

## 4G Capital Data Privacy Notice

4G Capital respects the privacy of our customers and holds the security of personal customer data in the highest regard. In doing so the company adheres to the Kenya Data Protection Act 2019.

From time to time, 4G Capital may request information, including personal information, from our customers, in order to provide products and services to these customers. 4G Capital will take every precaution to ensure that such data is protected against unauthorised use.

### **Collecting and sharing customer information**

Depending on the product and service being offered by 4G Capital, the Company collects and processes personal identifiers (e.g. full name, national ID details, address), emergency contact details, next of kin information and financial information. Most of the personal information we process is provided to us directly by you in order for us to:

- Conduct KYC/AML checks on you as our customer to ensure you are who you say you are;
- Be assured that the business we seek to engage with is indeed a legitimate business and one in which you own and / or control;
- Ensure we remain compliant with the various regulatory requirements we have as a financial institution

We also receive personal information indirectly (for example from organizational bodies you are a member of, or distributors in which you receive your goods / stock from). The main lawful grounds we rely on for processing information we obtain either directly or indirectly is:

- a) Your consent
- b) We have a contractual obligation
- c) We have a legal obligation
- d) Legitimate interests

4G Capital may share customer data with third parties such as regulatory bodies and Credit Reference Bureau. 4G Capital may also request data about our customers from the Credit Reference Bureau. This sharing of data with the Bureau is to protect our customers from harmful or irresponsible lending practices.

**MAURITIUS**

FOURTH GENERATION CAPITAL GROUP LIMITED  
% CROSSINVEST  
SUITE FFO1 ENDEMIKA BUSINESS PARK PH2  
PETIT RAFFRAY, MAURITIUS

**KENYA**

2ND FLOOR AFRICA REIT HOUSE,  
AFRICA REIT LANE,  
KAREN, NAIROBI, KENYA  
P.O. BOX 287 00502

**UGANDA**

CEMENTERS PLAZA,  
PLOT 59,  
LUTHULI AVENUE,  
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4G Capital may share your personal data with third parties such as service providers. Such disclosures will be done in accordance with the law and, where necessary, with your consent. We also require our employees and any third party who we engage to comply with our internal policies and apply the appropriate compliance measures as required by the applicable laws and regulations, which may include: executing confidentiality agreements, data sharing / processing agreements and other measures to safeguard your data.

Your personal data may be stored and processed in any country where we have facilities or in which we engage data controllers or processors. Where the data is shared outside of Kenya, we will ensure that it has an appropriate level of protection and that the transfer is lawful, in accordance with the applicable data protection laws and regulations. If 4G Capital acquires data about any of our existing / prospective customers from a third party, 4G Capital intends to inform the customer of this fact and give the customer due opportunity to object to use of such data.

## Your rights

Under data protection law, you have rights including:

- **Your right of access** - You have the right to ask us for copies of your personal information.
- **Your right to rectification** - You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.
- **Your right to deletion** - You have the right to ask us to delete your personal information in certain circumstances.
- **Your right to restriction of processing** - You have the right to ask us to restrict the processing of your personal information in certain circumstances.
- **Your right to data portability** - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances

Upon any requests concerning your rights, 4G Capital will comply, provided that this does not impact on our ability to provide our products and services to the customer (in which case we will inform the customer of such) and provided that it does not compromise our ability to adhere to our wider legal and regulatory obligations (e.g. investigate or prosecute fraud or any other criminal behavior). Any such objections, requests or complaints may be directed to [dataprotectionofficer@4g-capital.com](mailto:dataprotectionofficer@4g-capital.com)

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## Storing and recording customer information

4G Capital keeps all personal data relating to customers in a secure database. Only authorised staff-members are given access to this data. When 4G Capital processes personal data, we undertake to keep a record of these processes. This record shall be maintained for as long as mandated to do so from a legal / regulatory perspective:

- Customer identification documents are retained throughout the life of the account and for **at least 7 years** after the cessation of the financial relationship / transaction date;
- In litigation and/or regulatory investigations, the records will be kept for **as long as they are required** in accordance with the litigation/investigation processes we are subject to;
- Anonymised information that can no longer be associated with you **may be held indefinitely**.

## How to complain

If you have any concerns about our use of your personal information, you can make a complaint to us by sending an email to [dataprotectionofficer@4g-capital.com](mailto:dataprotectionofficer@4g-capital.com) or by post to:

Data Protection Officer  
4G Capital Limited  
Africa REIT House  
Africa REIT Lane  
Karen  
Nairobi  
Kenya  
P.O. BOX 287 00502

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