for all client data covered by the regulations. Where a longer retention period is justified—such as for ongoing litigation, tax, or regulatory audits—we will retain the data only for as long as such lawful reasons continue to exist. Once the applicable retention period expires, or the data is no longer needed, it is securely destroyed, deleted or anonymized so that it can no longer be associated with you. You may request details of our retention periods for different categories of data from our Data Protection Office.

4. DISCLOSURE OF INFORMATION

4.1 Any disclosure of your information shall be in accordance with applicable law and regulations. We shall assess and review each application for information and may decline to grant such information to the requesting party.

4.2 We may disclose your information to:

- i. Law-enforcement agencies, regulatory authorities, courts or other statutory authorities in response to a demand issued with the appropriate lawful mandate and where the form and scope of the demand is compliant with the law.
- ii. Third party Service providers: We may share your information with third parties that perform services for us or on our behalf, including credit reference check with duly licensed CRBs, fraud prevention and anti-money laundering agencies and other third-party institutions, payment processing, data analysis, email delivery, hosting services, customer service, and marketing assistance.
- iii. We may share your personal information with other companies within the Platcorp Holdings Limited Group, in which case we will require those companies to honour this Privacy Statement and maintain appropriate safeguards. Any such sharing will be conducted in accordance with this Statement and applicable law. Fanikiwa Microfinance Company Limited itself does not have subsidiaries or joint ventures. However, it belongs to a group of companies under a common parent.
- iv. We may share your information with our business partners to offer you certain products, services or promotions.
- v. Publicly available and/or restricted government databases to verify your identity information to comply with regulatory requirements
- vi. Debt-collection agencies or other debt-recovery organizations
- vii. Survey agencies that conduct surveys on behalf of the company
- viii. Any other person that we deem legitimately necessary to share the data with
- ix. We shall not release any information to any individual or entity that is acting beyond its legal mandate.

4.3 Marketing

We may use your personal data to conduct market research and surveys with the aim of improving our products and services and for marketing purposes, promotional events, competitions and lucky draws. You have full control over whether you receive marketing messages from us. If at any time you no longer wish to receive updates about our products or services opt out at any time through any of the following methods:

- i. Contact our Data Protection Office at dpo@fmfc.co.tz
- ii. Contact our customer care through the number +255 746 985 221 or email info@fmfc.co.tz

5. ACCESS TO AND UPDATING YOUR INFORMATION

If you believe that our records contain inaccurate, misleading, or incomplete personal data relating to you, you have the right to request correction in accordance with the Personal Data Protection Act, No. 11 of 2022.

Data correction request forms are available on our website <https://fanikiwa.co.tz/en/> and may be downloaded, completed, and submitted to any of our branch outlets or emailed directly to our Data Protection Office via our designated data protection email address.

Upon receipt of your request, we may require supporting documentation to verify the accuracy of the information and your identity. We shall take reasonable steps to investigate the request and rectify any inaccurate or incomplete personal data without undue delay, in line with the requirements of the Act.

6. SAFEGUARDING AND PROTECTION OF INFORMATION

We have put in place technical, organizational and operational measures to ensure integrity and confidentiality of your data via controls around: access control, physical and environmental security and monitoring and compliance. While we have taken reasonable steps to secure the personal information you provide to us, please be aware that despite our efforts, no security measures are perfect or impenetrable, and no method of data transmission can be guaranteed against any interception or other type of misuse. Any information disclosed online is vulnerable to interception and misuse by unauthorized parties. Therefore, we cannot guarantee complete security if you provide personal information.

7. YOUR RIGHTS

Subject to legal and contractual exceptions, you have rights under data protection laws in relation to your personal data. These are listed below: -

- a) Right to be informed that we are collecting personal data about you;
- b) Right to access personal data that we hold about you and request for information about how we process it;
- c) Right to request that we correct your personal data where it is inaccurate or incomplete;
- d) Right to request that we erase your personal data noting that we may continue to retain your information if obligated by the law or entitled to do so;
- e) Right to object and withdraw your consent to processing of your personal data. We may continue to process if we have a legitimate or legal reason to do so;
- f) Right to request restricted processing of your personal data noting that we may be entitled or legally obligated to continue processing your data and refuse your request;

If you wish to exercise any of the rights set out above, please contact us on our data protection email at dpo@fmfc.co.tz

8. HOW TO CONTACT US

If you would like to contact us regarding any aspect of this privacy policy, you may do so by emailing our Data Protection Office at dpo@fmfc.co.tz or by submitting a request through any of our digital platforms.

9. RIGHT TO LODGE COMPLAINT

You have the right to lodge a complaint with the relevant supervisory authority that is tasked with personal data protection within the United Republic of Tanzania.

10. AMENDMENTS TO THIS STATEMENT

We reserve the right to amend or modify this statement at any time, and you are advised to visit this site regularly to check for any amendments

28th August 2025

Statement effective date; Version 02

