



PRIVACY POLICY

Effective Date: 22 July, 2025

Approved By: Managing Director

Version: 1.0

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Introduction

- 1.1 CC Innovation Africa Ltd and its' affiliates ("**CCIA**", "**we**", "**us**" or "**our**") values how the information and data you provide to us is collected, used and shared and is dedicated to respecting and protecting your privacy in compliance with the applicable laws, regulations and obligations on data use and privacy.
- 1.2 CCIA is a data controller for the purposes of this Privacy Policy ("**Policy**"). This means that we determine what we do with the information we collect from you and how we look after it.
- 1.3 This Policy applies to the processing of personal information of our customers ("**you**" or "**your**").

2. Scope of Application

- 2.1 This Privacy Policy describes what information we may collect about you when you use or request for our services or when you visit the CCIA website [This website is currently in production] ("**Website**") (altogether referred to as the "**Services**"); how we use and share your information; how we protect it; and your rights under the Kenya's Data Protection Act, 2019 (the DPA).
- 2.2 The following key terms are used in this Policy:
 - 2.2.1 "**Personal Data**" includes information that can be used to identify an individual.
 - 2.2.2 "**DPA**" means the Data Protection Act, 2019
 - 2.2.3 "**Financial Crime**" means money laundering, terrorist financing, bribery, corruption, tax evasion, fraud, evasion of economic or trade sanctions, and/or any acts or attempts to circumvent or violate any Laws relating to these matters.
 - 2.2.4 "**Processing**" means any action or series of actions performed on personal data, such as collecting, storing, organizing, adapting, retrieving, using, disclosing, transmitting, aligning, restricting, or destroying it.
 - 2.2.5 "**Sensitive personal data**" means data revealing an individual's race, health status, ethnic social origin, conscience, belief, genetic data, biometric data, property details, marital status, family details including names of the person's children, parents, spouse or spouses, sex, or the sexual orientation.

3. Who is responsible for this Policy?

- 3.1 CCIA and its affiliated entities are responsible for the processing of your Personal Data as described in this Privacy Policy.

4. Personal Data we Collect

CCIA may collect and use the following types of Personal Data about you:

- 4.1 **General information:** includes first name, last name, username or similar identifier, marital status, title, date of birth and gender. Information contained in identification documents such as passport or national identification card. We may collect personal details you provide in order for us to provide the Services to you including for example, for any Know Your Customer ("KYC") purposes.
- 4.2 **Contact Details** includes physical address, email address and telephone numbers.
- 4.3 **Financial Data:** includes bank account, payment card details, statements from banks and financial institutions or other payment providers.
- 4.4 **Recruitment Information:** In connection with a job inquiry or application you may provide: name, phone number, email address, gender, education history, employment history and professional designations; and other information about your background and qualifications.
- 4.5 **Log data:** We may also process personal data such as internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, device ID and other technology on the devices you use to access our website. Through access and use of our Investor Portal we may collect your login credentials; first and last name, email address, financial information (such as banking information and an account number); tax details; jurisdiction of tax residence; date of birth; and certain investment-related information.
- 4.6 **Other Information:** Personal details you choose to give when corresponding with us by phone or e-mail, participating in our marketing events or otherwise interacting with CCIA.
- 4.7 We may obtain your Personal Data either directly from you or someone else (such as a credit reference agency, or reference) or it could be created by us. It could be provided or created during your engagement or appointment for suppliers, customers, partners and third parties.
- 4.8 Where you, as our customer, share personal data of any individuals, for example your employees or clients, you represent that you have the necessary rights and permissions to do so in order for us to process such personal data where required as part of the Services in accordance with this Privacy policy.
- 4.9 Where we do collect and process any sensitive personal data, CCIA has adopted appropriate technical safeguards such as encrypted traffic, firewalls, anti – virus software, encryption, multi factor authentication, and access controls to protect your sensitive personal data. Please refer to paragraph 11 below for further information.

5. **How we use your Personal Data**

- 5.1 CCIA will process your Personal Data in accordance with its obligations under the applicable data protection laws as set out below:
- 5.1.1 providing financing services including credit assessment and scoring, loan application, approval, and services;
- 5.1.2 Debt recovery purposes in accordance with the applicable laws and regulations;

- 5.1.3 provide consultation services on management strategy, business planning, and other general management issues; information technology and information systems; personnel, labor, welfare, education, and training; and establishing a new company and general company operation;
- 5.1.4 analyze customer behaviors;
- 5.1.5 to detect and prevent financial crimes and other illegal uses of our service;
- 5.1.6 verify your identity in accordance applicable laws, regulations, and rules such as “know-your-customer,” anti-money laundering and counterfeiting requirements and including our internal policies;
- 5.1.7 manage enquiries on our service offerings and instructions from you;
- 5.1.8 to send you marketing notices, service updates, and promotional offers in relation to CCIA's business;
- 5.1.9 report and share your information with our Head Office in Japan, affiliates, and related corporations; and
- 5.1.10 make disclosures of your information as permitted or required by applicable law, such as disclosures in connection with investigations, to enforce our rights or fulfil contractual or statutory obligations.

(collectively, the “**Purposes.**”) Please note that the list above is not exhaustive, although we have afforded our utmost ability to provide as complete a list as possible.

- 5.2 We may process your Personal Data for more than one lawful ground depending on the specific purpose for which we will use your Personal Data. This will be detailed in the accompanying privacy notice. Please contact us at [shimizu.yutaro728@hfhd.co.jp] if you would like further information.

6. Your Rights as a Data Subject

- 6.1 Subject to certain limitations under the applicable data protection law, you have the right to: -
 - 6.1.1 be informed of how CCIA uses your Personal Data;
 - 6.1.2 access your Personal Data held by CCIA;
 - 6.1.3 object to processing of part of or all your Personal Data. CCIA may however continue to process your Personal Data if we have a legitimate reason to do so. The legitimate reason will be communicated to you upon request;
 - 6.1.4 request for correction of your Personal Data by CCIA where it is incorrect or incomplete;
 - 6.1.5 request that we provide you with a copy of your personal data in an understandable format for your own purposes and use with different service providers. You may also request that we transfer such data to another data controller or data provider, provided that such transfer is feasible; and
 - 6.1.6 request for deletion of your Personal Data if it is false or misleading.
- 6.2 If you may wish to exercise any of the rights set out above, please contact CCIA through [shimizu.yutaro728@hfhd.co.jp].

7. Retention of your Personal Data

- 7.1 CCIA will only retain your Personal Data for as long as reasonably necessary to fulfil the purposes for collection including for the purposes of satisfying any legal, regulatory, or reporting requirements.
- 7.2 CCIA may retain your personal data for a longer period if: -
- 7.2.1 it is required or authorized by law;
 - 7.2.2 it is reasonably necessary for a lawful purpose including instance where you have lodged a complaint or if CCIA reasonably believes that there is a prospect of litigation in respect to our relationship with you; and
 - 7.2.3 authorized or consented by you to maintain a continuous relationship should you.
- 7.3 After the expiry of the applicable retention period, we will delete, erase, anonymize or pseudonymize any information we hold about you.

8. Direct Marketing

- 8.1 We may use and analyze your information to send you marketing and promotional communications for which you have consented and opted in. When you consent and opt-in to receiving our information, we may also send you other information about us, the website, our products, sales promotions, our newsletters, anything relating to other companies in our group or our business partners. If you would prefer not to receive any of this additional information as detailed in this paragraph, please click the **'unsubscribe' or opt-out and OTP link** in any email/communication that we send to you.
- 8.2 You may choose to call us or send us an email at [shimizu.yutaro728@hfhd.co.jp] to opt-out of receiving such communication. At any stage you also have the right to ask us to stop using your Personal Data for direct marketing purposes and withdraw your consent by notification to us through [shimizu.yutaro728@hfhd.co.jp]
- 8.3 We and third parties acting on our behalf may collect information about your online activities over time and across third-party websites to provide you with advertising about products and services tailored to your interests. Where required by applicable law, we will obtain your consent for the processing of your Personal Data for direct marketing purposes.

9. Disclosure of your Personal Data

- 9.1 We do not disclose Personal Data we obtain about you, except as described in this Privacy Policy. We may share your Personal Data with our affiliates and subsidiaries in order to conduct our business operations more smoothly.
- 9.2 We may share and disclose your Personal Data in accordance with applicable data protection laws:
- 9.2.1 in the event we sell or transfer all or a portion of our business or assets (including in the event of a reorganization, spin-off, dissolution, or liquidation);

- 9.2.2 With third parties, such as service providers, agents, and/or our affiliates or related corporations, which may be sited outside of Kenya, in order to facilitate our business operations; and
- 9.2.3 With law-enforcement agencies, regulatory authorities, courts, or other public 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.
- 9.3 We require all third parties to respect the security of your Personal Data and to treat it in accordance with the applicable data protection laws. We do not allow third party service providers to use your Personal Data for their own purposes and only permit them to process your Personal Data for specified purposes and in accordance with our instructions.

10. International Transfers

- 10.1 We may transfer your data outside Kenya to a CC Innovation Africa affiliate under the Hokkoku Financial Holdings Group, located in Japan as part of the company group structure providing group services, for the purposes of fulfilling our contractual obligation and for any legitimate interest in which your personal data is required. Japan has sufficient data protection laws (The Act on the Protection of Personal Information Act No. 57 of 2003 ("APPI")) that ensures that your data is processed and stored lawfully in a manner commensurate to the Kenyan Data Protection Act.
- 10.2 Where personal data is transferred outside the country, we will ensure that it is protected and that the transfer is carried out in accordance with the DPA (including, where appropriate, under an agreement on terms approved for this purpose).
- 10.3 Please contact us if you require more information on the specific mechanism used by CCIA when transferring your Personal Data outside of Kenya.

11. Data Security

- 11.1 CCIA takes your privacy seriously and has therefore put in place processes, policies, security controls, tools, and other adequate technical and operational measures to protect your Personal Data from accidental or unlawful destruction, damage, alteration, unauthorized disclosure, or access, as well as all other forms of unlawful processing. These measures include:
- 11.1.1 **Encryption:** We use advanced encryption technologies to ensure that your data is securely transmitted and stored.
- 11.1.2 **Access Controls:** We have strict access controls in place to ensure that only authorized personnel can access your personal data.
- 11.1.3 **Regular Security Assessments:** We conduct regular security assessments and audits to identify and mitigate potential vulnerabilities.
- 11.1.4 **Firewalls and Intrusion Detection Systems:** We employ firewalls and intrusion detection systems to protect our network from unauthorized access and cyber threats.

- 11.1.5 **Employee Training:** We provide regular training to our employees on data protection and privacy best practices to ensure they handle your data securely.
- 11.1.6 **Incident Response Plan:** We have an incident response plan in place to promptly address any data breaches or security incidents.
- 11.2 Where CCIA engages third parties to process Personal Data on its behalf, such parties do so on the basis of written instructions, are under a duty of confidentiality and are obliged to implement appropriate technical and organizational measures to ensure the security of the data.
- 11.3 Where we do collect and process such sensitive personal data, CCIA maintains administrative, technical, and physical safeguards designed to protect Personal Data against accidental, unlawful, or unauthorized destruction, loss, alteration, access, disclosure, or use.

12. Complaints

- 12.1 If you have any complaints or queries in connection with this Privacy Policy or our Personal Data handling practices, please contact [shimizu.yutaro728@hfhd.co.jp].

13. Breach of this Policy

- 13.1 If you are aware of potential security incident or breach of Personal Data, please report it to [shimizu.yutaro728@hfhd.co.jp]

14. Amendments to this Policy

- 14.1 CCIA reserves the right to amend or modify this Policy at any time. In the event CCIA amends this Policy, CCIA will provide appropriate notice to you and avail an updated copy of the Policy.

Approved By:

Name	Title	Signature	Date
Yutaro Shimizu	Managing Director		22 July, 2025