

REXIAL PRIVACY POLICY

WHO WE ARE

Rexial Payment Systems Limited (Rexial) is a company duly incorporated in Uganda under registration number 80034573580295. We are located at 13B Nyangweso Road, Kampala, Uganda.

Please read this Privacy Policy carefully and ensure that you understand it. By using our site and, or our application, you give the affirmative consent that you have read and accepted all the terms in this Privacy Policy. If you do not accept and agree with this Privacy Policy, you must stop using Our Site/application immediately.

1. **Definitions and Interpretation**

In this Policy the following terms shall have the following meanings:

“Account”	means an account required to access and/or use certain areas and features of Our Site or application;
“Cookie”	means a small text file placed on your computer or device by Our Site when you visit certain parts of Our Site and/or when you use certain features of Our Site. Details of the Cookies used by Our Site are set out in this Policy; and
Site	means our website www.rexial.com and/or the Rexial mobile application downloadable from the app store or play store or from our website.

2. **What Does This Policy Cover?**

This Privacy Policy applies to your use of our Site and, or application. Please note that we have no control over how your data is collected, stored, or used by other websites whose links may be provided on our website and we advise you to check the privacy policies of any such websites before providing any data to them.

3. **What is Personal Data?**

Personal data means information about a living person from which the person can be identified, that is recorded in any form and includes data that relates to the nationality, age or marital status of the person, the educational level, or occupation of the person, an identification number, symbol or other particulars assigned to a person; identity data or other information which is in the possession of the data controller and includes expressions of opinion about the individual. Such person is referred to as a Data Subject.

4. **Rights of the data subject**

As a data subject, you have the following rights, which we will always work to uphold:

- a) The right to be informed about our collection and use of your personal data.
- 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 held by us 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 have.
- e) The right to restrict the processing of your personal data.
- f) The right to object to us using your personal data for a particular purpose(s).
- g) The right to data portability. This allows you, the Data Subject to obtain and re-use the personal data we may collect from you, for your own purposes across different services, applications, or platforms.

5. **The data we collect and why?**

Depending upon your use of our Site and, or application, we may collect some or all of the following personal information to be able to identify you, locate you, process and complete transactions, improve on our service delivery, for product research development, for analytics, to communicate to you link you to an Originator Bank or Paying Bank or other financial service provider, to employ you and or, onboard you for a service or for the supply of services and generally to improve your user experience e.t.c;-

- Name; date of birth; gender; physical address; email address; IP address payment/financial information; telephone number; information about your preferences/interests and changes thereto, web browser type, operating system, URL (may include the referring site, your activity on our site and the site you exit to), employee data (such as employee ID number, social security number, bio-metrics, psychometrics, employee picture e.t.c.

6. **How we use your personal information**

We use your data for the necessary performance of a contract with you and because you have consented to the use of your personal information, or because it is in our legitimate business interests to use it. Your personal information may also be used for the following purposes:

- Providing and managing your Account;
- Providing and managing your access to Our Site and, or application;
- Personalising and tailoring your experience on Our Site and, or application;

- Supplying our services to you. Your personal details are required for us to enter into a contract with you.
- Personalising and tailoring our services for you.
- Communicating with you. This may include responding to emails or calls from you.
- Supplying you with information that you have the option to opt-out at any time

We may also use your personal information for marketing purposes, which may include contacting you by email, telephone, text message or any other means, 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 law, and you will always have the opportunity to opt-out.

Third Parties whose content appears on Our Site may use third-party Cookies. Please note that we do not control the activities of such third parties, nor the data that they collect and use themselves, and we advise you to check the privacy policies of any such third parties.

7. **Period for data retention**

We store data until it is no longer necessary to provide our services or until your account is deleted - whichever comes first. This is a case-by-case determination that depends on things like the nature of the data, why it is collected and processed, and relevant legal or operational retention needs in accordance with the law.

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

We will only store or transfer your personal data to countries that have adequate data protection standards/laws. We may in certain instances such as for analytics purposes or share your data with external third parties, that may be based out of your jurisdiction. In any such case, we shall ensure any such data is transferred securely and following best practice in your jurisdiction.

We store your data on the cloud on servers based in the United States of America.

9. **Do You Share My Personal Data?**

We may share your personal data with processors and other companies in our group and this may include subsidiaries, a holding company or any other entity that is a party to a merger and/or acquisition of an interest in Rexial.

We may sometimes contract with third-party data processors to supply certain services. These may include payment processing, delivery, and marketing. In some cases, those parties may require access to some or all of your personal data that we hold.

If any of your personal data is required by a processor, 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. Without prejudice, you are advised to read the privacy policies of any processors we may contract.

10. **How Can I Access/control My Personal Information?**

If you want to know what personal data we have about you or you would like to rectify any of your personal information, 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 "Data Subject Access Request" (DSAR).

All Data Subject Access Requests should be made in writing and sent to the email or postal addresses compliance@rexial.com. We do not charge for a subject access request 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 DSAR within the period provided under the Data Protection and Privacy Act, 2019. We will aim to provide a complete response, including a copy of your personal data within the time specified under the law. In some cases, however, particularly 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.

11. **How We Use Cookies?**

Our Site may place and access certain first-party Cookies on your computer or device. First-party Cookies are those placed directly by us and are used only by us. We use Cookies to facilitate and improve your experience of our Site and to provide and improve our services. We have carefully chosen these Cookies and have taken steps to ensure that your privacy and personal data is protected and always respected.

By using our Site, you may also receive certain third-party Cookies on your computer or device. Third-party Cookies are those placed by websites, services, and/or parties other than us.

Before Cookies are placed on your computer or device, you will be shown a pop-up requesting your consent to set those Cookies. By giving your consent to the placing of Cookies you are enabling us to provide the best possible experience and service to you. You may, if you wish, deny consent to the placing of Cookies; however certain features of our Site may not function fully or as intended. You will be given the opportunity to allow only first-party Cookies and block third-party Cookies.

You may block these Cookies by changing your internet browser's settings, but please be aware that our Site may not work properly if you do so. We have taken great care to ensure that your privacy is not at risk by allowing them.

In addition to the controls that we provide, you can choose to enable or disable

Cookies in your internet browser. Most internet browsers also enable you to choose whether you wish to disable all Cookies or only third-party Cookies. By default, most internet browsers accept Cookies, but this can be changed. For further details, please consult the help menu in your internet browser or the documentation that came with your device.

You can choose to delete Cookies on your computer or device at any time, however you may lose any information that enables you to access our Site more quickly and efficiently including, but not limited to, login and personalisation settings.

It is recommended that you keep your internet browser and operating system up-to-date and that you consult the help and guidance provided by the developer of your internet browser and manufacturer of your computer or device if you are unsure about adjusting your privacy settings.

12. **Contacting us**

If you have any questions about this policy, you can contact us as described below.

Email: compliance@rexial.com

Telephone: +256772842100

13. **Changes to this Privacy Policy**

We may change this Privacy Policy from time to time and in some instances without notice to you. This may be necessary, for example, if the law changes, or we change our business in a way that affects personal data protection.

Any changes will be immediately posted on our Site and, or application and you will be deemed to have accepted the terms of the Privacy Policy on your first use of our Site and, or application following the alterations. We recommend that you check this page regularly to keep up-to-date.