
PRIVACY NOTICE

Last updated on 19 July 2021

BACKGROUND:

Welcome to the <https://www.mukuru.com/> website (“the/this website” or “Our Site”), home of the Mukuru Money Transfer Service (“Mukuru Service”) and Mukuru VAS in South Africa.

The Mukuru Service was created to help individuals such as yourself to send money to and receive money from family and friends around the world. The Mukuru Service is operated by Remitix Limited in many countries around the world under the trading name of Mukuru® with the assistance of Remitix Affiliates. Remitix Limited's registered address is at 12 Old Mills Industrial Estate, Paulton, Bristol, United Kingdom, BS39 7SU.

A Remitix Affiliate is a subsidiary or a holding company of Remitix Limited or any subsidiary of a holding company of Remitix Limited which is contracted from time to time to register new customers as users of the Mukuru® Service, and/or create orders for money transfer transactions for senders and/or accept payment in settlement of created orders from senders, and/or pay out remittances to recipients on behalf of Remitix Limited.

Mukuru VAS refers to the value-added services provided to Mukuru Customers in certain regions, which includes the Mukuru Wallet and other products and financial services also under the trading name of Mukuru®.

A Mukuru Customer is a person who is a registered user of the Mukuru Service and who may also register as a user of one or more Mukuru VAS.

Under this Privacy Notice Mukuru Services includes the Mukuru Service and Mukuru VAS.

Reference to the Mukuru Group in this Privacy Notice means all subsidiaries of Remitix Limited or its holding company or any other subsidiaries of such holding company or all Entities Controlled¹ by or under the direct or indirect Control of Remitix Limited, its subsidiaries, its holding companies or the subsidiaries of such holding companies.

We understand that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of everyone who visits our website and we will only collect and use personal data in ways that are described here, and in a way that is consistent with our obligations and your rights under the law.

Please read this Privacy Notice carefully and ensure that you understand it. Your acceptance of this Privacy Notice is requested at key points in Mukuru Services.

¹ “Controlled” or “Control” means with respect to the relationship between two or more Entities, means the possession, directly or indirectly by equity ownership, contract or otherwise, of the power to direct the management or policies of the specified Entity. “Entity/ies” means any person, association, business, close corporation, club, company, concern, enterprise, partnership, trust, undertaking, voluntary association or other similar entity, whether corporate or unincorporated.

1. Information About Us

Our Site is owned and operated by Mukuru Africa (Pty) Ltd, a company incorporated under the laws of South Africa with Registration number 2013/003424/07. As an ADLA Category II licence holder, Mukuru Africa is supervised by SARB and regulated by FIC.

Registered address: Mukuru Africa (Pty) Ltd
Suite 20-101A, Building 20
The Waverly Business Park
Wyecroft Road, Mowbray, 7925
Cape Town
South Africa

To contact the Data Protection Officer or Information Officer, please email privacy@mukuru.com marked "Attention DPO". Under this Privacy Notice, please use this email address to contact us.

We are regulated by the Information Regulator in South Africa and the Information Commissioner Officer in the United Kingdom (UK).

Remitix Limited is a regulated Authorised Payment Institution, licensed under Money Transmitter Licence Number 12234310 (issued by Her Majesty's Revenue and Customs) and is registered with the Financial Conduct Authority under Registration Number 576623 in the United Kingdom.

2. What Does This Notice Cover?

This Privacy Notice applies to this website, your access to and/or use of Mukuru Services as well as any other time that you contact us. It applies to all Mukuru's Channels. Mukuru's Channels include Mukuru's websites, mobi, online services such as Facebook Messenger and Facebook, App platforms like WhatsApp and the Customer App, USSD, Email, SMS, our Contact Centre and any publications or newsletters that you request as well as any other channel through which you use Mukuru Services. Mukuru Channels may change from time to time, but any reference to a Mukuru Channel includes such changes.

This Privacy Notice forms part of our agreement with you; read it together with our Terms of Use and other applicable documents referred to. Please note that we have no control over how your data is collected, stored, or used by other websites. Please check the privacy policies of other websites before providing any data to them.

3. What Is Personal Data?

Personal data is any information relating to an identifiable person who can be directly or indirectly identified, in particular by reference to an identifier.

In simpler terms, personal data is any information about you that enables you to be identified. Personal data covers obvious information like your name and contact details, but it also covers less obvious information like identification numbers, electronic location data, and other online identifiers.

4. What Are My Rights?

Under the data protection legislation, you have the following rights (which are detailed throughout this Privacy Notice), which we will always work to uphold:

- a) The right to be informed about our collection and use of your personal data. This Privacy Notice should tell you everything you need to know, but you can always contact us.
- b) The right to access the personal data we hold about you.
- c) The right to have your personal data rectified if any of your personal data we hold is inaccurate or incomplete.
- d) The right to be forgotten, i.e. the right to ask us to delete or otherwise dispose of any of your personal data that we hold.
- e) The right to restrict (i.e. prevent) the processing of your personal data.
- f) The right to object to us using your personal data for a particular purpose or purposes.
- g) The right to withdraw consent. This means that if we are relying on your consent as the legal basis for using your personal data, you are free to withdraw that consent at any time.
- h) The right to data portability, if applicable according to applicable data protection laws. This means that, if you have provided personal data to us directly, we are using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask us for a copy of that personal data to re-use with another service or business in many cases.
- i) Rights relating to automated decision-making and profiling.

For more information about our use of your personal data or exercising your rights as outlined above, please contact us.

It is important that your personal data is kept accurate and up-to-date. If any of the personal data we hold about you changes, please keep us informed for as long as we have that data.

If you have reason to complain about our use of your personal data, you have the right to lodge a complaint with the relevant supervisory authority. We would welcome the opportunity to resolve your concerns ourselves however, so please feel free to contact us first, using the details in Section 1.

5. What Data Do You Collect and How?

Depending on how you use Our Site, we may collect and hold some or all the personal and non-personal data shown in the table below, using the methods also shown in the table. Please note, we may collect data relating to criminal convictions

and/or offences if you are applying for employment with us.

Information You Provide Us With:

Customer (Sender and Policy Holder)

Title	Mobile Number
First Name	Email Address
Second Name	Country of Origin
Surname	Country of Residence
Preferred Name	Address
Age	Proof of Address Image
Date of Birth	Occupation
Gender	Monthly Income
ID Number	Proof of Income Image
ID Document Image	Selfie
Banking Details	Order Purpose
Medical Information (Specific to policy holder - i.e. death certificate)	

Customer (Recipient)

Country	ID Number
First Name	ID Document Image
Second Name	Date of Birth
Surname	Relationship
Mobile Number	Signature (Collection Slip Image)
Gender	City (i.e. Payment Location)

Customer (Policy Holder's Dependent/Beneficiary and Witnessing Family Member)

First Name	Date of Birth
Middle Name	ID / Passport / Birth Certificate Number
Surname	Contact Number

Employment Candidate

First Name	Phone Number
Middle Name	Work History
Surname	Education
Email Address	CV and Cover Letter

Company Information (Legal/Juristic persons)

Company Name	Registration Number
Address	VAT number
Banking details	Telephone number/s
Email Address	Contact Person's name
Director Information	

Information We Collect Automatically:

IP Address	Mukuru Card Details
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Information We Collect from Third-Parties for Customers

Customer (Sender and Recipient) Identity Profile (i.e. sanctions).

A special note about children: Children (minors), as defined by applicable law, may not use Our Site and are not eligible to use the Mukuru Service and should not attempt to supply us with any information. Where we are required to process personal data about children, we will rely on a lawful basis to do so, such as with the consent of a competent person and always, in accordance with applicable law.

Please see Section 12 for reference to our use of Cookies and similar technologies.

6. How Do You Use My Personal Data?

Under the data protection legislation, we must always have a lawful basis for using personal data. The following describes how we may use your personal data, and our lawful bases for doing so:

Provide Product and Service Offerings

To fulfil our contractual obligation to you, we use your personal data to:

- a) _____ provide and deliver Mukuru product and service offerings;
- b) _____ process transactions related to Mukuru product and service offerings;
- c) _____ provide customer support.

Comply with Legal and Regulatory Obligations

To fulfil international and national legal and regulatory requirements, as well as detect and prevent financial and other (i.e. cyber) crime, we use your personal data to:

- a) verify your claimed identity;
- b) screen your identity against third-party databases (i.e. sanctions databases); and
- c) monitor and report your transaction activity to legal and regulatory bodies.

Communicate with You

With your consent, we use your personal contact data to keep you informed of:

- a) the status of your transaction (i.e. order created, order paid, order collected);
- b) competitions and competition results (past; upcoming; current); and

c) promotions (past; upcoming; current).

With your permission and/or where permitted by law, we may also use your personal data for marketing purposes. This may include contacting you by email, text message and telephone with information, news, and offers on our services. You will not be sent any unlawful marketing or spam. We will always work to fully protect your rights and comply with our obligations under the applicable data protection legislation and applicable Privacy and Electronic Communications Regulations, and you will always have the opportunity to opt-out.

We may share your personal data with third party service providers for the purpose of carrying out our marketing purposes (but strictly in accordance with this Privacy Notice), with your permission and/or where permitted by law.

We use automated system/s for carrying out certain kinds of decision-making and profiling in respect of some services or products and also as part of our continuous improvement of new and existing products and services.

If you want to query any action that we take on the basis of an automated decision or wish to request 'human intervention' (i.e. have someone review the action themselves, rather than relying only on the automated method), the data protection legislation gives you the right to do so. Please contact us to find out more.

We will also use your personal data if we reasonably believe that another purpose is compatible with the original purpose(s) and need to use your personal data for that further purpose. If we do use your personal data in this way and you wish us to explain how the new purpose is compatible with the original, please contact us.

If we need to use your personal data for a purpose that is unrelated to, or incompatible with, the purpose(s) for which it was originally collected, we will inform you and explain the legal basis which allows us to do so.

In some circumstances, where permitted or required by law, we may process your personal data without your knowledge or consent. This will only be done within the bounds of the data protection legislation and your legal rights.

7. Special Personal Information or Special Category Data

Applicable data protection legislation prohibits the processing of 'special personal data or special category data', also called 'sensitive data' unless you have given your consent or if there is another lawful basis for us to collect and process that information.

Sensitive data includes information revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data, and data concerning health, sex life or sexual orientation. There are also restrictions on processing of criminal convictions and offences.

With the exception of biometric data and data concerning health (where legally required), it is Mukuru's policy that we do not ask for or collect any of the above data from you or any other party. We ask that you please do not reveal any sensitive data about yourself or others in any communication with us.

Biometric Data

Biometric data means personal data resulting from specific technical processing relating to the physical, physiological or behavioural characteristics of a natural person, which allow or confirm the unique identification of that natural person, such as facial images or dactyloscopic data (fingerprint data).

Facial imaging and fingerprint data are just two examples, but these are not exhaustive.

If your device has fingerprint or facial recognition biometrics enabled, we may use this (via token) to access the Customer App securely. You will be asked to give us your consent to enable us to use your biometric data to access the Customer App in this regard.

We may also use your biometric data where processing is necessary for reasons of substantial public interest to:

- a) prevent or detect unlawful acts;
- b) preventing fraud; and
- c) on suspicion of terrorist financing and money laundering.

We do not ordinarily collect your health information. If we do need to collect health information, and share it, it is to comply with applicable law, with a body such as a health organisation, strictly as dictated by law.

8. How Long Will You Keep My Personal Data?

We will not keep your personal data for any longer than necessary to fulfil the reason(s) for which it was first collected. We are obliged by applicable financial laws to keep certain data for a specific period after an account is closed (reference to account throughout this Privacy Notice means an account required to access and/or use certain areas and features of Our Site). In some cases, such as an enquiry from a law enforcement agency, we may have to hold it longer. We may also keep information to protect our interests, for example in case of litigation.

9. How and Where Do You Store or Transfer My Personal Data?

We will store some of your personal data within the European Economic Area (the "EEA"). The EEA consists of all EU member states, plus Norway, Iceland, and Liechtenstein. This means that your personal data will be fully protected under the EU GDPR and/or to equivalent standards by law.

We may store some or all your personal data in countries outside of the EEA. These are known as "third countries". We will take additional steps to ensure that your personal data is treated just as safely and securely as it would be within the UK and under the data protection legislation as follows:

- a) We will ensure that your personal data is protected under binding corporate rules. Binding corporate rules are a set of common rules which all our group companies are required to follow when processing personal data.
- b) We will also use specific approved contracts which ensure the same levels of personal data protection that apply under the applicable data protection legislation.

Please contact us for further information about the particular data protection safeguards used by us when transferring your personal data to a third country.

The security of your personal data is essential to us, and to protect your data. We take a number of important measures, including the following:

- a) limiting access to your personal data to those employees, agents, contractors, and other third parties with a legitimate need to know and ensuring that they are subject to duties of confidentiality;
- b) procedures for dealing with data breaches (the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, your personal data) including notifying you and/or the supervening authority, where legally required.

10. Do You Share My Personal Data?

We will not share any of your personal data with any third parties for any purposes, subject to the following exceptions:

- a) to provide you with the information, products and services that you have requested from us;
- b) to complete any transaction you are undertaking with us;
- c) to verify your information;
- d) to administer any promotion, survey or competition that you enter via one of our channels; and/or
- e) to consider you for possible employment if you have submitted your information for that purpose.

Where your personal data is shared with a third party, as described above, we will take steps to ensure that your personal data is handled safely, securely, and in accordance with your rights, our obligations, and the third party's obligations under the law, as described above in Section 9.

If any personal data is transferred outside of the EEA, we will take suitable steps to ensure that your personal data is treated just as safely and securely as it would be within the EEA and under the applicable data protection legislation, as explained above in Section 9.

In some limited circumstances, we may be legally required to share certain personal

data, which might include yours, if we are involved in legal proceedings or complying with legal obligations, fraud prevention, a court order, or the instructions of a government authority.

We may share your personal data with third parties when there is a change of control or sale of corporate entities or business units. If any such change of ownership happens, we will ensure that it is under terms that preserve the confidentiality of personal data. The organization receiving any personal data will have to honour any promises we have made in our Privacy Notice.

We will never sell your personal data to third parties to permit them to market their goods or services to you.

11. Do you receive information about me from third parties?

Yes, in some situations we need to collect information about you from other sources, including other companies (subject to their privacy policies and applicable law), recruitment agencies (where applicable), from other accounts we have reason to believe you control and from sanction lists, to ensure we do not deal with entities or individuals that are subject to sanctions.

We may receive information about you if you use any of the other websites, we, or one of our Mukuru Group, operate or the other services we provide. We are also working closely with third parties (including, for example, business partners, customers who participate in our refer-a-friend programme, service providers, advertising networks, analytics providers, and search information providers) and may receive information about you from them. This may be combined with the information you provide to us.

Customer (Sender and Recipient) (When a Customer uses Mukuru Services)

Customer (Sender and Recipient) Identity Profile (i.e. sanctions)

Customer (Recipient) (Where we are the Pay-Out partner)

Country	ID Number
First Name	Date of Birth
Middle Name	Relationship
Surname	ID Document Image
Mobile Number	Signature (i.e. Collection Slip Image)
Gender	City (i.e. Payment Location)

If you provide personal data about others to us, or if others give us your personal data, we will only use that information for the specific reason for which it was provided to us. If you believe that your personal data has been provided to us and would like to request that it be removed from our database, please contact us.

Employment Candidate

Candidate Profile (i.e. from LinkedIn or Indeed)	Candidate Background (i.e. credit history)
Candidate Background (i.e. criminal convictions or offences)	Candidate Identity (i.e. verifying claimed identity)

12. How Can I Control My Personal Data?

In addition to your rights under the data protection legislation, set out in Section 4, when you submit personal data via Our Site, you may be given options to restrict our use of your personal data. We aim to give you control on our use of your data for direct marketing purposes (including the ability to opt-out of receiving emails from us which you may do by unsubscribing using the links provided in our emails and at the point of providing your details and by managing your account).

You may restrict our use of Cookies. For more information on Cookies, including how we use Cookies, please go to our Cookie Policy www.mukuru.com/en-uk/cookies-policy/

13. Can I Withhold Information?

You may access certain areas of Our Site without providing any personal data at all. However, to use all features and functions available on Our Site you may be required to submit or allow for the collection of certain data.

14. How Can I Access My Personal Data?

If you want to know what personal data we have about you, you can ask us for details of that personal data and for a copy of it (where any such personal data is held). This is known as a "subject access request" or "SAR".

All subject access requests should be made in writing and sent to the email shown in Section 1.

A subject access request is not normally charged for. But, if your request is 'manifestly unfounded or excessive' (for example, if you make repetitive requests) a fee may be charged to cover our administrative costs in responding.

We will respond to your subject access request within one month of receiving it. We aim to provide a complete response, including a copy of your personal data within that time. If your request is more complex, more time may be required up to a maximum of three months from the date we receive your request. You will be kept fully informed of our progress.

15. My Responsibility

We keep our security technology up to date to protect your information, but we do not have control over the devices you use to access Mukuru Services.

It is your responsibility to safeguard your online information and transactions by taking all reasonable measures which may include the following:

- a) Do not share your information or provide any opportunities for anyone to gain access to your information through your devices, including tablets, phones, watches, or laptops.

- b) Do not share your login details with any other person and never share your login details with a Mukuru employee or agent for any reason.
- c) Do not click on any internet link contained in an email or SMS which directs you to a Mukuru website. Always manually type our address www.mukuru.com into your internet browser or use the app.
- d) Log out and close your browser before visiting other websites once you have completed your transactions.
- e) Ensure that you use the latest version of your internet browser and that you have up-to-date anti-virus, firewall and other security software installed on your device.

Password security

To help us protect your information, where Mukuru services require a username and password, we recommend you do the following:

- a) Do not choose a password that could be easily guessed or is known by another person.
- b) Avoid using personal data such as your name, birth date or telephone number, or ordinary words found in a dictionary.
- c) Memorise your password - do not write it down.
- d) Never reveal the password to anyone else. We will never ask you for your password and you should not disclose it to anyone claiming to work for us or our business partners.
- e) Do not use the same password on other services.

16. Changes to this Privacy Notice

We may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if we change our business in a way that affects personal data protection.

If you do not agree with the changes, then you must stop using Our Site and Mukuru Services or any of Mukuru's Channels. If you continue to access or use any of these, following notification of a change to the terms, the changed terms will apply to you, and you will be deemed to have accepted those updated terms.

We recommend that you check this page regularly to keep up-to-date.