

Privacy Notice

This Privacy Notice will inform you how OYE Platform Solutions Limited (hereafter “we” or “us”) will process Personal Data belonging to subscribers and users of the Songa App (hereafter “you”) The Songa App is a mobile telephone application or USSD application through which you can purchase fuel on credit and subsequently make payments for this fuel.

This privacy notice will apply to you if you have signed up as an OYE Customer, specifically for the Songa na OYE fuel-now-pay-later service . In order to properly understand your rights as a data subject you are advised to familiarise yourself with this data notice.

Note that this privacy notice should be read together with the Songa na OYE Terms and Conditions. Words and phrases that have been defined in the Songa na OYE Terms and Conditions will bear the same definition in this document.

1. What data do we process?

In order to enable your registration and continued subscription to the OYE loyalty program we will process the following personal data:

1.1. Biographical Information:

- 1.1.1. Full name;
- 1.1.2. Next of Kin information.

1.2. Government-issued Document Information:

- 1.2.1. Passport or National ID number.

1.3. Contact Information:

- 1.3.1. Phone number;

1.4. Transaction Information:

- 1.4.1. Place of purchase of fuel;

- 1.4.2. Amount of fuel purchased;
- 1.4.3. Time of transaction;
- 1.4.4. Repayment instalments.
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- 1.5. Information about your Motorcycle:
 - 1.5.1. Motor Cycle Registration Number;
 - 1.5.2. Motor Cycle Model.
- 1.6. SACCO information;
 - 1.6.1. Whether you are registered to a Transport SACCO;
 - 1.6.2. The name of the Transport SACCO.
- 1.7. Credit Reference Bureau information- information shared with us as a result of a credit reference bureau check.

2. Why do we process personal data?

Personal Data is processed in order to provide you with access to the Songa na OYE services, to determine your creditworthiness to enable us determine your fuel limit, and in order to track payments made for Fuel Transactions.

2.1. Biographical Information:

Biographical information, including full name and date of birth, is requested in order to verify your identity and ensure that you are an adult capable of entering an agreement. We collect your next of kin information in the event that we need to contact them in relation to an incident involving you.

2.2. Government Issued Document Information:

This is collected in order to verify your identity to enable us provide you with our services.

2.3. Contact Information:

Contact information is collected for communication between us and you so that we may send you notifications relating to your Songa na OYE profile. It can also be used

as an alternative means of identification this is because your phone number will be used to identify you as a subscriber on our platform.

2.4. Transaction information:

This is collected so that we can offer our services to you. In order to offer fuel on credit we will need to keep track of this transaction information.

2.5. SACCO Information

We gather information relating to which SACCO you are a member of to confirm compliance with government directives on the operation of a Boda Boda Motorcycle.

2.6. Credit Reference Bureau information

We gather this information in order to determine what Fuel Limit you will be offered under the Songa na OYE program. This is in order to ensure that you can make payments for amounts borrowed.

3. Our Legal Basis for collecting and processing personal data

We will process personal data from you based on the following legal justifications:

3.1. In order to provide you with the services:

In order to create and maintain your profile on the Songa na OYE program we will require personal data that allows us to identify you . We will also need transaction information relating to amount of fuel purchased and fuel station purchased from in order to facilitate the purchase of fuel on credit. We will require your KYC and credit information in order to determine your Fuel Limits

3.2. To pursue our legitimate interests.

We may use your personal data in order to satisfy our legitimate interests or the lawful or legitimate interests of a third party requesting access to your personal data. In all such cases we will ensure that your rights are protected and that the purpose to which the data is being put is reasonable and closely related to the purposes for which you supplied it.

3.3. Consent to collect the personal data.

Note that in order to onboard you to our Songa na OYE it will be necessary for us to process your personal data. This is necessary in order to provide you with the service. By accepting the Terms and Conditions you also provide consent for the use of your personal data in the ways laid out in this document.

3.4. For the purposes of historical or statistical research.

We may use your personal data in order to conduct research or carry out analysis relating to the financial inclusivity, purchase of products, and location of purchase. We will anonymise your data before doing this.

4. What are your rights as a Data Subject?

The following are your rights as a Data Subject submitting data to us:

- 4.1. To access information about the use to which your personal data is to be put, this is contained in this notice;
- 4.2. To access all your personal data in our custody this can be accessed through your profile on the Songa App and will be provided to you upon request through our customer care line upon verification of your details.
- 4.3. To object to the processing of all or part of your personal data, note that we may be unable to provide you certain services related to the OYE loyalty program if you object to processing of personal data;
- 4.4. To correction of false or misleading data.
- 4.5. To the deletion of false or misleading data about you; and
- 4.6. To the access of this Policy.

In order to exercise your rights of objection to data processing, correction of false data, and deletion of false or misleading data kindly call 0111969696 in order to make your request known. You will be required to verify your identity in order to receive assistance as requested. Any request made to us will be responded to within fourteen days and you

will be informed whether the request can be effected and what additional information may be required.

5. Who may receive your data

- 5.1. We will share your data with Odi Credit Limited which is our loan provision partner.
- 5.2. We may share your data with our partners in order to verify transactions carried out by you.
- 5.3. We may share your data with our partners in order to make you eligible for prizes.
- 5.4. We may use your data in order to develop further financial products that we offer to you.
- 5.5. We may share your personal data if compelled to do so by the precepts of any law, court order, or other legal obligation to the Government of Kenya.
- 5.6. We may share your information with third party service providers but only to the extent necessary for them to provide a necessary service to us and after making sure we have the necessary contractual safeguards to ensure that your data will be protected in the same manner that we would protect it.
- 5.7. Under no circumstances will we sell or rent your data to third parties for any purpose whatsoever.
- 5.8. No information that you provide to us will be used to market any product or service to you.

6. Data Retention

We will retain your personal data for a period of seven (7) years as required by the Section 46 of the Proceeds of Crime and Anti-Money Laundering Act 9 of 2009.

7. Data Protection

- 7.1. We have set up internal systems and processes to ensure that your data is protected. Our cybersecurity protocol is constantly tested and updated to keep up with the latest developments in the field and to ensure that all potential threats are addressed before becoming a reality.

- 7.2. Varying levels of encryption are applied to your data and access control is given in a manner that only allows people who need your data for official purposes such as providing a service access to it.
 - 7.3. We will regularly run penetration tests on our systems and update them in line with the latest technology and emerging threats to ensure that your personal data is secure.
8. Customer Care
 - 8.1. In order to receive any assistance in regards to the exercise of your rights as a data subject you can reach out to our data protection offices on 0111969696.
 - 8.2. You can lodge a complaint about the processing of your personal data through the contact information above. Upon receipt of a complaint we shall contact you within seven (7) days in order to assist you resolve the complaint.
9. Changes to the Policy

The Policy may be updated from time to time in line with changes in law and best practices on data protection around the world. In the event that this happens the date on which the policy is updated will also change to enable you confirm when changes are made.

This Policy was last updated on 31st January, 2025