



## DATA PRIVACY POLICY (PUBLIC FACING)

### ABOUT BALOZI SACCO

Balozi Sacco is a duly registered Sacco in Kenya and regulated by SASRA to offer financial services to its members. The Sacco use the data subject personal data to provide and improve the services. By using these Services, the data subject agrees to the collection and use of information in accordance with this policy.

### ABOUT THIS PRIVACY POLICY.

The Sacco is committed to protecting the data subject's personal data and respecting the data subject's privacy.

This Privacy Policy explains in detail the types of personal data the Sacco may collect about the data subject when the data subject interacts with us through any of our contact points with a view of visiting our premises, requesting to join our membership, requesting for credit, savings deposit, general inquiries, and membership exit.

The interaction points that the data subject may have with us could be over the phone, in person, over email or via our enquiry forms on our website or social media platforms. It also explains how we store and handle that data, keep it safe and tell the data subject about the privacy rights and how the law protects the data subject.

It is likely that the Sacco shall need to update this privacy policy from time to time. The Sacco shall notify the data subject of any significant changes.

### 1. Scope of This Policy

This Policy applies to all interactions with the Sacco including:

- Online and mobile platforms
- Website visitors and digital services
- Customer support interactions (phone, email, chat)
- Office visits

### 2. Collection of Personal Data

#### 2.1 Why we Collect Your Personal Data:

Some of the purposes for which we collect and process your data includes:

- To provide and maintain our service.
- To comply with legal obligations.
- To notify you about changes to our service.
- To allow you to participate in interactive features of our service when you choose to do so.
- To provide member support.
- To gather analysis or valuable information so that we can improve our service.

- To monitor the usage of our service.
- To detect, prevent and address technical issues.
- 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.

Please note we may be unable to provide the requested products or services if you do not provide the necessary personal data required for the Sacco to comply with legal obligations or fulfill the terms of our contract with you.

All purposes of collection and processing of your data shall be informed by an appropriate legal basis such as contractual necessity, legitimate interest, legal obligations, etc.

## **2.2 What we Collect:**

We shall collect data directly from you or from third party sources as needed, these can include Names, I.D./Passport Number, Date of Birth, Gender, Marital Status, Biometric Data, Property Details, Residential Address, Postal Address, Telephone Number, Financial Background, Next of Kin, Nominee, Employment or Business Details, and more, based on the specific purposes.

We shall collect personal data of members, contractors, staff, vendors, any individuals connected to a member that are relevant to their relationship with us, including information received directly or indirectly in connection with the provision of our services. Examples include company directors, shareholders, guarantors, next of kin, nominees, beneficiaries, agents, and holders of Powers of Attorney (PoA).

If you share another individual's personal data with us, please ensure you have their consent or a lawful basis to disclose that information.

## **2.3 Legal Basis for Processing Your Information**

- Our legal basis for collecting and using the personal information described above will depend on the personal information concerned and the specific context in which we collect it.
- However, we will normally collect personal information from you only.
- Where we have your consent to do so.
- Where we need the personal information to perform a contract with you (provide you with a product/service you have applied for).
- Where the processing is in our legitimate interests and not overridden by your rights.
- In some cases, we may also have a legal obligation to collect personal information from you.
  - If we ask you to provide personal information to comply with a legal requirement or to perform a contract with you, we will make this clear at the relevant time and advise you whether the provision of your personal information is mandatory or not (as well as the possible consequences if you do not provide your information).
  - Similarly, if we collect and use your personal information in reliance on our legitimate interests (or those of any third party), we will make clear to you at the relevant time what those legitimate interests are.

## **3. Sharing Your Information**

The Sacco will share your personal data with relevant and authorized third parties including Sacco's service providers, regulators, credit reference bureaus and others as appropriate.

## 4. Cross-Border Data Transfers

Your personal data may be transferred to jurisdictions outside Kenya for the purposes outlined in this Data Privacy Policy.

Such transfers will only occur where they are lawful and necessary, for example, where the receiving party is subject to adequate data protection safeguards, where you have provided consent, where transfer is required for the performance of a contract, or where the transfer is for your benefit. Balozi Sacco and its service providers will ensure that appropriate measures are in place to protect your data in transit and at rest, and that the applicable legal and regulatory requirements of the destination jurisdiction are complied with.

## 5. Safeguards and security of data

The Sacco endeavors to protect your personal data through diverse technical, administrative, operational, structural, and other measures to ensure confidentiality, integrity and availability objectives are met.

## 6. Your Privacy Rights

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

- The right to be informed of the use of your information/data.
- The right to access, update or delete the information or data in our custody.
- The right of rectification. You have the right to have your information/data rectified or deleted if that information is misleading, inaccurate or incomplete.
- The right to object. You have the right to object to our processing of your Personal Data.
- The right to object to automated processing of your Personal Data.
- The right of restriction. You have the right to request that we restrict the processing of your personal information.
- 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.
- The right to withdraw consent. You also have the right to withdraw your consent at any time where Balozi Sacco Society Limited relied on your consent to process your personal information, without any detriment to your interests.

To exercise of any of these rights, you may:

- Email us at: [dpo@balozisacco.com](mailto:dpo@balozisacco.com)
- Visit our office to lodge a request.
- Call us at +254 020 2211600 / 720 833326 / 733 967707

Upon verification of your identity, we shall action and respond to your request within 30 days.

Please note that we may ask you to verify your identity and provide signed instructions before responding to such requests.

You may unsubscribe from certain email communications by following the Unsubscribe link in the email communication itself.

## **7. Data Retention**

Balozi 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.

## **8. Cookies, Tracking & Digital Advertising**

Sacco's website uses cookies. Cookies are small files stored on your computer's hard drive which are used to collect your personal information. You may choose to refuse cookies but, if you do so, some of the functionality of the Website may no longer be available to you.

For more information about cookies, including further details as to what they are and how to refuse them, please see our Cookies Policy.

## **9. Automated Decision-Making & Profiling**

Automated decision-making may be used to assist with lending, financial crime prevention, account management, and the personalization of products and services. If any automated decision affects your rights or freedoms, a human review will be required to ensure fairness and accuracy.

You have the right to request for human review of a decision made from an automated process, by lodging a right request as per Clause 6 above.

## **10. Children's Privacy**

We collect personal data of minors for accounts and services requiring such data with minimal possible data collected and parental/legal guardian consent required.

We strongly believe in protecting the privacy of children. In line with this belief, we do not knowingly collect or maintain personal information from persons under 18 years of age, and no part of the Website is directed to persons under 18 years of age. If you are under 18 years of age, then please do not use or access the Website at any time or in any manner. We will take appropriate steps to delete any personal information of persons less than 18 years of age.

## **11. Complaints**

To submit any complaints regarding data privacy and protection, you may:

- Email us at: [dpo@balozisacco.com](mailto:dpo@balozisacco.com)
- Visit our office to lodge a request.
- Call us at +254 020 2211600 / 720 833326 / 733 967707

## **12. Data Privacy Policy Review:**

Balozi 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. 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.

#### **14. Contact Information**

- **Address:** Golf View Suites, 3<sup>rd</sup> Floor, Wambui Road, Muthaiga
- **Telephone:** +254 020 2211600 / 720 833326 / 733 967707
- **Email:** info@balozisacco.com

**Last Reviewed:** 12<sup>th</sup> December 2025

**Approved:** 20<sup>th</sup> December 2025